

## ***CABINET Supplementary Agenda***

Date Monday 16<sup>th</sup> June 2025

Time 6.00 pm

Venue Lees Suite, Civic Centre, Oldham, West Street, Oldham, OL1 1NL

Notes 1. DECLARATIONS OF INTEREST- If a Member requires advice on any item involving a possible declaration of interest which could affect his/her ability to speak and/or vote he/she is advised to contact Alex Bougatef or Peter Thompson/Constitutional Services at least 24 hours in advance of the meeting.

2. CONTACT OFFICER for this agenda is Peter Thompson/Constitutional Services: email – [peter.thompson@oldham.gov.uk](mailto:peter.thompson@oldham.gov.uk) or, [constitutional.services@oldham.gov.uk](mailto:constitutional.services@oldham.gov.uk)

### MEMBERSHIP OF THE CABINET

Councillors M Ali, Brownridge, Dean, Goodwin, F Hussain, Jabbar, Mushtaq, Shah (Chair) and Taylor

### Item No

17 Housing Delivery Interim Planning Position (Pages 3 - 40)

The Cabinet is requested to approve the Housing Delivery Interim Planning Position Paper for publication on the council's website, to assist in the interpretation and implementation of existing planning policies in Oldham's Local Plan.

18 Housing Delivery Test Action Plan 2025 (Pages 41 - 126)

The Cabinet is asked to approve the publication of Oldham Council's Housing Delivery Test Action Plan (2025 update).

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## Report to CABINET

# Housing Delivery Interim Planning Position Paper

### **Portfolio Holder:**

Councillor Elaine Taylor, Deputy Leader and Cabinet Member for Neighbourhoods

**Officer Contact:** Emma Barton, Deputy Chief Executive (Place)

**Report Author:** Lauren Hargreaves, Senior Planning Policy Officer  
**Ext.** 3843

**16 June 2025**

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### **Reason for Decision**

To approve the Housing Delivery Interim Planning Position Paper for publication on the council's website, to assist in the interpretation and implementation of existing planning policies in Oldham's Local Plan.

### **Executive Summary**

The Interim Planning Position Paper supports the implementation of policies within Oldham's Local Plan – The Joint Core Strategy and Development Management Development Plan Document, adopted November 2011. The paper supersedes the previous 'Affordable Housing Interim Planning Position Paper' published by the council in March 2022.

The paper sets out the council's updated position in relation to:

- Housing mix – size, type and tenure – including housing mix for affordable housing;
- Affordable housing requirements, including affordable housing thresholds and exceptions (including the application of Vacant Building Credit).
- Housing in the Green Belt including the application of the affordable housing 'Golden Rule'.

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The paper should be used as guidance for developers in preparing development proposals and as a material consideration when assessing planning applications and development proposals for residential development.

It must be read alongside PfE and the Local Plan as a whole, but in particular - PfE policy JP-H2 'Affordability of New Housing', JP-H3 'Type, Size and Design of New Housing' and also policy 3 'Address of Choice', policy 10 'Affordable Housing' and policy 11 'Housing' of Oldham's Local Plan.

The paper is informed by the council's Local Housing Needs Assessment (LHNA) (2024). The LHNA is a key evidence base document and sets out information on local housing needs of different groups (including affordable housing, provision for older people and disabled people), housing mix – including size, tenure and type, and sets out recommendations and policy guidance.

The council's approach to updated national guidance and local evidence will be considered further and inform policy preparation as part of the Local Plan Review.

## **Recommendations**

- i. To have regard to the agreed comments of the Place, Economic Growth and Environment Scrutiny Board on this item from the meeting on 12th June 2025;
- ii. To note that this item will be exempt from call-in, under Rule 14 of the Constitution, as the report has already been considered by the Place, Economic Growth and Environment Scrutiny Board; and
- iii. To approve the Housing Delivery Interim Planning Position Paper for publication on the council's website, to assist in the interpretation and implementation of existing planning policies in Oldham's Local Plan.

## Housing Delivery Interim Planning Position Paper

### 1 Background

- 1.1 The Interim Planning Position Paper supports the implementation of policies within Oldham's Local Plan – The Joint Core Strategy and Development Management Development Plan Document (Joint DPD), adopted November 2011. This paper supersedes the previous 'Affordable Housing Interim Planning Position Paper' published by the council in March 2022.
- 1.2 The paper sets out the council's position in relation to housing mix – size, type and tenure; and affordable housing requirements, including affordable housing thresholds and exceptions (such as the application of Vacant Building Credit).
- 1.3 The paper also explains, in the context of Oldham, recent updates to National Planning Policy (as revised in December 2024) and Planning Practice Guidance, particularly in relation to housing in the Green Belt and applying the affordable housing 'Golden Rule'.
- 1.4 The paper will be used when assessing planning applications and development proposals for residential development against policy 3 'Address of Choice', policy 10 'Affordable Housing' and policy 11 'Housing' of Oldham's Local Plan. It must also be read alongside Places for Everyone (PfE) policies JP-H2 'Affordability of New Housing', JP-H3 'Type, Size and Design of New Housing'.
- 1.5 The paper is informed by the council's LHNA which was updated in 2024<sup>1</sup>. The LHNA is a key evidence base document and sets out information on local housing needs of different groups (including affordable housing, provision for older people and disabled people), housing mix – including size, tenure and type, and sets out recommendations and policy guidance.
- 1.6 The paper provides updated evidence to inform the interpretation and implementation of the policies in Oldham's Local Plan. It is a material consideration and should be used in decision making as appropriate. The positions set out within this paper are summarised below.
- 1.7 In terms of housing mix and implementation of Local Plan policy 11 this paper sets out that in line with the findings and recommendations of the LHNA, all new residential development should be informed by the recommended mix set out in Table 1 overleaf, as appropriate to the tenure of development proposed (market sale, affordable/ social rent and affordable home ownership). The table shows a recommended split for market sale homes, affordable/ social rent homes and affordable home ownership, as follows:
  - Market sale: 70-75% houses, 2-5% flats and 25-30% bungalows/ level-access. 30-35% 1-2 bedroomed, 40-45% 3 bedroomed and 25-30% 4+ bedroomed.

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<sup>1</sup> [Link to online document to be inserted when available]

- Affordable/ social rent: 35-40% houses, 30-35% flats and 30-35% bungalow/ level-access. 70-75% 1-2 bedroomed, 20-25% 3 bedroomed and 5-10% 4+ bedroomed.
- Affordable home ownership: 65-70% houses, 15-20% flats and 15-20% bungalow/ level-access. 35-40% 1-2 bedroomed, 40-45% 3 bedroomed and 20-25% 4+ bedroomed.

1.8 This will ensure that new housing can support local housing needs.

1.9 In addition, PfE policy JP-H4 requires that all new dwellings should comply with nationally described space standards and should be built to 'accessible and adaptable' standard.

*Table 1 - Summary of Overall Dwelling Type/ Size and Mix by Tenure<sup>2</sup>*

Dwelling type/size	Market	Affordable/ social rented	Affordable home ownership	Total
<b>Overall % split</b>	<b>80%</b>	<b>12%</b>	<b>8%</b>	<b>100%</b>
<b>Dwelling type</b>				
House	70-75%	35-40%	65-70%	60-65%
Flat	2-5%	30-35%	15-20%	10-15%
Bungalow/level-access	25-30%	30-35%	15-20%	25-30%
<b>Size (bedrooms)</b>				
1-2	30-35%	70-75%	35-40%	40-45%
3	40-45%	20-25%	40-45%	35-40%
4+	25-30%	5-10%	20-25%	20-25%

1.10 In terms of seeking affordable housing as part of new development, this paper sets out the policy position in line with paragraph 65 of NPPF and considering the evidence of affordable housing need set out in the LHNA. The position is that the council considers it appropriate to continue to apply Oldham Local Plan policy 10 in securing the provision of affordable housing and that this should be on developments of 10 homes or more (in line with the definition of 'Major Development' set out in Annex 2 of NPPF). This position reflects the updates to national planning policy and evidence of local need since the adoption of the Local Plan in 2011.

1.11 In terms of affordable housing tenure, in the application of Local Plan policy 10 and 11, this paper sets out a recommended split for new affordable housing delivery of 65% social/ affordable rent and 35% affordable home ownership. This position is in line with NPPF paragraph 66 and the evidence of affordable housing needs set out in the LHNA. The recommended tenure split will be used as guidance for new affordable housing development, until the policy is reviewed in the new Local Plan.

1.12 The paper also clarifies the council's position in relation to applying Vacant Building Credit (VBC) as an exception to providing affordable housing (in part or in full), in line with NPPF. The criteria for application are set out within the paper.

<sup>2</sup> Adapted from Table 5.1 of the LHNA (2024).

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- 1.13 Finally, in line with the revised NPPF, this paper clarifies the application of the affordable housing 'Golden Rule' as applies to residential development within the Green Belt. Golden Rule a) (affordable housing) will be sought in conjunction with policy 10 of the Local Plan.
  - 1.14 In calculating the number of affordable homes required under this Golden Rule, 15 percentage points will be added to the proportion of the development site capacity that is the equivalent of 7.5% of the total (gross) development sales value (GDV) (the existing policy as set out in policy 10 of the Local Plan). An example is provided within the paper to assist in application.
  - 1.15 The council's approach to updated national guidance and local evidence will be considered further and finalised as part of the Local Plan Review. Further details about the Local Plan Review can be found online<sup>3</sup>.

## **2 Current Position**

- 2.1 The Housing Delivery Interim Planning Position Paper supports the interpretation and implementation of policies within Oldham's Local Plan – The Joint Core Strategy and Development Management Development Plan Document (Local Plan), adopted November 2011. It sets out evidence of local housing need and provides guidance on key housing issues related to planning policy, to assist in planning application decision-making. The paper sets out the council's current position until relevant policies are reviewed as part of the new Local Plan.

## **3 Options/Alternatives**

- 3.1 Option 1 - To approve the Housing Delivery Interim Planning Position Paper for publication on the council's website, to assist in the interpretation and implementation of existing planning policies in Oldham's Local Plan.

Advantages – approving the Housing Delivery Interim Planning Position Paper for publication will ensure effective and consistent decision-making which is in line with local evidence and local and national planning policy. It will provide guidance to developers and planning officers on the interpretation and implementation of housing policies within the current Local Plan.

Disadvantages – there are no disadvantages to approving the Housing Delivery Interim Planning Position Paper for publication.

- 3.2 Option 2 – To not approve the Housing Delivery Interim Planning Position Paper for publication on the council's website.

Advantages – there are no advantages to not approving the Housing Delivery Interim Planning Position Paper for publication.

Disadvantages – not approving the Housing Delivery Interim Planning Position Paper for publication could lead affect consistent decision-making and impact the effective implementation of local planning policy.

## **4 Preferred Option**

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<sup>3</sup> Oldham's Local Plan Review: [https://www.oldham.gov.uk/info/201233/local\\_plan\\_review](https://www.oldham.gov.uk/info/201233/local_plan_review)

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- 4.1 Option 1 is the preferred option - to approve the Housing Delivery Interim Planning Position Paper for publication on the council's website, to assist in the interpretation and implementation of existing planning policies in Oldham's Local Plan. This will support consistent decision-making and the effective implementation of local planning policy.

**5 Consultation**

- 5.1 Formal consultation on Interim Planning Position Papers is not required, however relevant internal officers have been consulted as part of the preparation of the paper.

**6 Financial Implications**

- 6.1 The Housing Delivery Interim Planning Position Paper will be published on the council's website. Therefore, no additional revenue costs will be charged to the service.

(Mohammed Hussain)

**7 Legal Implications**

- 7.1 Interim Planning Papers provide further advice and guidance on applicable planning policy matters which may have arisen since the relevant statutory planning document was adopted by the Council. They are not part of the statutory Local Plan but they are a relevant material consideration in the determination of planning applications, albeit with limited weight. (A Evans)

**8 Equality Impact, including implications for Children and Young People**

- 8.1 The completed Oldham Impact Assessment can be found below:



**IAReport\_Housing  
Delivery Interim Plan**

- 8.2 In terms of the equality characteristics the tool identifies that the Housing Delivery Interim Planning Position Paper is very likely to have a moderate positive impact on care leavers and a strong positive impact on age and disability. The impact on the remaining characteristics is neutral. The planning position paper was found to have a moderate positive impact on the councils Corporate Priority of 'Green and Growing' and a strong positive impact on 'A Great Place to Live' and 'Happier Healthier Lives'.

**9 Key Decision**

- 9.1 Yes

**10 Key Decision Reference**

- 11.1 ESR-09-25

**12 Background Papers**

- 12.1 There are no background papers for this report.

**13 Appendices**

- 13.1 Appendix 1 – Housing Delivery Interim Planning Position Paper



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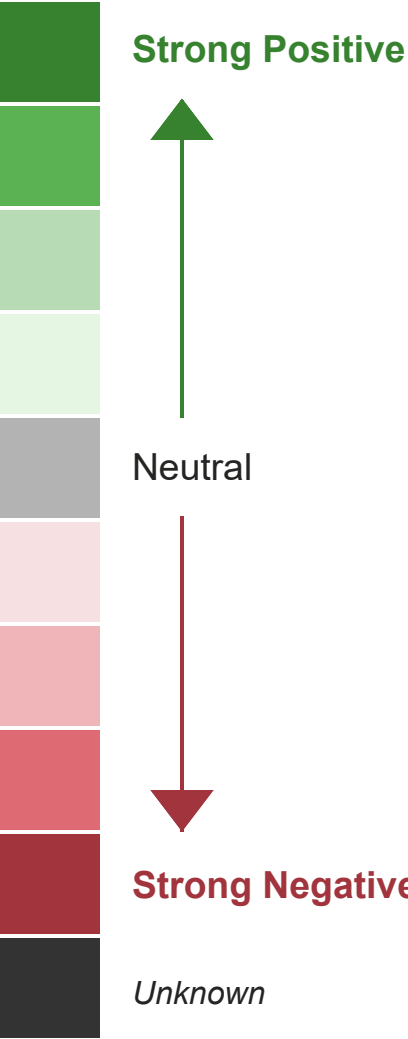
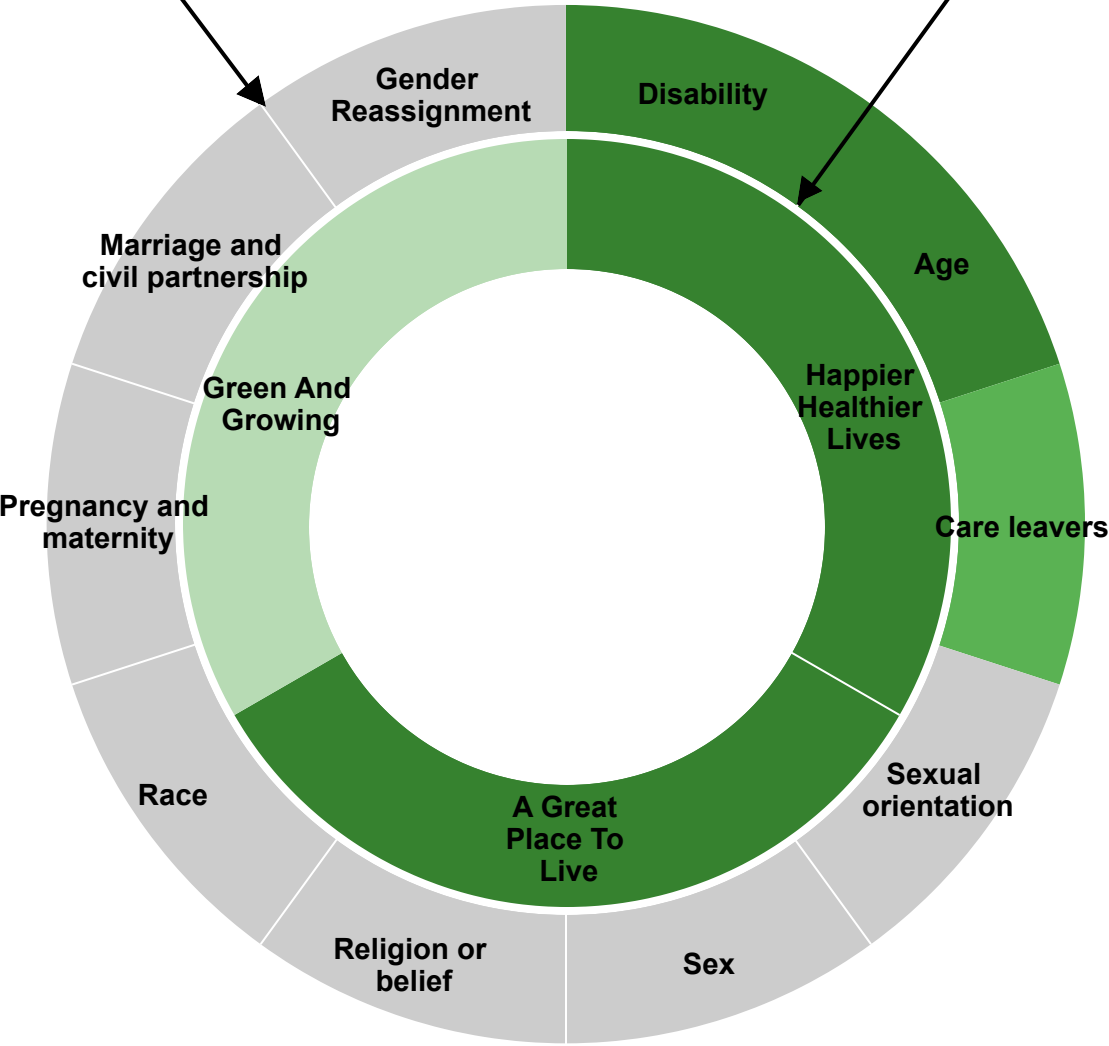
# Housing Delivery Interim Planning Position Paper

completed/last updated by Lauren Hargreaves on 23/04/2025

Portfolio	
<b>Decent Homes</b>	
Directorate	
<b>Place</b>	
Service/Team	
<b>Economy</b>	
Is this IA related to a Budget Reduction proposal?	<b>No</b>

Equality Characteristics

Our Mission



# Equality Characteristics

Category	Impact	Likely	Duration	Impact Score	Comment
Gender Reassignment	Neutral	Very Likely	Long Term	0	
Marriage and civil partnership	Neutral	Very Likely	Long Term	0	
Pregnancy and maternity	Neutral	Very Likely	Long Term	0	
Race	Neutral	Very Likely	Long Term	0	
Religion or belief	Neutral	Very Likely	Long Term	0	
Sex	Neutral	Very Likely	Long Term	0	
Sexual orientation	Neutral	Very Likely	Long Term	0	
Care leavers	Moderate Positive	Very Likely	Long Term	4	The Housing Delivery Interim Planning Position Paper supports the implementation of policies within Oldham's Local Plan. It provides an updated position in relation to housing mix and affordable housing requirements. This could support the delivery of housing for care leavers, particularly in terms of supporting the provision affordable housing, which is in line with local housing needs evidence.
Age	Strong Positive	Very Likely	Long Term	8	The Housing Delivery Interim Planning Position Paper supports the implementation of policies within Oldham's Local Plan. It provides an updated position in relation to housing mix and affordable housing requirements. This considers the needs of older people in terms of recommending suitable house types and sizes based on local housing needs evidence.
Disability	Strong Positive	Very Likely	Long Term	8	The Housing Delivery Interim Planning Position Paper supports the implementation of policies within Oldham's Local Plan. It provides an updated position in relation to housing mix and affordable housing requirements. This considers the needs of disabled people in terms of recommending suitable house types and sizes based on local housing needs evidence.

Our Mission / Corporate Priorities

Category	Impact	Likely	Duration	Impact Score	Comment
Green And Growing	Moderate Positive	Possible	Long Term	2	The Housing Delivery Interim Planning Position Paper supports the implementation of policies within Oldham's Local Plan. It provides an updated position in relation to housing mix and affordable housing requirements. It also provides an updated policy position in relation to housing in the Green Belt. This is to ensure that national and local planning policies are implemented effectively. In line with national policy, the delivery of homes in the Green Belt are required to provide alternative benefits to the community including affordable housing. This paper ensures the process for this is clear. The balance of the loss of Green Belt land will be considered as part of any planning application in line with national and local planning policy and considering this paper and the wider benefits the proposed development would bring, i.e. providing affordable housing. Therefore, it is considered that any loss of Green Belt land can be appropriately mitigated for.
A Great Place To Live	Strong Positive	Very Likely	Long Term	8	The Housing Delivery Interim Planning Position Paper supports the implementation of policies within Oldham's Local Plan. It provides an updated position in relation to housing mix and affordable housing requirements. This considers local housing needs including those for older people, disabled people, families and those in need for affordable housing. It will support the delivery of a diverse housing offer.
Happier Healthier Lives	Strong Positive	Very Likely	Long Term	8	The Housing Delivery Interim Planning Position Paper supports the implementation of policies within Oldham's Local Plan. It provides an updated position in relation to housing mix and affordable housing requirements. This considers local housing needs including those for older people, disabled people, families and those in need for affordable housing. It will support the delivery of a diverse housing offer.

Negative Impacts

Category	Impact	Likely	Duration	Impact Score	What action can be taken to mitigate the potential negative impacts?	Action(s)	Owner(s)	Timescale(s)	If the negative impacts can't be mitigated, why should the project/decision proceed?
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Strong Positive Impacts that are Possible

Category	Impact	Likely	Duration	Impact Score	What action can be taken to increase the likelihood that positive impacts are realised?	Action(s)	Owner(s)	Timescale(s)
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**Oldham**

**Local**

**Plan**

## **Housing Delivery Interim Planning Position Paper**

**June 2025**



**Oldham**  
Council

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# 1. Executive Summary

- 1.1. This Interim Planning Position Paper supports the implementation of policies within Oldham's Local Plan – The Joint Core Strategy and Development Management Development Plan Document, adopted November 2011. This paper supersedes the previous 'Affordable Housing Interim Planning Position Paper' published by the council in March 2022.
- 1.2. The paper sets out the council's position in relation to housing mix – size, type and tenure; and affordable housing requirements, including affordable housing thresholds and exceptions (such as the application of Vacant Building Credit).
- 1.3. The paper also explains, in the context of Oldham, recent updates to National Planning Policy (as revised in December 2024) and Planning Practice Guidance, particularly in relation to housing in the Green Belt and applying the affordable housing 'Golden Rule'.
- 1.4. The paper will be used when assessing planning applications and development proposals for residential development against policy 3 'Address of Choice', policy 10 'Affordable Housing' and policy 11 'Housing' of Oldham's Local Plan. It must also be read alongside Places for Everyone (PfE) policies JP-H2 'Affordability of New Housing', JP-H3 'Type, Size and Design of New Housing'.
- 1.5. The paper is informed by the council's Local Housing Needs Assessment (LHNA) which was updated in 2024. The LHNA is a key evidence base document and sets out information on local housing needs of different groups (including affordable housing, provision for older people and disabled people), housing mix – including size, tenure and type, and sets out recommendations and policy guidance.
- 1.6. The paper provides updated evidence to inform the interpretation and implementation of the policies in Oldham's Local Plan. It is a material consideration and should be used in decision making as appropriate. The positions set out within the paper are summarised below.
- 1.7. In terms of housing mix and implementation of Local Plan policy 11 this paper sets out that in line with the findings and recommendations of the LHNA, all new residential development should be informed by the recommended mix set out in Table 1, as appropriate to the tenure of development proposed (market sale, affordable / social rent and affordable home ownership). This will ensure that new housing can support local housing needs. In addition, PfE policy JP-H4 requires that all new dwellings should comply with nationally described space standards and should be built to 'accessible and adaptable' standard.
- 1.8. In terms of seeking affordable housing as part of new development, this paper sets out the policy position in line with paragraph 65 of NPPF and considering the evidence of affordable housing need set out in the LHNA. The position is that the council considers it appropriate to continue to apply Oldham Local Plan policy 10 in securing the provision of affordable housing and that this should be on developments of 10 homes or more (in line with the definition of 'Major Development' set out in Annex 2 of NPPF). This position reflects the updates to national planning policy and evidence of local need since the adoption of the Local Plan in 2011.

- 1.9. In terms of affordable housing tenure, in the application of Local Plan policy 10 and 11, this paper sets out a recommended split for new affordable housing delivery of 65% social/ affordable rent and 35% affordable home ownership. This position is in line with NPPF paragraph 66 and the evidence of affordable housing needs set out in the LHNA.
- 1.10. This paper also clarifies the council's position in relation to applying Vacant Building Credit (VBC) as an exception to providing affordable housing (in part or in full). The criteria for application are set out in section 4.
- 1.11. Finally, in line with the revised NPPF, this paper clarifies the application of the affordable housing 'Golden Rule' as applies to residential development within the Green Belt. Golden Rule a) (affordable housing) will be sought in conjunction with policy 10 of the Local Plan. In calculating the number of affordable homes required under this Golden Rule, 15 percentage points will be added to the proportion of the development site capacity that is the equivalent of 7.5% of the total development sales value. An example is provided in section 5 to assist in application.
- 1.12. The council's approach to updated national guidance and local evidence will be considered further and finalised as part of the Local Plan Review. Further details about the Local Plan Review can be found [online](#)<sup>1</sup>.

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<sup>1</sup> Oldham's Local Plan Review: [https://www.oldham.gov.uk/info/201233/local\\_plan\\_review](https://www.oldham.gov.uk/info/201233/local_plan_review)

## 2. Background

- 2.1. This section provides a summary of the national and local planning policy context and evidence that has helped to inform the approach taken within this Interim Planning Position Paper.

### **National Planning Policy (NPPF)**

- 2.2. A revised NPPF was published in December 2024, which sets out several policy considerations that are relevant to this paper.
- 2.3. Chapter 5 (Delivering a sufficient supply of homes) sets out the requirements regarding boosting the supply of homes. The key elements are as follows.
- 2.4. Paragraph 61 notes that the overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community.
- 2.5. Paragraph 63 states that policies should identify the size, type and tenure of homes needed for different groups in the community. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.
- 2.6. Paragraphs 64-66 set out the requirements in relation to affordable housing:
- Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (including the minimum proportion of Social Rent homes required) and expect it to be met on-site unless: a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and b) the agreed approach contributes to the objective of creating mixed and balanced communities.
  - Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).
  - To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.
  - The mix of affordable housing required should meet identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.
- 2.7. Paragraphs 67-68 state that as part of the 'Golden Rules' for Green Belt development set out in paragraphs 156- 157, a specific affordable housing requirement (or requirements) should be set for major development involving the provision of housing, either on land which is proposed to be released from the Green Belt or which may be permitted on land within the Green Belt. This requirement should: a) be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt; and b) require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability).

- 2.8. Paragraph 71 sets out that mixed tenure sites can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported). Mixed tenure sites can include a mixture of ownership and rental tenures, including Social Rent, other rented affordable housing and build to rent, as well as housing designed for specific groups such as older people's housing and student accommodation, and plots sold for custom or self-build.
- 2.9. The revised NPPF makes significant policy changes around Green Belt development. Paragraph 155 sets out the circumstances in which development of homes in the Green Belt should not be regarded as inappropriate, including where (if applicable) the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157.
- 2.10. Paragraph 156 sets out where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application the contributions (or 'Golden Rules') that should be made. This includes the
- a) provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.
- 2.11. Paragraph 157 states that in the absence of up-to-date policies in line with paragraphs 67-68 of NPPF, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default. The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability.
- 2.12. Other relevant updates related to the revised NPPF, are set out below:
- Annex 2 'Glossary' has been updated to define 'Grey Belt' as 'land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'
  - NPPF now places more emphasis on social rent housing over other tenures. To support this, references to the requirement to provide 25% of affordable housing for First Homes has been removed. However, First Homes continue to meet the definition of 'affordable housing' (as defined in a Ministerial Statement published in May 2021) and can still be delivered where appropriate.

## **Planning Practice Guidance (PPG)**

- 2.13. In line with revisions to NPPF several updates were made to PPG which are relevant to the policy positions set out in this paper.
- 2.14. PPG on Effective Use of Land<sup>2</sup> has been updated to include clarification on applying substantial weight applied to brownfield land proposals in line with paragraph 125c of NPPF.
- 2.15. PPG on Green Belt<sup>3</sup> has been updated to provide guidance on assessing Green Belt contributions and identifying grey belt land.
- 2.16. PPG on Viability<sup>4</sup> has been updated to make clear that where development takes place on land situated in, or released from, the Green Belt and is subject to the 'Golden Rules', site specific viability assessments should not be undertaken or taken into account for the purpose of reducing developer contributions, including affordable housing. Where an existing policy is applicable, the uplift percentage applied should be applied regardless of viability. This is to ensure a high bar is set for development within the Green Belt.

## **Places for Everyone (PfE) Joint Development Plan Document**

- 2.17. Places for Everyone (PfE) was adopted on 21 March 2024, becoming part of Oldham's development plan.
- 2.18. JP-H1 of PfE sets out Oldham's housing requirement for 2022 to 2039 (the PfE plan period). Policy JP-H1 identifies a stepped housing requirement (minimum) for Oldham of 404 homes per year for 2022-2025, 680 homes per year for 2025-2030, and 772 homes per year for 2030-2039. This equates to an annual average of 680 new homes per year.
- 2.19. JP-H2 sets out policy to support an increase in the delivery of affordable housing. It sets out that the provision of affordable housing should be set out in local policies and based on evidence of local need. Where possible new developments should deliver mixed communities (avoiding clusters of tenure).
- 2.20. JP-H3 sets out requirements relating to housing type, size and design of new housing and that residential developments should provide an appropriate mix of dwelling types and sizes reflecting local plan policies. The policy also requires that all new homes comply with nationally described space standards and are built to the 'adaptable and accessible' standard in Part M4(2) of the Building Regulations.
- 2.21. JP-H4 sets out minimum densities for new housing development which ensure that development is delivered at a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport and the need to achieve efficient use of land and high-quality design.
- 2.22. JP-D2 sets out the policy for gathering developer contributions as part of new development. It states that developers should provide, or contribute to, the provision of mitigation measures to make the development acceptable in planning terms. These will be secured through either planning conditions, Section 106 planning obligations, Section 278 agreements or CIL. If an applicant wishes to make a case that a

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<sup>2</sup> PPG 'Effective use of land': <https://www.gov.uk/guidance/effective-use-of-land>

<sup>3</sup> PPG 'Green Belt': <https://www.gov.uk/guidance/green-belt>

<sup>4</sup> PPG 'Viability': <https://www.gov.uk/guidance/viability>

development is not viable, they should provide clear evidence at the planning application stage. The Local Planning Authority should determine the weight to be given to a viability assessment alongside other material considerations.

**Oldham's Local Plan – the Joint Core Strategy and Development Management Policies Development Plan Document (2011)**

- 2.23. Oldham's Joint Core Strategy and Development Management Policies Development Plan Document (referred to as our Local Plan) was adopted 9 November 2011.
- 2.24. Policy 3 'An Address of Choice' supports the delivery of housing. It sets out the circumstances where residential development will be permitted (including where it contributes to delivery of the borough's regeneration priorities or local affordable housing needs) and requirements for access to key services for new development. The policy also sets out the expected distribution of housing land, however this part of the policy has been superseded by PfE policy JP-H1 'Scale, Distribution and Phasing of New Housing Development'.
- 2.25. Policy 10 'Affordable Housing' sets out requirements for seeking affordable housing as part of new development. The policy is set out in figure 1 below.



Figure 1 – Local Plan Policy 10 Affordable Housing (as published)<sup>5</sup>

### **Policy 10 Affordable Housing**

All residential development of 15 dwellings and above, in line with national guidance, will be required to provide an appropriate level of affordable housing provision. The current target is for 7.5% of the total development sales value to go towards the delivery of affordable housing, unless it can be clearly demonstrated to the council's satisfaction that this is not viable. This target is based on the findings of the Affordable Housing Economic Viability Assessment (AHEVA) but will be monitored and reviewed over the lifetime of the LDF to ensure that it is still appropriate.

When agreeing the level and nature of affordable housing to be provided the council will have regard to the following:

- a. the size and type of affordable housing to be provided, such as social-rented accommodation or intermediate housing, and how this meets the local affordable housing needs; and
- b. the availability of Social Housing Grant, or equivalent, to support the delivery of the affordable housing; and
- c. the impact of the provision of affordable housing on the economic viability of the development; and
- d. whether the provision of affordable housing would prejudice the delivery of other planning and regeneration objectives.

Affordable housing must be provided on-site, in partnership with a Registered Provider, preferably that belongs to the Oldham Housing Investment Partnership (OHIP) (1) unless there are exceptional circumstances that would justify the acceptance, by the council, of off-site provision within the locality or a financial contribution in lieu of provision.

Exceptional circumstances include:

- e. where the specific characteristics of the residential development proposed mean that the provision of affordable housing is neither practicable or desirable; or
- f. where the council consider the off-site provision within the locality or a financial contribution would meet local affordable housing needs and other planning and regeneration objectives more effectively.

Where a financial contribution is paid and the provision cannot be provided on-site, the priority will be given to off-site provision in the local area followed by off-site provision within the borough.

The council will use planning conditions or obligations to secure delivery of the affordable housing provision, and to ensure that it is occupied in perpetuity by people falling within particular categories of need for affordable housing.

The council will provide further advice and guidance on this policy.

<sup>5</sup> Oldham's Local Plan: [https://www.oldham.gov.uk/downloads/file/1445/development\\_plan\\_document-joint\\_core\\_strategy\\_and\\_development\\_management\\_policies](https://www.oldham.gov.uk/downloads/file/1445/development_plan_document-joint_core_strategy_and_development_management_policies)

2.26. Policy 11 'Housing' sets out that all residential developments must deliver a mix of appropriate housing types, sizes and tenures that meet the needs and demands of the borough's urban and rural communities. The policy is set out in figure 2 below.

Figure 2 – Local Plan Policy 11 Housing (as published)<sup>6</sup>

### **Policy 11 Housing**

All residential development must be appropriate to the area, accessible to public transport and key services, and have regard to the council's plans for the area.

The council will promote the delivery of a mixed housing stock, based on the findings of local evidence which will be monitored and reviewed over the lifetime of the LDF, to ensure that it is still appropriate. Based on our current local evidence this includes:

- a. family housing (three bedrooms and above), particularly within regeneration areas, to widen the choice of housing available and address issues of overcrowding;
- b. a mix of housing within Oldham Town Centre and the centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill as appropriate, to encourage people to live within these areas; and
- c. high-value housing to retain and attract residents throughout the borough.

The council will have regard to the following to determine the appropriate mix on a specific site:

- d. the need to create sustainable and inclusive communities and meet identified housing needs within the site and surrounding area and, in the case of smaller developments the surrounding area; and
- e. the findings of the Greater Manchester and Oldham Strategic Housing Market Assessments (SHMA) (46) and other local evidence identifying housing needs and demands within the borough; and
- f. the location and characteristics of the site, including:
  - i. public transport accessibility and access to key services, consistent with key issue 5 in Table A; and
  - ii. shape, topography, landscape, historic environment and biodiversity features; and
  - iii. surrounding uses and characteristics; and
- g. delivery of wider planning and regeneration objectives.

Houses in multiple occupancy shall not be permitted unless it can be demonstrated that the proposal does not adversely affect: the local character of the area; the residential and workplace amenity of current, future and neighbouring occupants; and traffic levels and the safety of road users.

The Government changed the classification of gardens from 'brownfield' to 'greenfield' in June 2010. As stated in Policy 3, the use of previously developed land and vacant or underused buildings is the council's first preference for residential development and the availability of such land, both in the locality and boroughwide, as assessed by the council's monitoring arrangements, will be the first consideration when regarding applications on 'greenfield' sites. In addition, housing development within an existing residential curtilage shall not be permitted unless it can be demonstrated that the development: is acceptable in terms of design, scale, massing and density; is sensitive and compatible with local character; does not adversely affect the amenity of adjoining dwellings; is acceptable in access and parking arrangements. All residential development must provide adequate garden or other outside amenity space.

The council will provide further advice and guidance on this policy.

## Evidence Base

### Local Housing Needs Assessment (LHNA) (2024)

- 2.27. An update to Oldham's Local Housing Need Assessment (LHNA) has recently been carried out. The 2024 LHNA updates the previously published LHNA (2019), that was prepared as part of the Housing Strategy (2019).
- 2.28. The LHNA is an up-to-date, robust evidence base document which has been prepared to inform existing planning policy and decisions and will inform policy preparation as part of the Local Plan Review. It incorporates:
- Findings from a Household Survey in 2018 (re-weighted using the 2021 Census) which was completed by 2,080 households, representing a 12% response rate from the sample surveyed;
  - An online survey of stakeholders;
  - Interviews with estate and letting agents; and
  - A review of existing (secondary) data.
- 2.29. The main findings of the LHNA are set out below:
- An identified need for 669 affordable homes a year across the borough, over the next 10 years. This represents a significant increase in the number of affordable homes needed since the previously published LHNA in 2018, which identified a need for 203 affordable homes a year.
  - A recommended affordable housing tenure split of 65% social / affordable rent and 35% affordable home ownership.
  - An identified imbalance in the size, mix, and type of new homes required across the borough to meet local housing needs, particularly for 3 bedroomed and larger homes. There is also increasing numbers of people at risk of, or currently experiencing, homelessness in the borough which can only be addressed by the delivery of new affordable housing.
  - In response to the evidence of supply and demand variations by area and property size the LHNA suggests the following total mix of house type and sizes (for all tenures):
    - 60-65% houses, 10-15% flats and 25-30% bungalow/ level-access.
    - 40-45% 1-2 bedroomed, 35-40% 3 bedroomed and 20-25% 4+ bedroomed.
  - For affordable housing, the recommended split is as follows:
    - Affordable/ social rent:
      - 35-40% houses, 30-35% flats and 30-35% bungalow/ level-access.
      - 70-75% 1-2 bedroomed, 20-25% 3 bedroomed and 5-10% 4+ bedroomed.
    - Affordable home ownership:

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<sup>6</sup> Oldham's Local Plan: [https://www.oldham.gov.uk/downloads/file/1445/development\\_plan\\_document-joint\\_core\\_strategy\\_and\\_development\\_management\\_policies](https://www.oldham.gov.uk/downloads/file/1445/development_plan_document-joint_core_strategy_and_development_management_policies)

- 65-70% houses, 15-20% flats and 15-20% bungalow/ level-access.
  - 35-40% 1-2 bedroomed, 40-45% 3 bedroomed and 20-25% 4+ bedroomed.
  - In terms of meeting the needs of other groups, the LHNA has identified a need for 4,869 additional units of accommodation for older people by 2041 including 775 residential care bedspaces, 955 Extra Care units, and 3,139 other types of accommodation including leasehold sheltered.
- 2.30. Further detail on the findings and recommendations of the LHNA are embedded into the position statement sections, as relevant, in the remainder of this paper.

### 3. Overall Housing Mix

- 3.1. It is important that new residential development provides a diverse range of housing that is high-quality and meets the needs of different sections of our population at different life stages.
- 3.2. The LHNA has provided an analysis of dwelling mix underpinned by a demographic scenario model which takes into account projected household change to 2041 (using 2018-based ONS household projections). Based on this, the LHNA has provided recommendations for overall housing type and mix (table 5.1 of the LHNA), as is summarised in table 1 below.
- 3.3. To support flexibility in delivery, dwelling type and mix by tenure is presented as a broad range which also considers household aspirations and expectations.
- 3.4. The table recommends an overall split of housing tenure of 80% market housing and 20% affordable housing – affordable housing tenure broken down further as 12% social/ affordable rent and 8% affordable home ownership<sup>7</sup>.

*Table 1 Summary of Overall Dwelling Type/ Size and Mix by Tenure<sup>8</sup>*

Dwelling type/size	Market	Affordable/ social rented	Affordable home ownership	Total
<b>Overall % split</b>	<b>80%</b>	<b>12%</b>	<b>8%</b>	<b>100%</b>
<b>Dwelling type</b>				
House	70-75%	35-40%	65-70%	60-65%
Flat	2-5%	30-35%	15-20%	10-15%
Bungalow/level-access	25-30%	30-35%	15-20%	25-30%
<b>Size (bedrooms)</b>				
1-2	30-35%	70-75%	35-40%	40-45%
3	40-45%	20-25%	40-45%	35-40%
4+	25-30%	5-10%	20-25%	20-25%

- 3.5. As set out above, the overall dwelling type recommended split is for 60-65% houses, 10-15% flats and 25-30% bungalow/ level-access. The recommend house size split is for 40-45% 1-2 bedroomed, 35-40% 3 bedroomed and 20-25% 4+ bedroomed.
- 3.6. The split is broken down further for market sale homes, affordable/ social rent homes and affordable home ownership, as follows:
- 3.7. Market sale:
  - 70-75% houses, 2-5% flats and 25-30% bungalows/ level-access.
  - 30-35% 1-2 bedroomed, 40-45% 3 bedroomed and 25-30% 4+ bedroomed.

<sup>7</sup> Affordable housing as defined by NPPF Annex 2 'Glossary'.

<sup>8</sup> Adapted from Table 5.1 of the LHNA (2024).

- 3.8. Affordable/ social rent:
- 35-40% houses, 30-35% flats and 30-35% bungalow/ level-access.
  - 70-75% 1-2 bedroomed, 20-25% 3 bedroomed and 5-10% 4+ bedroomed.
- 3.9. Affordable home ownership:
- 65-70% houses, 15-20% flats and 15-20% bungalow/ level-access.
  - 35-40% 1-2 bedroomed, 40-45% 3 bedroomed and 20-25% 4+ bedroomed.
- 3.10. Table 5.2 of the LHNA provides further guidance on the recommended housing mix by tenure and district.
- 3.11. The LHNA has also looked at the need for specialist housing, including housing for older people and disabled people. It has found that there is a need for 4,869 additional units of accommodation for older people by 2041, including 775 residential care bedspaces, 955 Extra Care units and 3,139 other types of accommodation, including leasehold sheltered, enhanced sheltered and Extra Care for sale. Oldham has a good supply of dementia-friendly older persons accommodation through existing provision.
- 3.12. The LHNA update recommends strengthening policies to enable people to live in their own homes for longer with appropriate support and adaptation. This will be considered as part of the Local Plan Review as appropriate.
- 3.13. In line with PfE JP-H3, the LHNA also sets out that all new homes should be accessible and adaptable (M4(2) Standard), which would include bungalows/ level access accommodation. It also recommends that 5% of all new homes should be wheelchair accessible (M4(3) Standard).
- 3.14. This recommended dwelling type/ size split reflects the needs of local residents and demographic data which shows Oldham has an ageing population, meaning there is expected to be an increase in the need for level-access housing, which cannot be met by the existing housing stock.

### **Policy Position – Housing Mix**

In line with PfE policy JP-H3 and Local Plan policy 11, the LHNA (2024) provides key updated evidence to inform local housing mix (dwelling type and size), through these policies.

As such, all new residential development should be informed by the recommended mix set out in Table 1 above, as appropriate to the tenure of development proposed.

Alternative housing mixes will be acceptable where appropriate and to provide a specific type of development, in line with local housing needs.

PfE policy JP-H3 requires that all new dwellings should comply with nationally described space standards and should be built to 'accessible and adaptable' standard. of M2 (2) Building Regulations.

Where relevant, the evidence of specialist housing need, including that for older and disabled people, set out within the LHNA, should be used to inform proposals for specialist housing need, as appropriate.

## 4. Affordable Housing Requirements

- 4.1. The LHNA (2024) provides updated evidence on the need for the affordable housing across the borough.
- 4.2. The LHNA has identified a net shortfall of affordable housing of 669 homes each year. Modelling assumes this is the shortfall each year, over a 10-year period. This is a marked increase on the 203 homes each year as reported in the 2018 LHNA and reflects the overall increase in need, and the increasing cost of the private rented sector and freezing of housing benefit support since 2020.
- 4.3. Whilst the planning process is only expected to support a proportion of this need, it is important that our planning policies ensure affordable homes are delivered as part of new residential development to create mixed communities and to meet local housing needs.
- 4.4. In line with paragraph 64 of NPPF the council will seek the provision of affordable housing as part of new residential development through policy 10 of the Local Plan (see figure 1) (and in line with PfE policy JP-H2).

### Threshold

- 4.5. Local Plan Policy 10 sets out that ‘all residential development of 15 dwellings and above, in line with national guidance, will be required to provide an appropriate level of affordable housing provision. The current target is for 7.5% of the total development sales value to go towards the delivery of affordable housing, unless it can be clearly demonstrated to the council’s satisfaction that this is not viable.’
- 4.6. Paragraph 65 of NPPF sets out that ‘provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).’
- 4.7. NPPF Annex 2: Glossary defines major developments as ‘development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more’<sup>9</sup>.
- 4.8. Annex 1 of NPPF makes clear that *‘policies in this Framework are material considerations which should be taken into account in dealing with applications ...existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).’*<sup>10</sup>
- 4.9. Therefore, having regard to Annex 1 and paragraph 65, the council should give less weight to the published threshold aspect of Policy 10 of the Local Plan (15 homes) in the consideration of new housing schemes. As having regard to the significant change in national planning policy over the last 14 years, since the publication of the current Local Plan, it is clear that amendments to NPPF have limited impacted the thresholds for gathering developer contributions, including that of the provision of affordable housing, to all major schemes (as per the definition of major development set

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<sup>9</sup> NPPF Annex 2: Glossary – Definition of ‘Major Development’: <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

<sup>10</sup> Paragraphs 231-232 Annex 1 of NPPF.



out NPPF Annex 2: Glossary). In addition, several policy amendments within the revised NPPF demonstrate that a greater weight is placed on the delivery of affordable housing.

- 4.10. Moreover, the LHNA has identified that need for affordable housing across the borough has increased (since the previous LHNA in 2018), whilst in real terms viability of schemes has also increased meaning a greater number of major schemes within the borough are making an on or off-site affordable housing provision. In addition, the council has recently declared an affordable housing crisis in 2024<sup>11</sup> – which is further evidence of the need for affordable homes in the borough.
- 4.11. In this regard, considering the amended position, wider aims of the NPPF and updated evidence of local affordable housing need - it is appropriate to use the threshold of 10 homes (major development), as defined in NPPF, in the application of Policy 10. This position remains unchanged to that set out within the previously published Affordable Housing Interim Planning Position Paper (2022).

#### **Policy Position – Affordable Housing Threshold**

In line with paragraph 65 of NPPF and considering the evidence of affordable housing need set out in the LHNA, the council considers it appropriate to continue to apply Local Plan Policy 10 in securing the provision of affordable housing, but that this should be on developments of 10 homes or more (in line with the definition of 'Major Development' set out in Annex 2 of NPPF). This approach will be reviewed as part of the Local Plan Review.

#### **Affordable Housing Tenure**

- 4.12. As set out in Section 3 above, the LHNA recommends an overall split of housing tenure of 80% market housing and 20% affordable housing.
- 4.13. Analysis within the LHNA has carefully considered the range of affordable tenures that may be appropriate for existing households in need and newly-forming households, in the borough<sup>12</sup>.
- 4.14. The analysis has identified that an overall affordable housing tenure split of 65% social/ affordable rented and 35% affordable home ownership across Oldham Borough, would be appropriate.
- 4.15. In calculating the tenure mix, analysis has considered the tenure preferences and incomes of existing and newly-forming households. It also recognises the increased emphasis on delivering social rented affordable dwellings as part of new affordable housing supply (and reinforced in NPPF paragraphs 63-64 and 66).
- 4.16. First Homes are a type of affordable housing tenure, which must be sold at least 30% below the open market value to those who meet defined eligibility criteria. Whilst First Homes continue to meet the definition of 'affordable housing' (as defined in a Ministerial Statement published in May 2021<sup>13</sup>), the requirement to deliver a minimum

<sup>11</sup> Oldham Council – [Building a local response to a national housing crisis | Oldham Council](#)

<sup>12</sup> See Technical Appendix C of the LHNA (2024) for the Housing Need Calculations (Affordable Housing).

<sup>13</sup> Affordable Housing Ministerial Statement (incl. First Homes), May 2021: <https://questions-statements.parliament.uk/written-statements/detail/2021-05-24/hlws48>

of 25% of affordable housing as First Homes, no longer applies. First Homes can still be delivered through s106 and on exception sites.

- 4.17. In this context, where appropriate, First Homes could be included as part of the 35% affordable home ownership tenure split.
- 4.18. Further guidance on First Homes is available online<sup>14</sup>.

#### **Policy Position – Affordable Housing Tenure**

In line with NPPF paragraph 66, the LHNA provides updated evidence on local housing needs. For affordable housing, the LHNA identifies a suggested tenure split of 65% social / affordable rent and 35% affordable home ownership (including First Homes, where appropriate).

In the application of Local Plan policy 10 and 11, affordable housing provided as part of new residential development should be informed by this split, as appropriate. Exceptions may be acceptable owing to funding requirements or evidence of need for a particular type of housing being presented.

#### **Exceptions to providing Affordable Housing**

- 4.19. Exceptions to providing affordable housing as part of new development are set out within policy 10 of the Local Plan. These exceptions will be agreed by the council based on the evidence submitted as part of a planning application.

#### **Vacant Building Credit (VBC)**

- 4.20. In addition to the exceptions set out in policy 10 of the Local Plan, paragraph 65 of NPPF sets out that:

*‘to support the reuse of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by an appropriate amount [equivalent to the existing gross floorspace of the existing building].’*

- 4.21. This is termed ‘Vacant Building Credit’ (VBC). VBC works through the deduction of a financial ‘credit’, equivalent to the existing gross floorspace of any relevant vacant buildings within the redline boundary of the application site brought back into lawful use or demolished for redevelopment, from the overall affordable housing contribution calculation sought from relevant residential development schemes.
- 4.22. For example, where a building with a gross floorspace of 8,000 square metre building is demolished as part of a proposed development with a gross floorspace of 10,000 square metres, any affordable housing contribution should be a fifth of what would normally be sought as it would be applied to only 2,000 square metres. This will apply in calculating either the number of affordable housing units to be provided within the development or where an equivalent financial contribution is being provided.
- 4.23. As set out in PPG<sup>15</sup>, VBC does not apply to vacant buildings which have been abandoned (see below for further information). In considering how the vacant building credit should apply to a particular development, local planning authorities should have

<sup>14</sup> First Homes Guidance: <https://www.gov.uk/guidance/first-homes>

<sup>15</sup> PPG ‘Planning Obligations’, paragraphs 26-28: <https://www.gov.uk/guidance/planning-obligations>

regard to the intention of national policy. In doing so, it may be appropriate for authorities to consider:

- 4.24. The council will determine on a case-by-case basis whether a building is vacant or abandoned and whether it is appropriate to apply VBC. Details regarding the type of information that may be required to inform the decision and support a relevant planning application is set out below.

Criteria for applying Vacant Building Credit

- 4.25. The criteria for applying VBC are as follows:

- 1) The site must meet the NPPF definition of 'Previously Developed Land' (NPPF, Annex 2 Glossary).
- 2) The building must meet the Council's definition of a 'Vacant Building' and must not have been abandoned (see below). The whole building should be vacant for VBC to apply.
- 3) The building must not have been made vacant for the sole purposes of redevelopment. The applicant must demonstrate that vacancy has arisen for other reason.
- 4) If the proposal is covered by an extant or recently expired planning permission for the same or substantially the same development or has there been an application submitted but not determined since the VBC was reintroduced and VBC not sought, VBC will not apply.

Definition of a vacant building when applying Vacant Building Credit

- 4.26. Like many authorities, Oldham will use the Community Infrastructure Levy (CIL) definition of a vacant building for this interim planning position. The CIL defines a vacant building as "a building that has not been in continuous use for any 6 month period during the last three years". A 'building' does not include buildings: into which people do not normally go; into which people go only intermittently for the purpose of maintaining or inspecting machinery; or for which planning permission was granted for a limited period.
- 4.27. Whilst Oldham does not have CIL, the CIL definition of a vacant building provides a clear vacancy period which takes into consideration the requirements of Policy 14 of the Local Plan. For employment sites, one of the Policy 14 criteria is that adequate marketing (as agreed with the council) is carried out to determine the site's viability/suitability for the identified employment use. It is important to ensure that Oldham's employment sites are protected from development. This interim position does not supersede any requirements set out within Policy 14.

### Abandoned buildings

4.28. In deciding whether a use has been abandoned, account should be taken of all relevant circumstances, such as:

- the condition of the property
- the period of non-use
- whether there is an intervening use; and
- any evidence regarding the owner's intention.

### Vacant Building Credit and Outline Planning Applications

4.29. When considering outline planning applications, it may not be clear what the actual number of dwellings, or the size of those dwellings, may be. Therefore, it will be difficult to quantify what vacant building credit will be applicable at this stage.

4.30. Where the local planning authority agrees that the VBC may be applicable, the applicant will be expected to enter into a Section 106 Agreement at the Outline stage to enable the matter to be deferred to a later stage when the relevant details of the scheme have been finalised. If the VBC is applicable to the proposed site, the information on floor space will inform the level of affordable housing contributions.

### Vacant Building Credit Statement

4.31. In order to apply for the VBC, a VBC Statement must be submitted alongside a planning application. The following information will need to be included in the Statement:

- Evidence that any referenced building is a 'vacant building', in line with that set out above.
- The whole building must be vacant to apply for VBC.
- Evidence that any referenced building is not an 'abandoned building' or vacated solely for the purpose of redevelopment. The onus will be on the applicant to demonstrate this. The factors the council will take into account are set out above.
- Information on the existing Gross Internal Floor Area (GIFA) and the proposed GIFA<sup>16</sup>. GIFA is the area of a building measured to the internal face of the perimeter walls at each floor level.

4.32. The council encourages the above information to also be submitted, where possible, as part of any pre-application discussion so that the potential application of VBC can be considered at the earliest stage.

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<sup>16</sup> The Royal Institution of Chartered Surveyors (RICS) definition of GIFA will be used for the purposes of assessing VBC, available at: [https://www.rics.org/content/dam/ricsglobal/documents/standards/May\\_2015\\_Code\\_Of\\_Measuring\\_Practice\\_6th\\_Edition.pdf](https://www.rics.org/content/dam/ricsglobal/documents/standards/May_2015_Code_Of_Measuring_Practice_6th_Edition.pdf)

### **Policy Position – Vacant Building Credit**

In line with paragraph 65 of NPPF, Vacant Building Credit may be applied to reduce the affordable housing contribution where the proposed development would meet the required criteria, as follows:

1. The site must meet the NPPF definition of 'Previously Developed Land' (NPPF, Annex 2 Glossary).
2. The building must meet the Council's definition of a 'Vacant Building' and must not have been abandoned (see below). The whole building should be vacant for VBC to apply.
3. The building must not have been made vacant for the sole purposes of redevelopment. The applicant must demonstrate that vacancy has arisen for other reason.
4. If the proposal is covered by an extant or recently expired planning permission for the same or substantially the same development or has there been an application submitted but not determined since the VBC was reintroduced and VBC not sought, VBC will not apply.

Further clarifications and guidance in relation to these criteria is set out in the sections above.

## 5. Housing in the Green Belt

- 5.1. As set out in section 2 of this paper, paragraph 155(d) of the (revised) NPPF sets out that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157.
- 5.2. Golden Rule 'a)' sets out the requirement for a contribution to affordable housing. It states that affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below, should be provided.
- 5.3. Oldham does not have a development plan policy which is in line with paragraph's 67-68, at present. As such, in the application of this Golden Rule, paragraph 157 applies, until the local affordable housing policy is updated through the Local Plan Review.
- 5.4. Paragraph 157 sets out that the affordable housing contribution required to satisfy the Golden Rule is **15 percentage points** above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%<sup>17</sup>.
- 5.5. The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in the updated PPG on viability.
- 5.6. Until it is updated, the requirement set out in Oldham's existing Local Plan – Policy 10 – applies. Policy 10 sets out that the current target is for '7.5% of the total development sales value to go towards the delivery of affordable housing, unless it can be clearly demonstrated to the council's satisfaction that this is not viable'.
- 5.7. **In the calculating the amount of affordable housing required by this Golden Rule, the number of dwellings that equates to 15% of the proposed number of dwellings on the development will be added to the number of dwellings that is the equivalent of 7.5% of the total development sales value.**

### Example

Total site capacity = 200 homes

7.5% of GDV (in this example) = 40 homes

15% of site capacity = 30 homes

Therefore, affordable housing requirement applying the Golden Rule = **70 homes to be for affordable housing.**

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<sup>17</sup> Footnote 60 of NPPF sets out that the 50% cap does not apply to rural exception sites or community-led development exception sites, or if the local planning authority has a relevant existing policy, which would apply to the development, which is above 50%.

- 5.8. Where, with the addition of the 15%, the amount of affordable housing would go above 50% of the site capacity, the amount of affordable housing required will be subject to a cap at 50% of the site capacity. For example, a site of 200 homes in the Green Belt, would be expected to provide no more than 100 homes as affordable. The 50% cap does not prevent a developer from agreeing to provide affordable housing contributions which exceed the cap.
- 5.9. In terms of viability, updated PPG18 is clear that where development takes place on land situated in, or released from, the Green Belt (not including sites released from the Green Belt through PfE) and is subject to the 'Golden Rules', site specific viability assessments should not be undertaken or taken into account for the purpose of reducing developer contributions, including affordable housing. Where an existing policy is applicable, the uplift percentage applied should be applied regardless of viability. This is to ensure a high bar is set for development within the Green Belt.

#### **Policy Position – Applying Golden Rule a) Affordable Housing**

In line with NPPF, where the development of homes is proposed within the Green Belt, the 'Golden Rules' will apply. In terms of affordable housing, Golden Rule a) applies and will be sought in conjunction with policy 10 of the Local Plan, in line with paragraph 157 of NPPF.

In calculating the number of affordable homes required under this Golden Rule, calculate what 15% of the number of dwellings being created on the site would be and add that to the number of dwellings that is the equivalent of 7.5% of the total development sales value. An example is provided above to assist in application.

As set out in NPPF, the use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in PPG on viability.

Affordable housing tenure should be considered in line with Local Plan policy 11 and the guidance provided in section 4 of this paper.

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<sup>18</sup> PPG 'Viability', Paragraph: 029 Reference ID: 10-029-20241212: <https://www.gov.uk/guidance/viability>

## 6. Conclusion

- 6.1. This Interim Planning Position Paper supports the implementation of policies within Oldham's Local Plan – The Joint Core Strategy and Development Management Development Plan Document, adopted November 2011.
- 6.2. This paper supersedes the previous 'Affordable Housing Interim Planning Position Paper' published by the council in March 2022.
- 6.3. The paper sets out the council's updated position in relation to:
  - Housing mix – size, type and tenure – including housing mix for affordable housing;
  - Affordable housing requirements, including affordable housing thresholds and exceptions (including the application of Vacant Building Credit).
  - Housing in the Green Belt including the application of the affordable housing 'Golden Rule'.
- 6.4. The paper should be used as guidance for developers in preparing development proposals and as a material consideration when assessing planning applications and development proposals for residential development.
- 6.5. It must be read alongside PfE and the Local Plan as a whole, but in particular - PfE policy JP-H2 'Affordability of New Housing', JP-H3 'Type, Size and Design of New Housing' and also policy 3 'Address of Choice', policy 10 'Affordable Housing' and policy 11 'Housing' of Oldham's Local Plan.
- 6.6. This paper is informed by the council's LHNA (2024). The LHNA is a key evidence base document and sets out information on local housing needs of different groups (including affordable housing, provision for older people and disabled people), housing mix – including size, tenure and type, and sets out recommendations and policy guidance.
- 6.7. The council's approach to updated national guidance and local evidence will be considered further and inform policy preparation as part of the Local Plan Review.





## Report to CABINET

# Housing Delivery Test Action Plan 2025

### Portfolio Holder:

Councillor Arooj Shah, Leader of the Council and Cabinet Member for Growth, and Councillor Elaine Taylor, Deputy Leader and Cabinet Member for Neighbourhoods

**Officer Contact:** Emma Barton (Deputy Chief Executive of Place)

**Report Author:** Abigail Bailey (Housing Delivery)  
**Ext.**

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**16<sup>th</sup> June 2025**

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### Reason for Decision

To seek approval for the publication of Oldham Council's Housing Delivery Test Action Plan (2025 update).

### Executive Summary

This report provides an update on the Housing Delivery Test (HDT) position in respect of Oldham. It also sets out an updated position to the previous Housing Delivery Test Action Plan published in July 2024.

The HDT was 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. The thresholds for consequences for under-delivery remain as per the National Planning Policy Framework (NPPF).

The latest HDT results (and which will be reported in the HDT Action Plan 2025)<sup>1</sup> were published 19 December 2024<sup>2</sup>.

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<sup>1</sup> Note - the HDT results are usually published in January of each year and look back over the previous three full financial years. Due to the preparation of an amended NPPF (September 2023), the publication of the HDT measurement for 2023 was delayed until December 2024. The 2023 measurement assesses housing delivery over the period of 2020/21-2022/23.

<sup>2</sup> [Housing Delivery Test: 2023 measurement - GOV.UK](https://www.gov.uk/government/statistics/housing-delivery-test-2023-measurement)

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As per the latest measurement, Oldham has delivered 91% of its housing need over the past three years (2021/22 to 2022/23). This is the same as the 2021 and 2022 measurement result (91%) and an improvement from the 2020 result of 80%.

The pass rate for the HDT is now 95%. There are consequences of not achieving 95% in the HDT that require some form of action, as set out in the NPPF.

As Oldham has delivered 91% of the housing required, we are required to prepare an Action Plan to address housing delivery. Oldham's previous Action Plan was published in July 2024, as such it is proposed to update the Action Plan as required. Action Plans should be published within six months from the measurement publication date.

This is Oldham Council's fifth Action Plan, drawn up in response to the Housing Delivery Test: 2023 Measurement, published December 2024. It provides an update on previously published Action Plans and includes information on:

- the root causes for housing under-delivery within Oldham (contained in Part 1); and
- how the council intends to improve delivery (contained in Part 2).

## **Recommendations**

- i. To have regard to the agreed comments of the Place, Economic Growth and Environment Scrutiny Board on this item from the meeting on 12th June 2025;
- ii. To note that this item will be exempt from call-in, under Rule 14 of the Constitution, as the report has already been considered by the Place, Economic Growth and Environment Scrutiny Board; and
- iii. To approve the Housing Delivery Action Plan 2025 (Part One and Part Two) for publication in line with the requirements of the Housing Delivery Test: 2023 Measurement results.

## Housing Delivery Test Action Plan (2025)

### 1 Background

- 1.1 The HDT was introduced by the Government following the publication of the Housing White Paper in 2017 and with further details set out in the National Planning Policy Framework (NPPF). The HDT is an annual measurement of housing delivery (net additional dwellings) compared to the number of homes needed for an area (local housing need). The methodology for applying the HDT is shown below.

$$\text{Housing Delivery Test (\%)} = \frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

- 1.2 The test measurement is a 'delivery rate' percentage of the number of homes built against the number of homes needed for an area (see above). The pass rate for the HDT is now 95%<sup>3</sup>.
- 1.3. The consequences of failing the Test are set out in the revised National Planning Policy Framework (NPPF):
- less than 95% - an Action Plan must be prepared;
  - less than 85% - the LPA must identify a 20% buffer of additional deliverable sites for housing on top of their existing 5-year housing land supply. This is in addition to an Action Plan but can form part of the 6-10 and 10 years plus supply, moved forward.
  - less than 75% - the presumption in favour of sustainable development must be applied. This is in addition to the 20% buffer and Action Plan.
- 1.4 The latest HDT results were published on 19 December 2024<sup>4</sup>, by the Ministry of Housing Communities and Local Government (MHCLG) using the previous three complete financial years of 2020/21, 2021/22 and 2022/23. The results for Oldham are shown in the table below.

Table 1: Housing Delivery Test: 2023 Measurement (published December 2024)

	<b>Total number of homes required (2020-2023)</b>	<b>Total number of homes delivered (2020-2023)</b>	<b>Housing Delivery Test: 2023 Result</b>	<b>Housing Delivery Test 2023 Consequence</b>
Oldham	1,542	1,406	91%	Action Plan

- 1.5 The number of homes required in 2020/21 was 461. The number of homes required in 2021/22 was 677. The number of homes required in 2022/23 was 404. Therefore, the total number of homes required for 2020-2023 was 1,542 homes.
- 1.6 It is important to note that the impact of Covid-19 on housing delivery has been considered and is reflected in the 2023 results. As such, the 'number of homes required' was reduced

<sup>3</sup> In previous years, transitional arrangements have applied which allowed a lower 'pass rate' to allow for the test to bed-in. These no longer apply.

<sup>4</sup> HDT Results 2023: [Housing Delivery Test: 2023 measurement - GOV.UK](#) (Published 2024)

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within the 2020 to 2021 year by 4 months. The thresholds for consequences for under-delivery have been maintained, as set out in NPPF (see paragraph 1.3).

- 1.7 Oldham Council has delivered 91% of the homes required over the measurement period. As a result, considering the HDT consequences, the council is therefore required to prepare an Action Plan to assess the cause of under-delivery and identify actions to increase delivery in future years. National planning guidance requires action plans to be in place within 6 months of publication of the HDT measurement.
- 1.8 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. This Action Plan (2025) updates the previous Action Plan published in December 2024 and is Oldham's fifth plan.

#### Previous HDT Results

- 1.9 Since the introduction of the Housing Delivery Test in 2018, Oldham's housing delivery has improved. The results for this year compared to previous years are set out in table 2 below.

Table 2: Oldham's Housing Delivery Test Results (2018-2023)

HDT Measurement Year <sup>5</sup>	Delivery Rate % (HDT Result)
2018	64%
2019	65%
2020	80%
2021	91%
2022	91%
2023	91%

- 1.10 As shown in table 2, on average housing delivery has increased by 27% since the 2018 measurement.

#### Housing Delivery Test Action Plan 2025

- 1.11 The Action Plan is produced in two parts. Part One provides an analysis of housing needs, delivery and supply, and sets out a summary of findings and key issues related to housing delivery.
- 1.12 Informed by Part One, Part Two identifies key actions and responses for improving housing delivery. The actions, aimed at increasing delivery across the borough, are structured around the following themes:
- Improving capacity and processes.
  - Increasing the delivery of sites within our housing land supply, particularly on brownfield land.
  - Delivery of the council's ambitions to improve and increase the housing offer within Oldham.
- 1.13 It also includes a progress update to actions set out within previous Action Plans, and new actions are added as appropriate.

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<sup>5</sup> Measuring housing delivery compared to housing required over the previous three years. I.e. the 2023 measurement looks at housing delivery over the years 2020-2023.

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### Housing Crisis

- 1.14 In February 2024, at a Housing Roundtable event, Oldham Council declared a housing crisis<sup>6</sup>. The national housing crisis is having a local impact within Oldham. There are several components of the national housing crisis, including a significant under-supply of housing, worsening affordability (and a lack of affordable housing options), an ageing population and the increased cost of living. To a differing extent, these issues are having an impact within Oldham.
- 1.15 Currently there is a shortage of affordable housing to meet the demand on Oldham's Housing Needs Register (currently 8,164 homes are needed but only 1,211 homes are available). There are also increasing numbers of people in temporary accommodation – between June 2020 and March 2025 the number of people in temporary accommodation increased by over 200% (219 households in June 2020 to 642 households in February 2025). In addition, it is important that we have suitable housing options for older people and those with specialist needs, to meet growing demand. Further analysis of Oldham's housing issues and needs is provided in part 1 of the Action Plan.
- 1.16 At the Roundtable event senior representatives from all of Oldham's major social housing providers, private landlords, letting agents, developers and housebuilders and charities, met to discuss Oldham's housing crisis and how partners can work together to tackle it. Several important actions and commitments came out of the event which have informed this Action Plan, including a commitment by the council and its partners, to delivering 500 social homes by 2029.
- 1.17 In addition to the commitment to deliver social homes, our response to the housing crisis includes a series of other priorities which are aimed at meeting local housing needs, including tackling empty homes - bringing them back into use, and identifying a residential pipeline of future housing sites across the borough and supporting their delivery for a range of housing types.
- 1.18 This Action Plan is framed in the context of Oldham's housing crisis declaration and specific actions within the Action Plan (contained in part 2) are directly related to meeting Oldham's local housing needs.

### Engagement

- 1.19 Stakeholder engagement is important to understand issues with delivery as stakeholders, such as developers and registered providers, directly impact the rate of delivery. This Action Plan has been informed by several forms of engagement, including the council's Housing Roundtable event in 2024.
- 1.20 Future engagement events are being planning, with a further Roundtable event planned for Spring 2025.
- 1.21 In addition, regular engagement with key housing delivery stakeholders, such as housing providers and developers, is carried out through the Strategic Housing Group, who meet to discuss issues and actions related to housing delivery.

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<sup>6</sup> Oldham Council Housing Roundtable Event, February 2024:

[https://www.oldham.gov.uk/news/article/2618/tackling\\_the\\_housing\\_crisis\\_500\\_new\\_social\\_homes\\_coming\\_to\\_oldham\\_announced\\_at\\_oldham\\_housing\\_roundtable\\_event](https://www.oldham.gov.uk/news/article/2618/tackling_the_housing_crisis_500_new_social_homes_coming_to_oldham_announced_at_oldham_housing_roundtable_event)

- 
- 1.22 Furthermore, as part of the engagement carried out for previous HDT Action Plans (including a developer questionnaire), several reasons for the under-delivery of housing were found and potential solutions identified. Many of these are still applicable and the evidence continues to inform actions identified for improving housing delivery within this Action Plan (as identified in part 2).

### Looking Forward

- 1.23 Although not included within the 2023 HDT measurement, the housing completions for 2023/24 were 420 homes and for 2024/25 were 578 homes. These figures will contribute to future HDT measurements and in the 2025 HDT measurement, based on these figures, it is expected that Oldham will have delivered more than the required number of homes (over the three-year monitoring period – 2022/23 to 2024/25).
- 1.24 Oldham's housing requirement within PfE increases from 404 homes per year (2022-2025) to 680 homes per year (2025-2030), as such it remains important to support the delivery of housing, especially the delivery of the identified medium-term sites within the housing land supply, as set out in the HDT Action Plan.

### Conclusions

- 1.25 The HDT Rule Book requires authorities whose housing delivery is below 95% of their identified housing need to publish an Action Plan. This is also set out in NPPF.
- 1.26 This is Oldham Council's fourth Action Plan, drawn up in response to the Housing Delivery Test: 2023 Measurement, published December 2024. The Action Plan is contained in two parts:
- Part One contains an analysis of housing needs, delivery and supply;
  - Part Two sets out actions to address housing delivery issues and improve housing delivery.

## **2 Current Position**

- 2.1 The HDT Rule Book requires authorities whose housing delivery is below 95% of their identified housing need to publish an Action Plan. This is also set out in NPPF. Authorities are required to publish an Action Plan within 6 months of the publication of the measurement.
- 2.2 This is Oldham Council's fifth Action Plan, drawn up in response to the Housing Delivery Test: 2023 Measurement, published December 2024.

## **3 Options/Alternatives**

- 3.1 Option 1 – To approve the Housing Delivery Action Plan 2025 for publication in line with the requirements of the Housing Delivery Test: 2023 Measurement results (published December 2024).
- 3.2 Option 2 – To not approve the Housing Delivery Test Action Plan 2025 for publication. This would not comply with the requirements of the Housing Delivery Test Rule Book and the Housing Delivery Test: 2023 Measurement results (published December 2024).

## **4 Preferred Option**

- 
- 4.1 The HDT Rule Book requires authorities whose housing delivery is below 95% of their identified housing need to publish an Action Plan. This is also set out in NPPF.
- 4.2 As such, option one is the Preferred Option - To approve the Housing Delivery Action Plan 2025 (Part One and Part Two) for publication in line with the requirements of the Housing Delivery Test: 2023 Measurement results (published December 2024) – to comply with national planning policy requirements.
- 5 **Consultation**
- 5.1 Internal consultation with relevant officers has been carried out as appropriate. Public consultation is not required as this is a technical document which is required to be produced in response to national planning policy requirements.
- 6 **Financial Implications**
- 6.1 There are no direct financial implications from approving the Housing Delivery Action Plan for publication. The number of new homes delivered within Oldham will impact on the overall Council Tax base. Any implications will be reflected in the calculation of the Council Tax Base for future financial years. The Tax Base is prepared and presented to Cabinet for approval on an annual basis prior to consideration of the Council's Revenue Budget and Medium-Term Financial Strategy
- (Mohammed Hussain)
- 7 **Legal Implications**
- 7.1 Paragraph 79 of the National Planning Policy Framework requires local planning authorities to monitor progress in building out sites that have planning permission and where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years. The Council is therefore required to produce an action plan. (A Evans)
- 8 **Equality Impact, including implications for Children and Young People**
- 8.1 Yes
- A red square icon with a white document symbol and the letters 'PDF' in the center.
- IAReport\_Housing  
Delivery Test Action P
- The tool identified that the Housing Delivery Test Action Plan had neutral effects on the equality characteristics. There were some moderate positive effects on the council's corporate priorities of green and growing, happier and healthier lives and a great place to live. The HDT was found to have strong positive effects on the future housing provision in the borough and supporting the corporate priority, a great place to live.
- 9 **Key Decision**
- 9.1 Yes
- 10 **Key Decision Reference**
-

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11.1 ESR-10-25

## 12 **Background Papers**

12.1 The following is a list of background papers on which this report is based in accordance with the requirements of Section 100(1) of the Local Government Act 1972. It does not include documents which would disclose exempt or confidential information as defined by the Act:

- Housing Delivery Test Measurement 2023:  
[Housing Delivery Test: 2023 measurement - GOV.UK](#)

## 13 **Appendices**

13.1 Appendices for this report are as follows:

- Housing Delivery Test Action Plan 2025 - Part One – Oldham’s Housing Delivery
- Housing Delivery Test Action Plan 2025 - Part Two – Action Plan
- Housing Delivery Test Action Plan 2025 – Part Two – Appendix 2 Key Housing Sites



# **Oldham's Housing Delivery Action Plan: Part One**

**June 2025**

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## 1 Introduction

### Purpose of the Report

- 1.1. This Action Plan provides an analysis of housing delivery across Oldham and identifies potential housing delivery issues within Oldham (set out in Part 1). Part 2 (which is contained in a separate document) sets out how the council intends to improve delivery to ensure that we provide a diverse Oldham Housing Offer which is attractive and meets the needs of different sections of the population at different stages of their lives.
- 1.2. The Housing Delivery Test (HDT) was 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 number of homes required over the same period. Results on performance for each local planning authority in England are published annually.
- 1.3. The consequences of failing the Test are set out in the revised National Planning Policy Framework (NPPF) and are:
  - less than 95% - an Action Plan must be prepared.
  - less than 85% - the Local Planning Authority (LPA) must identify a 20% buffer of additional deliverable sites for housing on top of their existing 5-year housing land supply. This is in addition to an Action Plan and can be taken from the 6-10 and 10 years plus supply, moved forward.
  - less than 75% - the presumption in favour of sustainable development must be applied. This is in addition to the 20% buffer and Action Plan.
- 1.4. The latest HDT results were published on 19 December 2024<sup>1</sup>, by the Ministry of Housing Communities and Local Government (MHCLG) using the previous three complete financial years of 2020/21, 2021/22 and 2022/2023. The results for Oldham are shown in Table 1 below.

Table 1: Housing Delivery Test: 2023 Measurement (published December 2024)

	<b>Total number of homes required (2020-2023)</b>	<b>Total number of homes delivered (2020-2023)</b>	<b>Housing Delivery Test: 2023 Result</b>	<b>Housing Delivery Test 2023 Consequence</b>
<b>Oldham</b>	1,542	1,406	91%	Action Plan

<sup>1</sup> HDT Results 2023: [Housing Delivery Test: 2023 measurement - GOV.UK](https://www.gov.uk/government/statistics/housing-delivery-test-2023-measurement)

- 1.5. The number of homes required in 2020/21 was 461. The number of homes required in 2021/22 was 677. The number of homes required in 2022/23 was 404. Therefore, the total number of homes required for 2020-2023 was 1,542 homes.
- 1.6. It is important to note that the impact of Covid-19 on housing delivery has been considered and is reflected in the 2023 results, as the 'number of homes required' was reduced within the 2020/21 year by 4 months. The thresholds for consequences for under-delivery have been maintained, as set out in NPPF (see paragraph 1.3 above).
- 1.7. Oldham Council has delivered 91% of the homes required over the measurement period. As a result, considering the HDT consequences, the council is required to prepare an Action Plan to assess the cause of under-delivery and identify actions to increase delivery in future years.
- 1.8. 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. This Action Plan updates the previous Action Plan published in July 2024 and is Oldham's fifth plan.

### **Relationship to other Strategies and Plans**

- 1.9. This Action Plan complements several existing council aims, plans, policies and strategies which together provide a framework for the delivery of the council's housing priorities. These are summarised below.

#### *Oldham's Housing Crisis*

- 1.10. In February 2024 Oldham Council declared a housing crisis. The national housing crisis is having a local impact within Oldham. As is set out within section 2 of this document, there are several components of the national housing crisis, including a significant under-supply of housing, worsening affordability (and a lack of affordable housing options), an ageing population and the increased cost of living.
- 1.11. These issues are being experienced within Oldham. Currently there is a need for 7,954 homes on the Council's Housing Needs Register, but only 816 homes available. (approximately 68 per month).
- 1.12. There are increasing numbers of people in temporary accommodation – between June 2021 and February 2025 the number of people in temporary accommodation increased by over 300%. Further analysis of Oldham's housing needs is contained within section 2 of this document.
- 1.13. There is a particular need for social homes within Oldham that provide a truly affordable housing option.
- 1.14. The number of social homes being built across England has dramatically reduced over the past decade. Shelter have reported that the severe lack of social housing is the main cause of England's housing crisis. Social homes being sold off and not replaced, insufficient funding for social homes compared to other types of affordable products (including shared ownership and affordable rent – as defined by NPPF), and not

building enough social homes, are identified as the main reasons for the distinct shortage of social homes<sup>2</sup> across England.

- 1.15. As part of their 'let's build social housing' campaign, Shelter have stated that if the government supported the delivery of 90,000 social homes per year across the country, this would lead to significant improvements in the housing crisis and ensure people have a solid foundation to lead happy and healthy lives.
- 1.16. At a Housing Roundtable event<sup>3</sup>, Oldham Council committed to doing our bit to resolve the housing issues being experienced within Oldham, by delivering 500 social homes, with the support of council partners, over the next five years. Further information about the event is set out within section 5 of this document.
- 1.17. In addition to the commitment to deliver social homes, our response to the housing crisis includes a series of other priorities which are aimed at meeting local housing needs, including tackling empty homes through bringing them back into use, and identifying a residential pipeline of future housing sites across the borough and supporting their delivery for a range of housing types.
- 1.18. This Action Plan is framed in the context of Oldham's housing crisis declaration and actions within this Action Plan (contained in part 2) are directly related to meeting Oldham's local housing needs. Further information and progress on the actions are included within part 2 of this Action Plan.

### *Oldham's Housing Strategy*

- 1.19. The Council's Housing Strategy 2019<sup>4</sup> aims to 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.
- 1.20. The Housing Strategy sets out the opportunities that the council, and its partners, have to improve our housing offer and our place offer. These include:
  - Building new homes at a level which increases 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.

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<sup>2</sup> Shelter 'Let's build social housing' campaign:  
[https://england.shelter.org.uk/support\\_us/campaigns/lets\\_build\\_social\\_housing#:~:text=A%20severe%20lack%20of%20social,to%20lead%20happy%2C%20healthy%20lives.](https://england.shelter.org.uk/support_us/campaigns/lets_build_social_housing#:~:text=A%20severe%20lack%20of%20social,to%20lead%20happy%2C%20healthy%20lives.)

1.1. <sup>3</sup> Oldham Council Housing Roundtable Event, February 2024:  
[https://www.oldham.gov.uk/news/article/2618/tackling\\_the\\_housing\\_crisis\\_500\\_new\\_social\\_homes\\_coming\\_to\\_oldham\\_announced\\_at\\_oldham\\_housing\\_roundtable\\_event](https://www.oldham.gov.uk/news/article/2618/tackling_the_housing_crisis_500_new_social_homes_coming_to_oldham_announced_at_oldham_housing_roundtable_event)

<sup>4</sup> Oldham's Housing Strategy, Oldham Council 2019, available at:  
[https://www.oldham.gov.uk/info/200584/housing\\_strategies\\_and\\_research](https://www.oldham.gov.uk/info/200584/housing_strategies_and_research)

1.21. 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 coordination between housing and planning.

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

1.23. As part of the Housing Strategy, a Local Housing Needs Assessment (LHNA) was prepared<sup>5</sup>. This provided an in-depth analysis of Oldham's housing market and housing needs. An update of the LHNA (2024) has been prepared and will be available online in due course. Findings from the updated LHNA are noted throughout this Action Plan where appropriate.

1.24. The council intends to refresh the Housing Strategy in the near future to respond to the housing crisis and to embed the findings of the LHNA update. This will inform future Housing Delivery Action Plans as appropriate.

### *Creating a Better Place (Oldham Council)*

1.25. 'Creating a Better Place'<sup>6</sup> is an ambitious plan for Oldham. Creating a Better Place focuses on building more homes for our residents, creating new jobs through town centre regeneration, and ensuring Oldham is a great place to visit with lots of family-friendly and accessible places to go.

1.26. Creating a Better Place aims to deliver around 2,000 new homes in the town centre designed for a range of different budgets and needs, new job and entrepreneur opportunities, new leisure, retail and cultural facilities and a new park.

### *Oldham Town Centre Development Plan Framework (Oldham Council & Muse)*

1.27. Building on the vision of Creating a Better Place, Oldham Council has partnered with Muse, the place maker, to deliver transformational change for the town centre<sup>7</sup>.

1.28. Informed by Oldham Council's wider regeneration initiatives and planning policy context (both adopted and emerging), the Framework<sup>8</sup> sets out a series of town centre

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<sup>5</sup> Oldham Local Housing Needs Assessment (LHNA) (2019):

[https://www.oldham.gov.uk/downloads/file/5590/housing\\_strategy\\_needs\\_assessment\\_report\\_2019](https://www.oldham.gov.uk/downloads/file/5590/housing_strategy_needs_assessment_report_2019)

<sup>6</sup> 'Creating a Better Place', Oldham Council: [https://www.oldham.gov.uk/info/201248/creating\\_a\\_better\\_place](https://www.oldham.gov.uk/info/201248/creating_a_better_place)

<sup>7</sup> [https://www.oldham.gov.uk/info/201248/creating\\_a\\_better\\_place/3014/2000\\_new\\_homes](https://www.oldham.gov.uk/info/201248/creating_a_better_place/3014/2000_new_homes)

<sup>8</sup> Oldham Town Centre Development Framework: <https://oldhamtownliving.co.uk/wp-content/uploads/2024/11/DP824-Oldham-Development-Framework-NOV-2024-WEB.pdf>

wide development principles together with site specific design principles and illustrative proposals for defined council owned assets across the town centre.

- 1.29. The Development Framework will act as a guide to future development across the town centre and considers infrastructure interventions and technical studies to assist in the delivery of the key sites. The Framework identifies 8 sites across the Town Centre, with indicative capacities and delivery timescales within the SHLAA. The Framework will also inform relevant policies and site allocations within the Local Plan Review.

### *Oldham's Local Plan*

- 1.30. The current Local Plan<sup>9</sup> was adopted in November 2011. The council is in the process of reviewing the Local Plan. A new [Draft Local Plan](#)<sup>10</sup> was consulted upon in 2024 and the feedback will be used to prepare the Publication Plan. Updates on the Local Plan timetable will be made available on the council's website<sup>11</sup> and as part of the Local Development Scheme<sup>12</sup>.

### *'Places for Everyone' Joint Development Plan Document*

- 1.31. Places for Everyone (PfE) is a joint development plan for nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan).
- 1.32. It sets out how the nine districts should develop up until 2039 and:
- Identifies the amount of new development that will come forward across the nine districts, in terms of housing, offices, industry and warehousing, and the main areas in which this will be focused.
  - Supports the delivery of key infrastructure, such as transport and utilities.
  - Protects the important environmental assets across the nine districts.
  - Allocates sites for employment and housing outside of the existing urban area; and
  - Defines a new green belt boundary for the nine districts.
- 1.33. Places for Everyone was adopted by all nine districts on 21 March 2024, becoming part of Oldham's statutory development plan from this date<sup>13</sup>.
- 1.34. PfE sets out the housing requirement for each of the nine districts and also identifies the housing land supply, the distribution of housing land, the phasing of new housing development, and includes policies on affordability, type, size and design of new housing and housing density.

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<sup>9</sup> Oldham's Local Plan – The Joint Core Strategy and DPD (adopted 2011), available at: [https://www.oldham.gov.uk/homepage/913/adopted\\_plans\\_and\\_guidance](https://www.oldham.gov.uk/homepage/913/adopted_plans_and_guidance)

<sup>10</sup> Oldham Draft Local Plan, available at: [https://www.oldham.gov.uk/info/201233/local\\_plan\\_review/3095/draft\\_local\\_plan](https://www.oldham.gov.uk/info/201233/local_plan_review/3095/draft_local_plan)

<sup>11</sup> [https://www.oldham.gov.uk/info/201233/local\\_plan\\_review](https://www.oldham.gov.uk/info/201233/local_plan_review)

<sup>12</sup> Local Development Scheme (2023): [https://www.oldham.gov.uk/info/201231/emerging\\_planning\\_policy/230/local\\_development\\_scheme\\_timetable](https://www.oldham.gov.uk/info/201231/emerging_planning_policy/230/local_development_scheme_timetable)

<sup>13</sup> Places for Everyone: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/>

### **Approach**

1.35. The remainder of the Action Plan includes the following:

- Housing need, delivery and supply analysis (contained in Part 1);
- A summary of findings and key issues related to housing delivery (contained in Part 1);
- Key actions and responses for improving housing delivery (contained in Part 2); and
- Project management and monitoring arrangements (contained in Part



## 2 Housing Needs

- 2.1. This section provides an analysis of housing need issues, including affordable housing and housing for the elderly, in the borough.

### A National Picture

- 2.2. There is a need to deliver housing to meet specific housing needs, such as homes for older people, affordable homes and homes for families.
- 2.3. There are several significant issues affecting housing demand and provision at a national level which offer perspective to some of the acute housing issues being experienced in Oldham.
- 2.4. England has an ageing population. The proportion of people aged 65 years and over rose from 16.4% in 2011 to 18.6% in 2021<sup>14</sup>. Whilst people are living longer, the number of years people can expect to live in good health (without a disabling illness) is declining<sup>15</sup>. There are also inequalities in healthy life expectancy based on deprivation. With those living in more deprived areas also living shorter lives, this means that they spend a smaller proportion of their lives in good health, compared to people living in less deprived areas.
- 2.5. There is a national under-supply of housing. According to research there is a need for around 370,000 new homes per year in England, of which 145,000 should be affordable (up to 2031). The government has committed to reaching a supply of 370,000 homes per year.<sup>16</sup> However, during 2023/24 around 221,070 new homes were supplied (similar to 2022/23). Housebuilding is not occurring at the rate required to meet housing needs.
- 2.6. Housing affordability is worsening. House prices have become less affordable over time with long term house price growth contributing to reduced affordability.
- 2.7. The latest published ONS figures (March 2023) show that in 2022, full-time employees in England could expect to spend around 8.3 times their annual earnings buying a home<sup>17</sup>. Another recent report<sup>18</sup> found this to be even higher, in that the average house in the UK currently costs 9.1 times average annual earnings. In terms of the north-west, house prices are around 7.5 times the average annual earnings.
- 2.8. Interest rates have also been increasing since the start of 2022, meaning the cost of mortgage repayments is increasing, further impacting affordability. However, the rate began to fall in July 2024 and is steadily decreasing.

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<sup>14</sup> ONS Census 2021:

<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/ageing/articles/profileoftheolderpopulationlivinginenglandandwalesin2021andchancesince2011/2023-04-03#:~:text=2.-,Population%20ageing,from%2016.4%25%20to%2018.6%25>

<sup>15</sup> The State of Ageing (2022), available at: <https://ageing-better.org.uk/sites/default/files/2022-04/The-State-of-Ageing-2022-online.pdf>

<sup>16</sup> Planning overhaul to reach 1.5million: [Planning overhaul to reach 1.5 million new homes - GOV.UK](https://www.gov.uk/government/news/planning-overhaul-to-reach-1-5-million-new-homes)

<sup>17</sup> ONS Housing Affordability (2023 release):

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2022>

<sup>18</sup> 'What 175 years of data tell us about house price affordability in the UK', Schroders 2023:

<https://www.schroders.com/en/global/individual/insights/what-174-years-of-data-tell-us-about-house-price-affordability-in-the-uk/>

- 2.9. The cost of renting is also increasing - between January 2024 and January 2025 private rental prices paid by tenants increased by 8.7% across the UK. Around 40% of adults reported finding it very, or somewhat, difficult to afford their rent or mortgage payments in the latest pooled period (2023)<sup>19</sup>.
- 2.10. ONS research has found that when asked what the most important issues facing the UK are, adults cited 'cost of living' most often and 'housing' fifth. 16% of adults reported that increased rent or mortgage costs has contributed to their overall increased cost of living (amongst the price of food shopping, gas and electricity and the price of fuel)<sup>20</sup>.
- 2.11. In terms of financial resilience (measured as being able to withstand a 25% fall in household employment income over a three-month period), over one quarter (27%) of households could not cover this. Households which were most likely to report this, and therefore considered the least financially resilient, were lone parents with dependent children (55%), renters (48%), households with a Black, African, Caribbean, or Black British head (53%), households where the head had a routine or semi-routine occupation (46%) and households where the head had a limiting disability or longstanding illness (34%)<sup>21</sup>.

## Oldham Context

### **Demographic**

- 2.12. In terms of demographics, Oldham's population was estimated to be 246,130<sup>22</sup> in 2023.
- 2.13. According to the Councils Service projections, Oldham's population is projected to reach 258,929 by 2033 – a 5% increase from the 2023 population<sup>23</sup>. High birth rates within the Pakistani and Bangladeshi communities, along with internal and international migration, will be major influences in Oldham's population growth.

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<sup>19</sup> ONS Opinions and Lifestyle Survey – Impact of increased cost of living on adults across Great Britain: July to October 2023:

<https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/articles/impactofincreasedcostoflivingonadultsacrossgreatbritain/latest#characteristics-associated-with-financial-vulnerability>

<sup>20</sup> ONS Opinions and Lifestyle Survey – Impact of increased cost of living on adults across Great Britain: July to October 2023:

<https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/articles/impactofincreasedcostoflivingonadultsacrossgreatbritain/latest#characteristics-associated-with-financial-vulnerability>

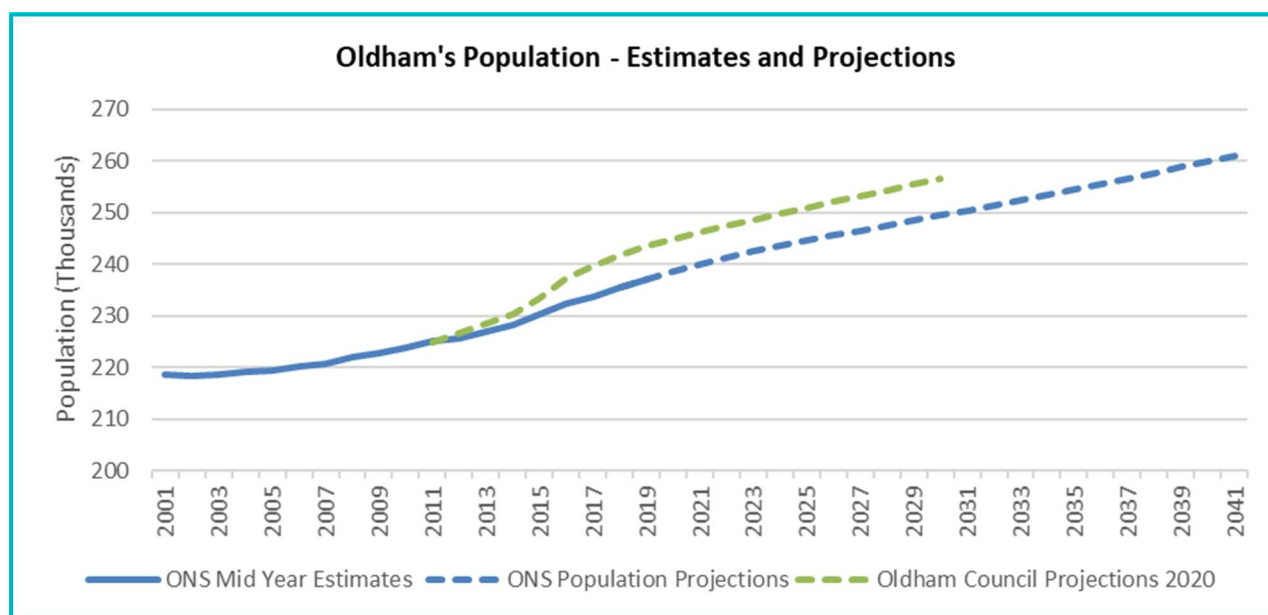
<sup>21</sup> ONS Opinions and Lifestyle Survey – Impact of increased cost of living on adults across Great Britain: July to October 2023:

<https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/articles/impactofincreasedcostoflivingonadultsacrossgreatbritain/latest#characteristics-associated-with-financial-vulnerability>

<sup>22</sup> ONS Mid Year Estimates 2023: <https://www.ons.gov.uk/visualisations/censuspopulationchange/E08000004/>

<sup>23</sup> Joint Strategic Needs Assessment: <https://www.jsnaoldham.co.uk/profile/>

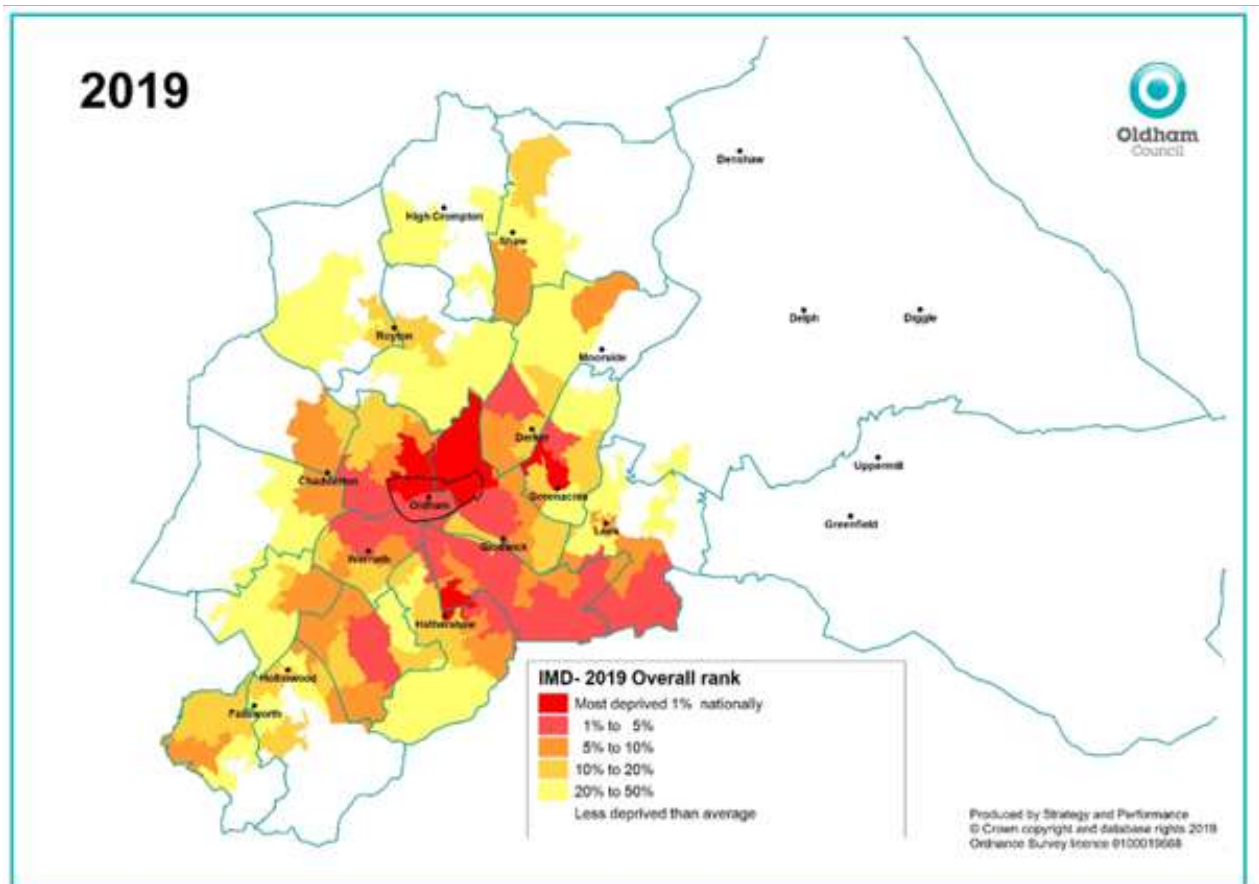
Figure 1: Oldham's Population Projections 2001 to 2041<sup>24</sup>



- 2.14. It is expected that the number of older people in Oldham will grow by 30% in the next 20 years. This will bring major challenges for adult social care, specialist housing and health provision.
- 2.15. Also, changes in Oldham's ethnic composition are likely to affect patterns of residence within Oldham. There may be an increased need to support community relations, particularly within neighbourhoods where ethnic compositions are shifting rapidly.
- 2.16. Levels of deprivation across the borough are generally ranked amongst the highest in the country. Oldham currently has four areas within the borough which are among the top 1% of the nation's most deprived areas in the wards of St Mary's, Coldhurst and Alexandra. Only the wards of Crompton, Saddleworth North and Saddleworth South do not contain any areas that fall within the nation's top 20% most deprived.

<sup>24</sup> Source: Oldham in Profile 2024, Oldham Council - ONS Mid-Year Estimates, ONS SNPP 2020, Oldham Council Projections 2020

Figure 2: Oldham Areas of High Deprivation, 2019<sup>25</sup>



- 2.17. In terms of income, Oldham has traditionally had low wage levels. This is likely due to the industry mix within the borough and the relative skill levels of the local workforce. Average incomes within Oldham are amongst some of the lowest in Greater Manchester<sup>26</sup>.
- 2.18. Life expectancy in Oldham is two years shorter than life expectancy across England and Oldham's residents have worse health than England's average. High levels of deprivation in the borough have a significant impact on health outcomes. There are also significant social inequalities within Oldham - 40% of people living in Coldhurst belong to an income-deprived household, whilst this is only around 5% in Saddleworth South. These social inequalities inevitably lead to health inequalities - the difference in life expectancy between the most and the least deprived ward in Oldham is over 12 years<sup>27</sup>.
- 2.19. In addition, the number of years and proportion of life Oldham residents are spending in poor health is increasing. This will impact on demands for services provided by the council, such as healthcare and Adult Social Care.

<sup>25</sup> Source: Oldham in Profile 2024, Oldham Council - Department for Levelling up, Housing and Communities (2021-Present), Ministry of Housing, Communities and Local Government (2018-2021), Department for Communities and Local Government (2006-2018), English indices of deprivation

<sup>26</sup> Oldham in Profile 2024, Oldham Council – ONS Annual Survey of Hours and Earnings 2022.

<sup>27</sup> Oldham in Profile 2024, Oldham Council

- 2.20. Oldham is estimated to have 93,152 households (as of 2021)<sup>28</sup>. The borough has an unbalanced housing market with low proportions of detached properties and a very high proportion of terraced homes – the highest in Greater Manchester.
- 2.21. Oldham has a need for larger family accommodation highlighted by the issues around over-crowding, particularly in South Asian communities, and this demand is expected to intensify over time. The 2021 Census identified that 7.5% of households in Oldham are overcrowded compared to 4.4% nationally. Large concentrations of overcrowded homes are located around the outskirts of the town centre, particularly in the wards of Coldhurst, St Mary's and Werneth<sup>29</sup>.
- 2.22. Approximately 70.1% of occupied homes are owner-occupied; 21% are rented from a social housing provider; 7.3% are private rented and 0.6% are intermediate tenure dwellings (i.e. shared ownership)<sup>30</sup>.
- 2.23. Housing tenure distribution varies considerably across the borough, with high concentrations of social housing in the more deprived communities and lower levels of affordable housing in more rural areas.
- 2.24. The private rented sector has expanded very quickly across Oldham as well as nationally due to rising house prices in relation to earnings and a dramatic fall in the number of homes being rented out by local authorities.
- 2.25. Oldham's LHNA outlined the median house price in Oldham as of March 2023 was £180,000 – less than the Greater Manchester average (£219,000) and significantly lower than the England average (£290,000). House prices in Oldham are some of the lowest in Greater Manchester, likely impacted by the large proportion of terraced properties which make up Oldham's housing stock.
- 2.26. House prices, available housing stock and affordability (the ratio of earnings to house prices) vary significantly across Oldham. The median price paid in Saddleworth North, Oldham's most prosperous ward, was £298,750, in contrast to St Mary's – one of Oldham most deprived wards at £115,000. Over the last decade, the median house price paid in Oldham has increased by 66.7% from £108,000 in March 2013 to £180,000 in March 2023, compared with 75.2% in Greater Manchester and 56.8% nationally<sup>31</sup>.
- 2.27. The average house price in Oldham was £197,000 in December 2024, a 6.6% increase from December 2023. This was higher than the rise in the North West (5.4%) over the same period. In the year December 2024, the average price for terraced properties in Oldham rose by 7.3%, while the average price for flats increased by 4.4%<sup>32</sup>.
- 2.28. While house prices remain low compared to Greater Manchester, regional and national levels, they are still unaffordable for many Oldham residents due to low wages and high deposit requirements. In 2023, Oldham's affordability ratio was

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<sup>28</sup> ONS 2021 Census

<sup>29</sup> Oldham in Profile 2024, Oldham Council.

<sup>30</sup> Oldham Local Housing Needs Assessment Update 2023/24

<sup>31</sup> Oldham in Profile 2024, Oldham Council – Land Registry data.

<sup>32</sup> Housing Prices in Oldham ONS:

[https://www.ons.gov.uk/visualisations/housingpriceslocal/E08000004/#house\\_price](https://www.ons.gov.uk/visualisations/housingpriceslocal/E08000004/#house_price)

6.03, compared to 6.26 in 2022, 6.26 in 2021 and 5.1 in 2020<sup>33</sup>. Meaning on average the price of a home in Oldham is now 6.03 times the average annual earnings. Oldham's affordability has been (on average) continually worsening since 2000, although it has improved slightly compared to 2022 and 2021.

2.29. In terms of renting, Oldham is amongst some of the 'most affordable' boroughs in Greater Manchester to rent a home, with the rental affordability ratio estimated at 31.08% (i.e. average rent costs are 31.08% of average monthly pay). However, the boroughs of Bury, Bolton, Rochdale and Wigan are all more affordable to rent in compared to Oldham<sup>34</sup>. A large proportion of the affordable provision in Oldham is focussed on smaller property types (2-3 beds). The local demand for larger properties (4-5+ beds) is very high.

2.30. Also, rising energy prices and energy-inefficient housing means 15.4% of households in Oldham are in fuel poverty. This rate is higher than Greater Manchester (14.1%) and England (13.1%)<sup>35</sup>. Living in a cold home can have serious health implications, particularly for the old, very young and for people with disabilities and can even play a role in premature deaths. Fuel poverty is closely associated with low income and is most common among those who live in privately rented accommodation.

2.31. The following section sets out housing needs for particular groups.

#### *Affordable Housing Need*

2.32. The LHNA Update (2024) has found that there is a considerable shortfall of affordable housing in the borough, with an annual need for 669 affordable homes a year (over the next 10 years). This is almost as high as our average housing requirement over the PfE plan period – 680 homes a year. Whilst it will be difficult to meet this target, it highlights the importance of the council having a robust affordable housing policy in place to help deliver against this affordable housing need and ensure that we deliver as much as we are able to.

2.33. There is a need for a range of affordable housing types – 37% should be 1 or 2 bedrooms, 43% should be 3-bedrooms and 21% should be 4-bedrooms.

2.34. We also need an appropriate tenure mix – development of affordable housing needs to focus on social or affordable rented properties with some affordable home ownership properties. A tenure split of 50% social or affordable rented and 50% affordable home ownership may be appropriate in terms of planning policy requirements.

2.35. At present, Oldham is experiencing increasing demand for social housing which is outstripping supply.

2.36. Currently (February 2024) there is a need for 7,954 households on the Council's Housing Needs Register, but only 816 homes available (on average 68 homes

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<sup>33</sup> ONS 'House price to workplace-based earnings ratio', March 2024: [House price to workplace-based earnings ratio - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/economy/propertyandhousing/houseprices/articles/housepricetoworkplacebasedearningsratio)

<sup>34</sup> Property Insider (ONS data 2023): <https://propertyinsider.info/the-best-and-worst-areas-to-rent-a-home-in-greater-manchester/#:~:text=The%20rent%20affordability%20ratio%20of,their%20monthly%20salaries%20on%20rent.>

<sup>35</sup> DESNZ Sub regional fuel poverty 2023 - <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-2023-2021-data>



become available per month). The largest demand (and available supply) is for 1-bed, 2-bed and 3-bed housing.

- 2.37. There is also a demand for 4-bed to 7-bed homes, but there is very limited supply of larger homes. In fact, there is currently no available supply of 5+ bed housing to meet the needs of 282 applicants.
- 2.38. There are increasing numbers of people in temporary accommodation – between June 2020 and January 2025 the number of people in temporary accommodation increased by over 300% (219 households in June 2020 to 663 households in January 2025).

#### *Specialist Housing Need*

- 2.39. The LHNA Update (2024) has also looked at the need for specialist housing, including housing for older people and disabled people.
- 2.40. It has found that there is a need for 4,869 additional units of accommodation for older people by 2041, including 775 residential care bedspaces, 955 Extra Care units and 3,139 other types of accommodation, including leasehold sheltered. The LHNA update recommends strengthening policies to enable people to live in their own homes for longer with appropriate support and adaptation.
- 2.41. It sets out that all new homes should be accessible and adaptable (M4(2) Standard)<sup>36</sup>, which would include bungalows and level access accommodation, in line with policy JP-H3 of Places for Everyone. Also, that 5 % of all new homes should be wheelchair accessible (M4(3) Standard)<sup>37</sup>.
- 2.42. Further analysis of housing needs is available within the LHNA update, which will inform future Housing Delivery Action Plans as appropriate.

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<sup>36</sup> M4(2) Accessible and adaptable dwellings (pages 10-23):  
[https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR\\_PDF\\_AD\\_M1\\_2015\\_with\\_2016\\_amendments\\_V3.pdf](https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf)

<sup>37</sup> M4(3) Wheelchair user dwellings (pages 23-50):  
[https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR\\_PDF\\_AD\\_M1\\_2015\\_with\\_2016\\_amendments\\_V3.pdf](https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf)

### 3 Housing Delivery

3.1. This section provides an analysis of housing delivery against our housing needs and identifies unmet need and deficiencies.

#### Housing Requirement

3.2. The HDT looks at the number of homes delivered compared to the number of homes required over the previous three complete years, from the date of publication. The most recent measurement therefore looks at the period of 2020/21, 2021/22 and 2022/23.

3.3. Oldham's housing delivery is tested against our local housing need figures for each year over that time, as shown in table 2 below. For the years 2020/21 and 2021/22 local housing need is calculated using the government's 'standard methodology' for calculating local housing need. For 2022/23, the housing requirement for Oldham (as relevant to that year) set out in Places for Everyone is used<sup>38</sup>.

3.4. Oldham's Housing Delivery Test results for the 2023 measurement are set out in table 2.

Table 2: Oldham's Housing Delivery Test Results (2023 measurement)

Year	Number of Homes Required	Number of Homes Delivered	
2020/21	461	500	
2021/22	677	506	
2022/23	404	400	
<b>Total (2020-2023)/ Average Delivery Rate %</b>	1,542	1,406	91%

3.5. As shown in table 2, housing delivery has been variable over the previous three years, however overall Oldham has delivered 91% of the housing required. This is the same as the 2021 and 2022 HDT measurement result.

3.6. Since the introduction of the Housing Delivery Test in 2018, Oldham's housing delivery has improved. The results for this year compared to previous years are set out in table 3 below.

Table 3: Oldham's Housing Delivery Test Results (2018-2023)

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<sup>38</sup> NPPF and the HDT rulebook requires that where a local authorities Local Plan is more than five years old, local housing need should be calculated using the governments 'standard methodology'. Oldham's current Local Plan – The Joint Core Strategy and Development Management Policies DPD – was adopted in 2011. During the years of 2020/21 and 2021/22, which are considered by the 2023 HDT measurement, Oldham's Local Plan was more than five years old. As such, the 'standard methodology' applied for calculating local housing need for this period. However, as Places for Everyone was adopted on 21 March 2024, and sets out Oldham's housing requirement, the HDT measurements uses the Places for Everyone housing requirement for Oldham (404 homes a year for 2022/23) for the calculating housing delivery for the year 2022/23.



<b>HDT Measurement Year<sup>39</sup></b>	<b>Delivery Rate % (HDT Result)</b>
2018	64%
2019	65%
2020	80%
2021	91%
2022	91%
2023	91%

- 3.7. As shown in table 3, on average the housing delivery rate has increased by 27% since the measurement was introduced in 2018.
- 3.8. Where a new housing requirement is adopted through a Local Plan, the HDT calculation will be calculated using these new targets and any consequences for under-delivery will be applied.
- 3.9. As of 21 March 2024, Places for Everyone (PfE) now sets out Oldham's housing requirement for the plan period. PfE identifies a stepped housing requirement for Oldham of 404 homes per year for 2022-2025, 680 homes per year for 2025-2030, and 772 homes per year for 2030-2039. This equates to an annual average of 680 new homes per year.
- 3.10. Looking forward, based on the current methodology the 2024 HDT measurement, which is expected to be published in 2025, would look back at years 2021/22, 2022/23 and 2023/24 to identify the number of new homes required and delivered. The housing requirement of 404 homes per year would apply for 2022/23 and 2023/24 given that the plan period is 2022-2039. On this basis, and if delivery rates continue as they are or increase, performance would improve against the HDT 95% pass rate. However, the stepped housing requirement set out in Places for Everyone does mean that from 2025/26 this would increase to 680 homes a year.
- 3.11. Based on the identified housing land supply, as set out in the recently published Strategic Housing Land Availability Assessment (SHLAA) (2024), against the PfE stepped requirement, the housing land supply would be sufficient to meet the requirement for the first five years and the remainder of the plan period. However, whilst the SHLAA identifies land that may be suitable for housing, it does not in itself guarantee that planning permission will be granted or ensure that this housing is delivered. As such, supporting the delivery of housing to meet Oldham's housing needs will be critical going forward, and we will need to consider how through the Action Plan this is addressed.

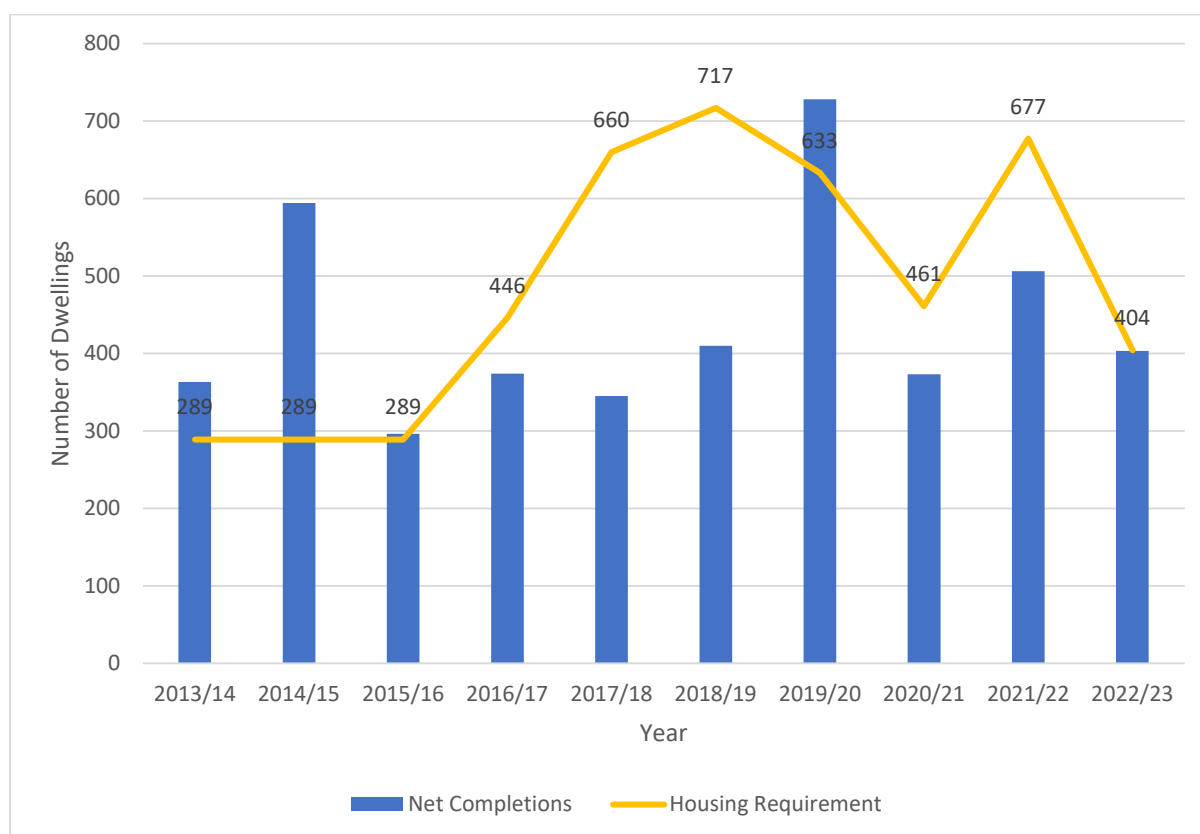
### *Housing Completions*

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<sup>39</sup> Measuring housing delivery compared to housing required over the previous three years. I.e. the 2018 measurement looks at housing delivery over the years 2015-2018.

- 3.12. Over the last ten years (2013/14 – 2022/23), prior to and including the most recent HDT measurement year (2022/23), 4,392 (net) new homes have been completed. This represents an average of 439 homes per year.
- 3.13. The number of net completions has fluctuated over the last ten years. After falling in 2015/16, completions increased again from 2016/17 as several larger sites began construction. Prior to this there were high levels of clearance due to regeneration activity during 2003/4 to 2012/13 together with changing economic conditions witnessed since 2008/09 that may have had an effect.
- 3.14. Completions for 2020/21 (373 homes) were significantly lower than the previous year 2019/20 (728 homes). It is likely that the impact of the Covid-19 pandemic and wider socio-economic issues may have contributed to the lower level of completions.
- 3.15. Whilst it is not included within the most recently published HDT measurement (2023), 420 homes were completed in 2023/24.
- 3.16. In 2024/2025 the Council committed to delivering 500 social homes in the next 5 years. The pipeline projects that in the next 5 years, 729 social homes will be delivered on Council, Partner and Private sites. In addition to this, the Council committed to deliver 1000 TANZ homes over the next 5 years to meet the regional target of 10,000 homes.
- 3.17. Progress is being made in delivering social homes on Council sites. The current requirement is to provide 40% affordable properties, including social homes. On all sites under construction, it is estimated that 175 social homes are being delivered.
- 3.18. In 2024/25 578 homes were completed on Council owned, Delivered with Partners and Privately owned sites.

**Figure 3: Housing Completions 2013/14 to 2022/23**



3.16. Over the period, 473 homes less than the required number of homes (4,865) have been delivered. As shown in figure 3, the number of completions has only exceeded the housing requirement five times in the ten-year period.

3.17. In terms of affordable housing specifically, table 4 shows that over the ten-year period (2013/14 to 2022/23) there have been 1,337 new build affordable homes delivered. On average over this period affordable homes represent just under a third (30%) of all homes delivered. It should be noted that this is defined as per the definition of 'affordable housing' in NPPF<sup>40</sup> and can include several tenures.

**Table 4: Affordable Housing Completions 2013/14 to 2022/23 (new-build)**

Year	Total number of homes delivered	Number of affordable homes delivered	% of total homes delivered that were affordable tenure
2013/14	363	202	56%
2014/15	594	280	47%
2015/16	296	20	7%

<sup>40</sup> NPPF Annex 2: Glossary – 'Affordable housing': Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions. Including social rent, other affordable housing for rent, discounted market sales housing and other affordable routes to home ownership.

2016/17	374	60	16%
2017/18	345	42	12%
2018/19	410	90	22%
2019/20	728	176	24%
2020/21	373	129	35%
2021/22	506	173	34%
2022/23	403	165	41%
<b>Total</b>	<b>4,392</b>	<b>1,337</b>	<b>30%</b>

3.18. In addition, 121 (new build) affordable homes have been delivered in 2023/24 which represented 29% of all homes completed that year.

3.19. Affordable housing completions were lower for 2015/16 to 2018/19, following higher levels of affordable home development in years prior to 2015/16 because of Housing Market Renewal programmes, which have now completed.

3.20. Section 4 addresses the future supply of housing, including affordable housing.

### *Implementation of Planning Permissions*

3.21. Figure 4 shows the rate of delivery compared to the number of homes granted planning permission each year over a ten-year period (2013/14 to 2022/23) against the requirement set out in the Local Plan and, more recently, the HDT requirement and Places for Everyone.

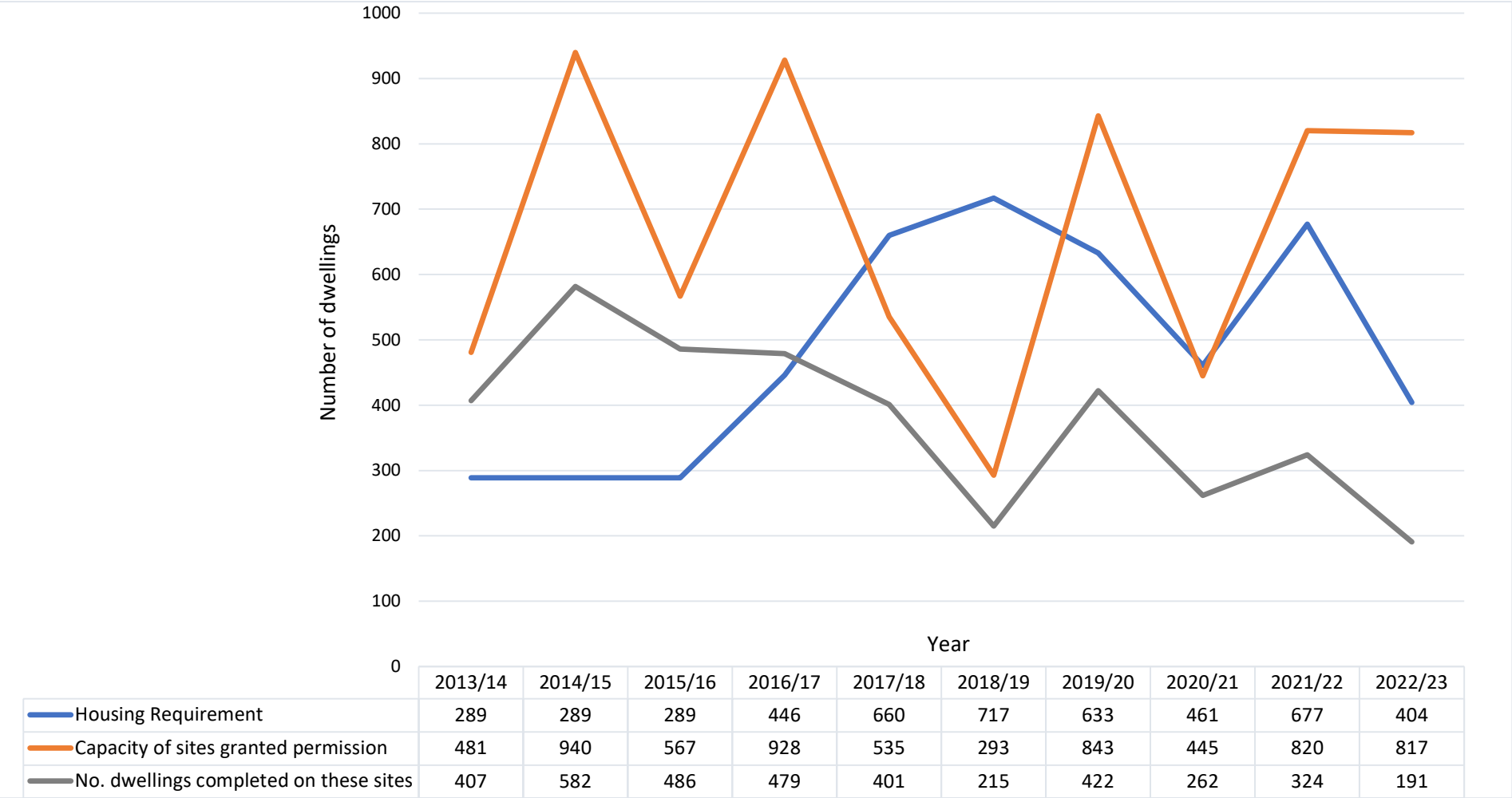
3.22. This has fluctuated over time and shows that:

- the number of new homes granted permission has far exceeded the adopted Local Plan housing requirement of 289 dwellings per year;
- during 2017/18 and 2018/19 the number of new homes granted permission was far less than the requirement for those years; and
- during 2019/20, 2021/22 and most recently, 2022/23, the number of new homes granted permission far exceeded the requirement for that year, whilst during 2020/21 it was only 16 homes less.

3.23. Over the period, approximately 782 sites have been granted planning permission, generating a potential yield of 6,669 homes. Just over half (3,769 homes or 57%) have been completed, although it must be borne in mind that 166 sites (or 1,637 homes) are still within the extant planning permission period – 3 years from date of permission – at the time of monitoring as relevant to this Action Plan. As such, there is potentially still time for these to come forward.

3.24. Further analysis of the sites that have been granted permission for housing in the last ten years and the progress of these sites, shows that over this period an average of 11% have lapsed, meaning an equivalent of 603 homes cannot come forward unless a fresh application is submitted and granted. On average, every year since 2013/14 75 homes granted planning permission are not commenced.

Figure 4: Residential permissions compared to completions 2013/14 to 2022/23



### *Size of sites coming forward*

- 3.25. Analysis of 'minor' and 'major' residential development sites<sup>41</sup>, shows that minor sites (of between 1 and 9 dwellings) make up 85% of the sites granted planning permission in the last ten years. Major sites (of more than 10 dwellings) make up 15%. Figure 5 illustrates this.
- 3.26. Despite the above, figure 6 shows that 75% of the total number of homes granted planning permission over the last ten years are on major sites. Therefore, whilst the number of major sites is relatively low, they form a significant proportion of our supply in terms of the number of new homes.
- 3.27. More detailed analysis shows that only 7% of dwellings granted permission on major sites have not been built and the planning permission has since expired, which is a lower lapse rate than the overall supply (11%). This includes two sites of over 50 dwellings, with a capacity for 251 new homes, where planning permission has expired without implementation.

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<sup>41</sup> For housing, major development is defined as that of 10 or more homes or a site area of 0.5 hectares or more. Minor residential development is that which falls below these thresholds (NPPF, Annex 2 – Glossary).

Figure 5: Number of sites with planning permission for residential uses by site size 2013/14 to 2022/23

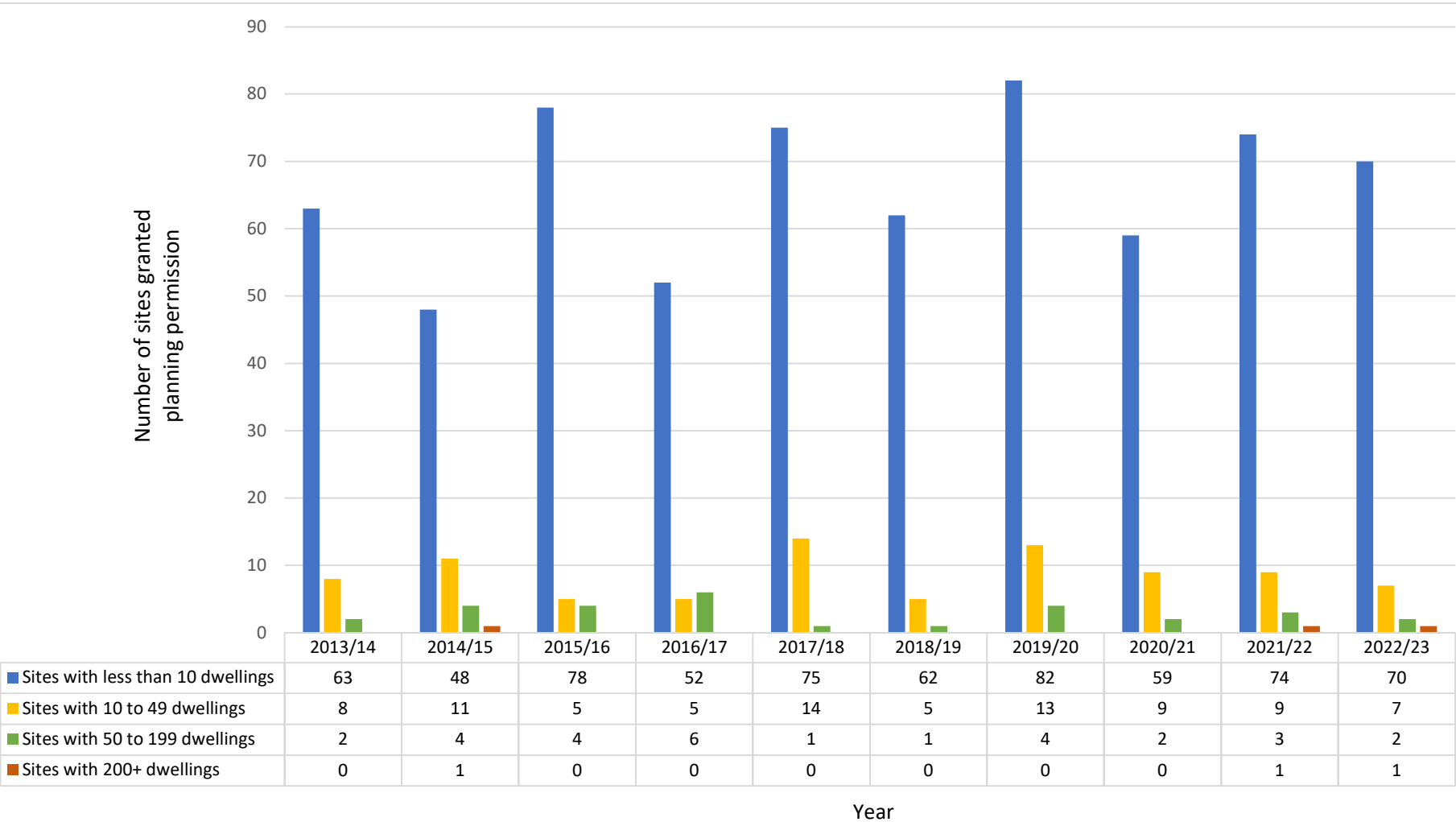
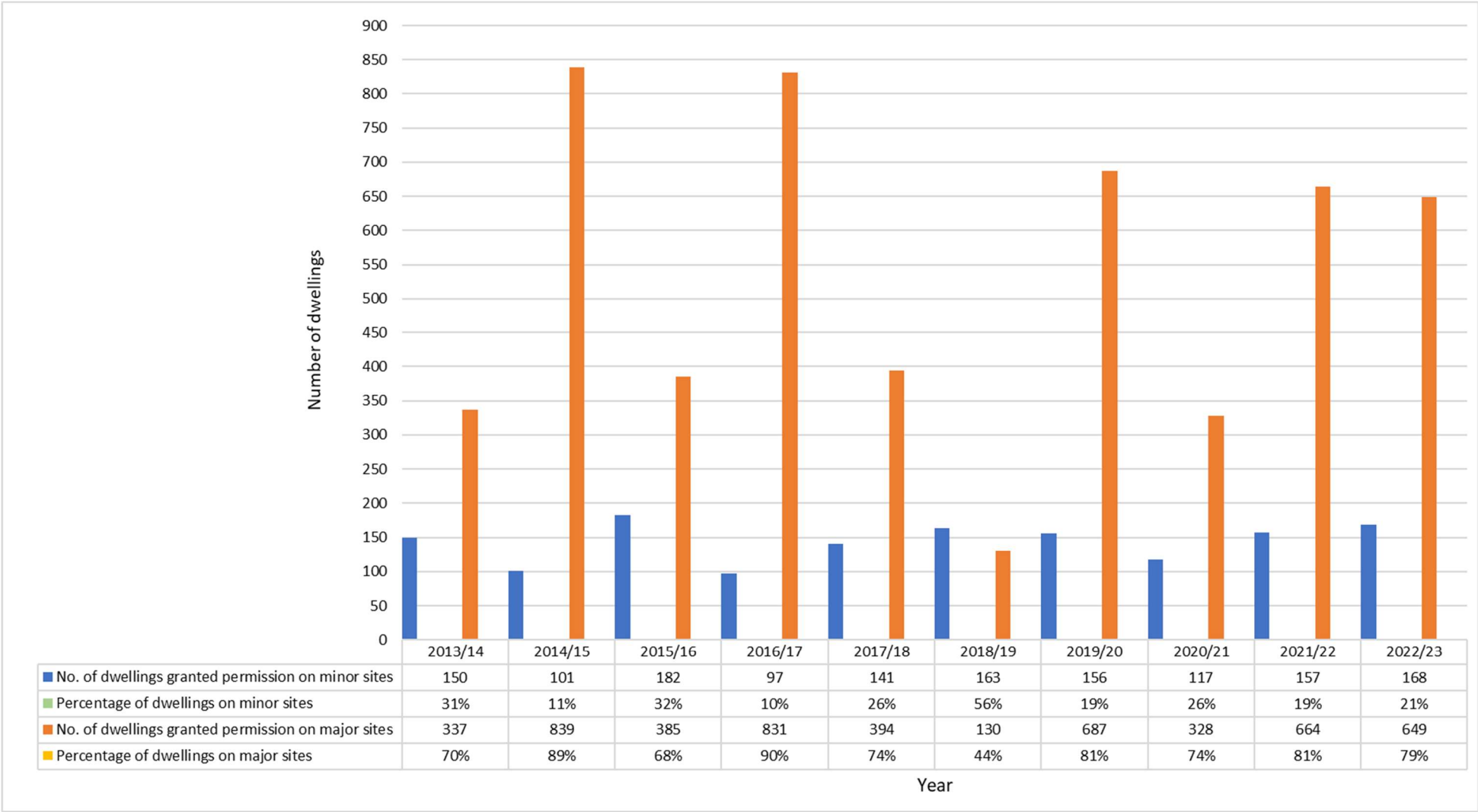




Figure 6: Number of dwellings with planning permission by site size 2013/14 to 2022/23



### *Build-out Rates*

- 3.28. Analysis shows that on average larger schemes tend to be commenced faster than the smaller schemes as shown in table 5 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.
- 3.29. The build-out rates also show that larger sites tend to spend more time under construction, compared to smaller sites, however they deliver the greatest number of dwellings per year. This is likely due to phasing, build-out capacity and the need for supporting infrastructure to be constructed (such as roads).
- 3.30. Table 5 shows that all schemes which commence are built out within 4 years, and medium sites of 20-49 dwellings tend to be built out the quickest (within 1.6 years).
- 3.31. Table 5 indicates that if a scheme does commence, it tends to get built relatively quickly. However, the analysis shows that there is an issue with planning permission being implemented with a 11% overall lapse rate. In terms of the scale of development coming forward, only three large-scale major schemes (200+ homes) at Foxdenton (2014/15), Cowlshaw (2021/22) and Land at Rosary Road/ Hill Farm Close, Fitton Hill (2022/23) have received planning permission in recent years.
- 3.32. This may be due to the lack of large-scale allocations/ sites at the delivery stage and land availability. However, it is expected that the development of large-scale sites will improve in the next 5-10 years, with key development sites within Oldham Town Centre and several of the (remaining) PfE Strategic Allocations expected to begin to come forward. At the time of writing, planning applications have been submitted for several key sites within the town centre, including:
- Former Magistrates Court, King Street, Oldham – OUT/354323/25;
  - Manchester Chambers, West Street, Oldham, OL1 1LF – OUT/354325/25;
  - Former Civic Centre & Queen Elizabeth Hall, West Street, Oldham, OL1 1UT – OUT/354338/25;
  - Land At Prince's Gate, Prince Street, Oldham, OL1 3TL – OUT/354326/25; and
  - Former Leisure Centre, Rock Street, Oldham – OUT/354324/25.
- 3.33. With regards to minor sites, the build-out rates indicate that where they are for individual houses there may not be the impetus or the ability to deliver the dwelling quickly, owing to constraints such as cost or availability of construction materials and labour.

Table 5: Lead-in times and build-out rates

Size 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+	3-27	11	56	47	49
50-99	1-35	9	44	30	44
20-49	1-39	11	30	19	32
10-19	1-44	13	31	20	12
6-9	1-44	16	36	21	8
0-5	1-56	14	30	20	2

## 4 Housing Land Supply Analysis

### *Housing Land Supply*

- 4.1. Analysis within this section is based on the housing land supply as of 1 April 2024 as identified in the council's SHLAA<sup>42</sup> and Monitoring Report<sup>43</sup>.
- 4.2. The SHLAA (as of 1 April 2024) identifies a baseline housing land supply of 12,910 homes. This increases to 13,475 homes when including small sites and clearance allowances. A breakdown of the housing land supply as of 1 April 2024 is shown in table 6.
- 4.3. Table 6 shows that 23% of the supply is on sites within the planning system. This includes those that are under construction and those which have extant planning permission (outline and full). A further 8% is on sites which have been considered within the planning system, including existing Saved UDP Housing Allocations and sites which have previously had planning permission but where the permission has since lapsed, or the site has stalled. Approximately 49% of the housing land supply is on potential sites (no planning history) and those which are pending a decision on a planning application for residential development.
- 4.4. The housing land supply for 2024 includes the PfE Strategic Allocations for residential (or mixed-use) development. This category includes 2,478 homes, which equates to 19% of the total housing land supply.
- 4.5. Two sites within PfE Allocation JPA14 Cowlshaw, are included within the housing land supply relative to their respective planning status as they have received planning permission in previous supply years (prior to adoption of PfE) and are under construction:
  - HLA3862 Cowlshaw Abbatoir, Shaw which received planning permission (RES/346720/21) in January 2022 for 201 dwellings; and
  - HLA3966 Land to the south of Denbigh Drive, Shaw which and received planning permission (FUL/346529/21) in May 2022 for 42 dwellings.
- 4.6. The remaining allocations (and the remaining undeveloped parcel at the Cowlshaw allocation) are included within their own category 'PfE Strategic Allocations' within the housing land supply. JPA11 Bottomfield Farm (Woodhouses) has recently gained planning permission for 27 dwellings (FUL/347760/21). This site had not started at the time of writing but is expected to start soon.

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<sup>42</sup> Strategic Housing Land Availability Assessment (SHLAA) (as at 1 April 2024), available at: [https://www.oldham.gov.uk/info/201230/monitoring/2134/strategic\\_housing\\_land\\_availability\\_assessment\\_shlaa](https://www.oldham.gov.uk/info/201230/monitoring/2134/strategic_housing_land_availability_assessment_shlaa)

<sup>43</sup> Oldham's Monitoring Report and Infrastructure Funding Statements 2023 to 2024, available at: [https://www.oldham.gov.uk/info/201230/monitoring/263/oldhams\\_monitoring\\_report](https://www.oldham.gov.uk/info/201230/monitoring/263/oldhams_monitoring_report)

Table 6: Breakdown of the housing land supply as at 1 April 2024

SHLAA category	Total dwellings 2024-2029	Total dwellings 2029-2034	Total dwellings Years 11+	Total dwellings - all periods	% of supply (dwellings)	Total of number of sites	% of supply (sites)
Sites under construction	1,877	104	0	1981	15%	147	33%
Sites with extant planning permission	778	168	0	946	7%	151	34%
Saved UDP Phase 1 housing allocations	64	311	0	375	3%	8	2%
Saved UDP Phase 2 housing allocations	3	184	0	187	1%	5	1%
Lapsed and Stalled sites	51	427	109	587	5%	34	8%
Potential & pending sites	720	2,054	3,582	6356	49%	96	21%
PfE Strategic Allocations	27	1,463	988	2,478	19%	7	2%
<b><i>SUBTOTAL</i></b>	<b><i>3,520</i></b>	<b><i>4,711</i></b>	<b><i>4,679</i></b>	<b><i>12,910</i></b>	<b><i>100%</i></b>	<b><i>448</i></b>	<b><i>100%</i></b>
Current small sites allowance minus any small sites already identified in supply	0	320	320	640			
Current clearance allowance	25	25	25	75			
<b>TOTAL</b>	<b>3,495</b>	<b>5,006</b>	<b>4,974</b>	<b>13,475</b>			

### *Current Position of Housing Allocations*

- 4.7. 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 commencing preparation of the Greater Manchester Spatial Framework (now Places for Everyone).
- 4.8. 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.
- 4.9. Analysis of the phase 1 housing allocations indicates that 57%, or 12, of the 21 allocations have been completed. There are nine 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). Part of the allocation at Oldham Road/ Hardman Street has extant planning permission for residential development (FUL/346821/21 – 14 homes). Part of the allocation at Huddersfield Road / Dunkerley Street (M4) has received planning permission (after the SHLAA 2024 monitoring period) in September 2024 for 53 homes.
  - Bailey Mill (H1.1.5) received planning permission in 2023 for 60 homes (FUL/350293/22);
  - Three are active employment sites (Pretoria Road (H1.1.23), Jowett Street (H1.1.25) and the remaining land of H1.1.24 fronting Rochdale Road, Royton; and
  - Two have received planning permission in the past, 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.
- 4.10. Hartford Mill (H1.1.27) received planning permission for demolition and redevelopment in 2019 - demolition has since been carried out. A detailed application for major residential development on the site is currently being prepared.
- 4.11. For the remaining phase 1 allocations, whilst it is considered these are developable post 5-year supply it is acknowledged that there may be issues preventing these sites from coming forward, whether it be site constraints, multiple ownerships or viability issues.
- 4.12. In terms of the phase 2 housing allocations, six out of the eight allocations remain within the housing land supply. Planning permission has been granted for 234 dwellings in total on Land at Knowls Lane (H1.2.10) (approximately 121 dwellings on the housing allocation). Three dwellings were granted planning permission and are under construction on a small part of Ashton Road, Woodhouses (H1.2.3). The remaining part of the allocation has also recently gained planning permission as part of FUL/352724/24 – permissioned for 41 dwellings in March 2025. There is also an application pending a decision for residential development at Lilac View Close, Shaw (H1.2.6) (FUL/353940/25).

### *Lapsed and Stalled Sites*

- 4.13. 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.
- 4.14. In the lapsed and stalled category there are 34 sites with a capacity of 5 dwellings or more<sup>44</sup>, which collectively are able to provide around 587 dwellings. Two of these sites have a capacity of between 50 to 100 dwellings:
- Phoenix Mill, Cheetham Street, Failsworth, Manchester, M35 9DS – brownfield site identified for around 89 dwellings; and
  - 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 – brownfield site identified for around 72 dwellings.
- 4.15. There are no sites in this category with a capacity of 100+ dwellings.
- 4.16. HLA2664 Land at Derker (Abbotsford Road), a previously large, lapsed site, has received planning permission, as part of a wider development (FUL/350118/22) for 47 dwellings, after the SHLAA monitoring period (April 2024). This site will move to the permissioned category at the next SHLAA update.
- 4.17. Several other lapsed and stalled sites have been assessed and amended as part of the SHLAA 2024 update, including amending site capacity based on updated constraints/ density assumptions and amending site boundaries, for example.
- 4.18. 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 the viability and other constraints that need to be overcome. The former Hartford Mill was derelict and having a detrimental impact on the surrounding area and preventing some sites at North Werneth from coming forward. However, as set out above, demolition has since been carried out and as such it is anticipated that the remaining surrounding sites at North Werneth will start to come forward soon.
- 4.19. For these reasons, the majority of the 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. However, land at Derker (Abbotsford Road Site), was identified within the five-year supply (2024-2029) as it is council owned and at the time of assessment was the subject of a pending planning application (as part of wider development within the area - FUL/350118/22). The application has since received planning permission (April 2024). In addition, land at Ward Lane, Diggle has been identified in the five-year supply as it is council owned and is being considered for development.

### *Housing Land Supply by Land Use*

- 4.20. A significant proportion of the housing land supply as at 1 April 2024 includes sites that are currently in other uses, such as employment, but there are reasons to

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<sup>44</sup> 5 and above dwellings is the threshold for consideration of sites within the SHLAA for those without extant planning permission/ under construction.

assume that housing could be achievable at some point in the future. A portion of the housing land supply is also on sites in key locations such as Oldham Town Centre, and on sites which are in council ownership. Table 7 overleaf sets out the supply by land use.



Table 7: Breakdown of Housing Land Supply by Land Use

	Total no. of sites	Total no. of dwellings	% of sites in active employment use (whole or in part)	% of dwellings on sites in active employment use (whole or in part)	% of sites on mill sites	% of dwellings on mill sites	% of sites within Oldham Town Centre	% of dwellings on sites within Oldham Town Centre	% of Council owned sites	% of dwellings on Council owned sites
% of supply			9%	21%	6%	16%	13%	27%	9%	29%
Number of sites/ dwellings	448	12,910	40	2,723	25	2,123	58	3,441	41	3,742

- 4.21. Table 7 shows that 9% (40 sites) of the total number of sites in the housing land supply (448 sites) are in active employment use, which represents 21% (2,723 dwellings) of the total number of dwellings in the housing land supply (12,910 dwellings).
- 4.22. 6% (25 sites) of the total number of sites in the housing land supply are on mill sites, which represents 16% (2,123 dwellings) of the total number of dwellings in the housing land supply. In addition, to the 40 sites in active employment use, some of these mills are also in active employment use (at least in part of the mill building).
- 4.23. 13% (58 sites) of the total number of sites within the housing land supply are within Oldham Town Centre, representing 27% (3,441 dwellings) of the total number of dwellings in the housing land supply.
- 4.24. Finally, 9% (41 sites) of the total number of sites within the housing land supply are council-owned. This represents 29% (3,742 dwellings) of the total number of dwellings in the housing land supply. Several sites are also within the ownership of other public bodies and registered providers who work in partnership with the council.
- 4.25. For currently occupied sites, reasons which may make such a site suitable for inclusion within the housing land supply include:
- the site has been suggested as potential housing land in the future through the Call for Sites process by the owner;
  - it is within an existing predominantly residential area;
  - land adjacent to or close to the site has been granted planning 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 means that a current or former use is no longer viable or appropriate.

#### *Housing Land Supply by Type*

- 4.26. Table 8 below shows that 61% of all homes identified as part of the 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. A further 14% of the housing land supply is on mixed sites. As such, 75% of the housing land supply is on brownfield or mixed sites.

Table 8: Breakdown of Housing Land Supply as at 1 April 2024 by Land Type

Category	Brownfield	Greenfield	Mixed	Total
Under construction	1,213	88	680	1,981
Extant planning permission	428	508	10	946
Saved UDP Phase 1 housing allocations	360	0	15	375

Category	Brownfield	Greenfield	Mixed	Total
Saved UDP Phase 2 housing allocations	0	187	0	187
Lapsed and stalled sites	521	24	42	587
Potential & pending sites	5,329	280	747	6,356
PfE Strategic Allocations	0	2,118	360	2,478
<b>Total</b>	<b>7,851</b>	<b>3,205</b>	<b>1,854</b>	<b>12,910</b>

4.27. 84% of the new homes identified on potential and pending sites and 89% on lapsed and stalled sites fall on brownfield land. Therefore, there is a need to continue to ensure that brownfield sites come forward for development. As outlined below a significant proportion of these sites are for between 50 to 199 homes and 200+ homes, offering opportunities to broaden the scale of development opportunities across the borough.

#### *Housing Land Supply by Size*

4.28. Table 9 shows that 46% of the supply is made of large-scale major sites (200 dwellings and above) and 33% on sites of between 50 and 199 dwellings. 15% of the supply is on sites with a capacity of 10 to 49 dwellings and 6% of the supply is on minor sites with a capacity to deliver less than 10 dwellings. In total, 94% of the supply is made up of major sites (10 dwellings and above).

4.29. The supply identifies that out of 159 major sites, only 16 of them are identified as large-scale major sites (200+ dwellings). Of the major sites, the average site size is 76 homes. This means that the average size of site is relatively small, however it is in keeping with the hectareage and physical characteristics of sites which make up the housing land supply in Oldham.

4.30. The PfE Strategic Allocations make up several of the large-scale major sites (200+ dwellings) and sites of between 50-199 dwellings:

- JPA10 Beal Valley – 482 dwellings
- JPA12 Broadbent Moss – 1,374 dwellings<sup>45</sup>
- JPA13 Chew Brook Vale – 138 dwellings
- JPA14 Cowlshaw – 222 dwellings<sup>46</sup>
- JPA15 Land south of Coal Pit Lane – 175 dwellings

<sup>45</sup> The total allocation capacity was for around 1,450 dwellings. 77 dwellings were completed within the allocation (Hebron Street) in 2020.

<sup>46</sup> The total allocation capacity is for 460 dwellings. Two out of three parcels within the allocation are currently under construction (Cowlshaw Abbatoir and Land south of Denbigh Drive) and included within the 'Under Construction' category within the housing land supply. 222 dwellings is the remaining un-permissioned capacity within the allocation.

- JPA16 South of Rosary Road – 60 dwellings

- 4.31. PfE Strategic Allocation JPA11 Bottom Field Farm is also included within the housing land supply but has an allocation capacity 30 dwellings (the site has extant planning permission for 27 dwellings).
- 4.32. The council will support the delivery of several of these allocations, including Beal Valley, Broadbent Moss, Chew Brook Vale, Land south of Coal Pit Lane and South of Rosary Road. Whilst the remaining allocations (Bottom Field Farm and Cowlshaw) will be delivered independently in line with landownerships.
- 4.33. The potential and pending site category include the most sites of between 50-199 dwellings and sites of 200+ dwellings. 84% of the total number of sites within this category are identified as being capable of delivering 50-200+ dwellings. The dwellings identified on sites of this size within the potential and pending category represent 41% of all dwellings identified within the housing land supply.
- 4.34. The potential sites provide an opportunity to respond to some of the issues identified by the evidence in relation to build-out rates and the lack of larger sites coming forward for development. However, a number of these sites are still identified within the long-term supply period, with some capacity even falling post-plan period (post-2039). As such, there is still a need to identify opportunities to bring large sites forward sooner.

Table 9: Breakdown of Housing Land Supply as at 1 April 2024 by Size

Category	Total no. of sites	Total no. of dwellings	No of sites <10 dwellings	No of dwellings on sites of <10 dwellings	No. of major sites of 10 to 49 dwellings	No. of dwellings on major sites of 10 to 49 dwellings	No. of major sites of 50 to 199 dwellings	No. of dwellings on major sites of 50 to 199 dwellings	No. large scale major sites (200+ dwellings)	No. of dwellings on large scale major sites (200+ dwellings)
Under construction	147	1,981	120	279	16	272	8	489	3	941
Extant planning permission	151	946	136	260	11	216	3	236	1	234
Lapsed and stalled sites	34	587	13	81	19	345	2	161	0	0
Phase 1 Housing Allocations	8	375	0	0	5	107	3	268	0	0
Phase 2 Housing Allocations	5	187	0	0	3	58	2	129	0	0
Potential & pending sites	96	6,356	20	134	41	872	26	2703	9	2647
PfE Strategic Allocations	7	2,478	0	0	2	87	2	313	3	2078
<b>Total</b>	<b>448</b>	<b>12,910</b>	<b>289</b>	<b>754</b>	<b>97</b>	<b>1957</b>	<b>46</b>	<b>4299</b>	<b>16</b>	<b>5900</b>

### *Oldham Town Centre*

4.35. The large-scale major sites and sites of between 50-199 dwellings include key sites within Oldham Town Centre, which form part of the council's Town Centre Development Framework. The Development Framework is guided by the vision established in the 'Creating a Better Place' Strategic Framework which is outlined in section 1 of this report. A key part of the Development Framework is to support the delivery of development opportunity sites, which are within council-ownership, for housing and mixed-use development.

4.36. Whilst this is an emerging project and identified sites and indicative capacities may change as evidence develops, several of the development opportunity sites are identified within the housing land supply for 2024 (within the Potential and Pending site category), as set out below<sup>47</sup>:

- Civic Centre, West Street with an indicative capacity of around 600 homes;
- Land between Prince Street, Oldham Way and Mumps, and Land at Wallshaw Street, with an indicative capacity of around 400 homes across both sites;
- Former Magistrates Court and Manchester Chambers, Barn Street with an indicative capacity of 225 homes;
- Former Leisure Centre Site, Lord Street with an indicative capacity of around 250 homes;
- Land at Waterloo Street with an indicative capacity of around 250 homes;
- Bradshaw Street with an indicative capacity of around 150 homes; and
- Henshaw House with an indicative capacity of 45 homes.

3.34. As set out in section 3 above, since the publication of the SHLAA (January 2025) planning applications have been submitted in April 2025 for several key sites (listed above) within the town centre, including - Former Magistrates Court, King Street, Oldham – OUT/354323/25; Manchester Chambers, West Street, Oldham, OL1 1LF – OUT/354325/25; Former Civic Centre & Queen Elizabeth Hall, West Street, Oldham, OL1 1UT – OUT/354338/25; Land At Prince's Gate, Prince Street, Oldham, OL1 3TL – OUT/354326/25; and Former Leisure Centre, Rock Street, Oldham – OUT/354324/25.

4.37. The Town Centre Development Framework will support the master planning and delivery of these large-scale sites, which coupled with the delivery of the PfE Strategic Allocations, will directly respond to an issue identified within the previous Housing Delivery Test Action Plan of a limited number of large-scale sites coming forward for development.

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<sup>47</sup> Since the publication of the SHLAA further scoping/ refining work has been carried out and will inform capacities on these sites as appropriate in future SHLAA updates.

### *Housing Land Supply by Owner*

4.38. As table 10 shows 27% of the housing land supply is on local authority owned sites. These sites offer significant opportunities to boost housing delivery across the borough in line with the council's priorities. In addition to this, a proportion of the mixed ownership category includes sites which are also part-owned by the local authority, which presents an opportunity for new ways of partnership working to bring these sites forward.

4.39. There is also a proportion of sites owned by Registered Affordable Housing Providers enabling new ways of partnership working and the delivery of new affordable homes.

Table 10: Breakdown of housing land supply as at 1 April 2024 by landowner

	Local Authority	Registered Provider	Other public body	Private	Mixed	Total
Under construction	468	88	0	1,425	0	1,981
Extant planning permission	0	0	0	946	0	946
Saved UDP Phase 1 housing allocations	15	0	0	202	158	375
Saved UDP Phase 2 housing allocations	78	0	0	109	0	187
Lapsed and stalled sites	62	0	0	453	72	587
Potential & pending sites	2,889	0	0	3,467	0	6,356
PfE Strategic Allocations	0	0	0	2,478	0	2,478 <sup>48</sup>
<b>Total</b>	<b>3,512</b>	<b>88</b>	<b>0</b>	<b>9,080</b>	<b>230</b>	<b>12,910</b>

### *Five-year Housing Land Supply Position*

4.40. The SHLAA as at 1 April 2024 sets out the council's latest five-year housing land supply position. The housing land supply is constantly evolving with new sites gaining permission, sites being completed and potential land coming forward.

4.41. Paragraph 78 of the revised NPPF (December 2024) sets out that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing

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<sup>48</sup> Oldham Council also owns a small portion of land within the Beal Valley PfE Strategic Allocation, although it is not identified for development.

requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

- 4.42. PfE was adopted on 21 March 2024. As PfE is less than five years old, JP-H1 continues to set out Oldham's housing requirement until 2029.
- 4.43. Policy JP-H1 identifies a stepped housing requirement (minimum) for Oldham of 404 homes per year for 2022-2025, 680 homes per year for 2025-2030, and 772 homes per year for 2030-2039. This equates to an annual average of 680 new homes per year.
- 4.44. For the five-year housing land supply looking forward from 1 April 2024, Oldham's housing requirement is calculated as an average of one year of 404 homes per year (which applies to 2024-2025) and four years of 680 homes per year (which applies to 2025-2029), as per JP-H1. This equates to an average annual requirement of 624.8 homes per year for the five-year period of 2024-2029 or a total requirement of 3,124 homes.
- 4.45. As of 1 April 2024, the five-year supply contains sufficient land to accommodate 3,520 dwellings. Compared to the housing requirement, this represents a 5.6-year supply or 112% of the housing required for the five-year period (taking clearance allowance into account).
- 4.46. As such, the council can currently demonstrate a five-year supply of housing against our adopted housing requirement (as set out in policy JP-H1 of PfE) and provide a buffer (or flexibility allowance) as is required by paragraph 78 of the NPPF. Therefore, the presumption in favour of sustainable development (paragraph 11 (d)) does not apply.
- 4.47. However, in line with the stepped housing requirement set out in PfE, the increase in housing requirement at each 'step' presents a challenge in ensuring the delivery of housing can be maintained in line with the requirement. Whilst the requirement has been devised based on identified housing land supply over the plan period, the actual delivery of the identified supply remains important in ensuring this is met in a timely manner.
- 4.48. The five-year housing land supply position is updated annually and is published as part of the SHLAA and authorities Monitoring Report.
- 4.49. The post five-year housing land supply identifies a further 9,980 dwellings which are expected to be delivered beyond 2029 (including 756 dwellings expected to be delivered beyond 2039). These are on sites that would either require a full or reserved matters application, a new planning application, construction would need to resume or, for potential and pending sites, be granted planning permission for housing.



## 5 Engagement

- 5.1. As set out in section 1, in February 2024 Oldham Council held a Housing Roundtable event<sup>49</sup>. Senior representatives from all of Oldham's major social housing providers were at the event, along with private landlords, letting agents, developers and housebuilders, charities and more.
- 5.2. Some of the main issues discussed include:
- the national problem of a shortage of housing supply, driven by factors such as the high costs of renting and home ownership;
  - the lack of Government funding to invest in social homes;
  - differences in the definition of truly "affordable" homes, and a reduction in the supply of social and affordable housing.
- 5.3. Nationally, the Government has stopped incentivising developers to build truly affordable homes, with funding provided through the Government's Affordable Homes Programme (AHP) being slashed, which intensifies the need further.
- 5.4. At the same time, demand for those homes is increasing, as people are affected by the cost-of-living crisis and are struggling with rising mortgage interest rates - meaning they may not be able to afford to pay or get on the housing ladder at all.
- 5.5. Risks of further increasing housing demand pressures were also identified as population growth, people living independently for longer, increasing risk of homelessness and the lack of properties available.
- 5.6. Local issues such as housing standards, housing demand and supply were discussed and the council and the partners considered how they could work together to tackle the issues locally.
- 5.7. As part of this Roundtable event, the council – with the support of its partners - pledged to build 500 new social homes over the next five years for residents to meet local housing needs.
- 5.8. Following on from this event, a workstream of actions was developed. The actions are a shared responsibility across various teams at the council and each action relates to distinct issue areas, such as housing supply, including affordable and social housing.
- 5.9. Actions related to housing supply include, tackling empty homes, bringing them back into use and identifying a residential pipeline – a live database which clearly sets out a supply of future housing and includes a breakdown of housing tenure and indicative delivery period.
- 5.10. Further information and progress on these actions are included within part 2 of this Action Plan.
- 5.11. In addition to the Roundtable event, regular engagement with key housing delivery stakeholders is carried out through the Strategic Housing Group. This group meets

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<sup>49</sup> Oldham Council Housing Roundtable Event (2024):  
[https://www.oldham.gov.uk/news/article/2618/tackling\\_the\\_housing\\_crisis\\_500\\_new\\_social\\_homes\\_coming\\_to\\_oldham\\_announced\\_at\\_oldham\\_housing\\_roundtable\\_event](https://www.oldham.gov.uk/news/article/2618/tackling_the_housing_crisis_500_new_social_homes_coming_to_oldham_announced_at_oldham_housing_roundtable_event)

around every 3 months and brings to together Registered Providers, Developers, Council Officers, elected Members and other key stakeholders. It provides strategic direction and advice on key housing issues facing the borough and oversees the delivery of the Housing Strategy Action Plan, which includes ways to increase housing delivery and supply.

- 5.12. The Council plans to hold a further engagement event in early 2025/26. Senior representatives from Oldham's social housing providers, and developers will be accompanied by the Housing Delivery team to discuss barriers to housing delivery in the borough.
- 5.13. Furthermore, as part of the engagement carried out for previous HDT Action Plans, several potential reasons for the under-delivery of housing were found and potential solutions identified. Many of these are still applicable and the evidence continues to inform actions identified for improving housing delivery within this Action Plan (as identified in part 2).
- 5.14. For example, to inform the preparation of the HDT Action Plan in 2021 a housing delivery developer questionnaire was sent to identified developers, housebuilders, registered providers and agents operating in the borough. The questionnaire sought views and comments on housing delivery issues and opportunities in Oldham.
- 5.15. The main findings in terms of how prolific housing delivery issues are in Oldham compared to other Greater Manchester authorities, were that in general housing delivery issues affecting Oldham were not unique to the borough and indeed it is considered that the issues are apparent across Greater Manchester boroughs. However, some respondents noted that the tightly defined Green Belt in Oldham, particularly to the east of the borough, is an issue for Oldham in particular.
- 5.16. It was also noted that generally low house prices, viability and difficult brownfield sites were an issue in Oldham. Although respondents highlighted those issues of low house prices were an issue across the east of Greater Manchester housing market area, in particular.
- 5.17. Ongoing engagement with key housing delivery stakeholders is important to support housing delivery within the borough and will continue to be carried out.

## 6 Summary of housing delivery and supply issues in Oldham

6.1. Analysis of housing delivery and the make-up of the housing land supply identifies several issues, which may impact housing delivery within the borough. In summary, these are:

- Delivery of Oldham's housing requirement, as set out in PfE. The housing requirement is stepped over three periods and will increase significantly from 2025/26 onwards. It is important that housing delivery is maintained in line with the housing requirement.
- There is a need to deliver affordable housing to meet local housing needs, including social homes. The council, and its partners, have committed to delivering 500 social homes over the next five years.
- There is a need to continue to ensure that brownfield sites come forward for development - 75% of the housing land supply is on brownfield or mixed land, with a significant proportion (79% of the supply) 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 85% of sites granted planning permission in the last ten years. However, whilst the number of major sites coming forward is more limited (15% of sites granted planning permission in the last ten years), they continue to form a significant proportion of the supply, accounting for 75% of dwellings granted planning permission over the last ten years.
- 'Major' sites in Oldham are still relatively small with most sites within the housing land supply (97 sites out of a total 159 major sites) having a capacity of under 50 dwellings, and the average site size of major sites is for 76 dwellings. However, the SHLAA identifies 16 large-scale major sites (of over 200 dwellings)<sup>50</sup>. The number of major sites identified in the housing land supply are as follows:
  - Number of major sites of 10 to 49 dwellings – 97
  - Number of major sites of 50 to 199 dwellings – 46
  - Number of large-scale major sites of 200+ dwellings – 16
- We need to continue to increase the number of major sites coming forward and support them in delivery where appropriate, in particular those with a capacity of 100 to 200+ dwellings as the analysis indicates that these are more attractive for housebuilders and 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 limited at present. However, the number of large-scale sites is expected to increase in line with the identified future housing land supply,

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<sup>50</sup> See SHLAA (2024) Appendix 1a for breakdown of sites:

[https://www.oldham.gov.uk/downloads/download/1350/appendix\\_1a\\_shlaa\\_schedule\\_of\\_sites\\_by\\_category](https://www.oldham.gov.uk/downloads/download/1350/appendix_1a_shlaa_schedule_of_sites_by_category)

including large-scale sites within Oldham Town Centre and the PfE Strategic Allocations expected to come forward over the next 5-15 years.

- Delivery of minor sites - evidence indicates that for minor sites where they are for individual houses there may not be the impetus or the ability to deliver the dwelling quickly, owing to constraints such as cost or availability of construction materials and labour.
- Over-reliance on sites outside the planning system – with 77% of the housing land supply (as at 1 April 2024) made up of potential housing sites that do not currently have any planning permission (although some may have been considered for housing through the planning system such as those with lapsed permissions and identified allocations).
- Issues around the implementation of planning permissions which may, for example, be due to viability and deliverability.
- Availability of grant support to help bring sites forward, such as GMCA Brownfield Land Fund and One Public Estate Brownfield Funding, are geared towards larger sites. There is a need for dedicated support for SME<sup>51</sup> developers to bring smaller sites forward.

6.2. Actions to tackle these housing delivery and supply issues will be considered in part 2 of this Action Plan.

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<sup>51</sup> Small and medium enterprises (SME)

## 7 Appendix

### Appendix 1 - Implementation rates from 01/04/2013 to 31/03/2023

Year	No. of sites granted permission	Capacity of sites granted permission	No. dwellings completed on these sites	No. dwellings under construction on these sites	No. dwellings not started but development has been implemented on these sites	No. dwellings not started but site still has extant permission/prior approval	No. dwellings lapsed on these sites	Overall lapse rate (%)	Housing Requirement <sup>52</sup>
2013/14	75	481	407	8	5	0	60	12%	289
2014/15	64	940	582	38	28	0	49	5%	289
2015/16	87	567	486	6	10	0	56	10%	289
2016/17	63	928	479	7	138	0	256	28%	446
2017/18	90	535	401	14	24	0	72	13%	660
2018/19	68	293	215	40	4	0	20	7%	717
2019/20	99	843	422	13	61	0	73	9%	633
2020/21	70	445	262	88	36	2	17	4%	461
2021/22	86	820	324	213	203	76	n/a	n/a	677
2022/23	80	817	191	331	107	186	n/a	n/a	404
<b>TOTAL</b>	<b>782</b>	<b>6,669</b>	<b>3,769</b>	<b>758</b>	<b>616</b>	<b>264</b>	<b>603</b>	<b>11%</b>	

<sup>52</sup> From 2015/16 onwards, this column shows the housing requirement as is set out within the HDT measurement (applicable to the individual year), which takes into account previously unmet need/ under-delivery of housing against an adopted housing requirement or that identified by the standard methodology for calculating local housing need.



# **Oldham's Housing Delivery Action Plan: Part Two**

**June 2025**

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## 1 Introduction

### **Purpose of the Report**

- 1.1 Part 1 of the Action Plan sets out the context and evidence of housing delivery and supply within Oldham.
- 1.2 Part 2 sets out the individual actions identified by the council to improve delivery and ensure that we provide a diverse housing offer that is attractive and meets the needs of different sections of the population at different stages of their lives.
- 1.3 An Action Plan is intended to be a practical document, focused on effective measures aimed at improving delivery underpinned by local evidence and research of key issues. It is a live document, reviewed and updated as appropriate.
- 1.4 This is Oldham Council's fifth Action Plan, produced in response to the Housing Delivery Test 2023 results published in December 2024.

## 2 Summary of root cause analysis, housing delivery and supply issues

### Key Issues

- 2.1 Analysis of housing delivery and the make-up of the housing land supply, set out within part one of this Action Plan, identifies a number of issues, which together may impact housing delivery within the borough. In summary, these are:
- Oldham's housing requirement, as set out in Places for Everyone (PfE), needs to be met each year. The housing requirement is stepped over three periods and will increase significantly from 2025/26 onwards. It is important that housing delivery is able to be maintained in line with the housing requirement.
  - There is a need to deliver affordable housing to meet local housing needs, including social homes. The council, and its partners, have committed to delivering 500 social homes by 2029.
  - There is a need to continue to ensure that brownfield sites come forward for development - 75% of the housing land supply is on brownfield or mixed land, with a significant proportion (79% of the supply) 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 85% of sites granted planning permission in the last ten years. Whilst the number of major sites coming forward is more limited (15% of sites granted planning permission in the last ten years), they continue to form a significant proportion of the supply, accounting for 75% of dwellings granted planning permission over the last ten years.
  - 'Major' sites in Oldham are still relatively small with the majority of sites within the housing land supply (97 sites out of a total 159 major sites) having a capacity of under 50 dwellings, and the average site size of major sites is for 76 dwellings. However, the Strategic Housing Land Availability Assessment (SHLAA) identifies 16 large-scale major sites (of over 200 dwellings)<sup>1</sup>. The number of major sites identified in the housing land supply are as follows:
    - Number of major sites of 10 to 49 dwellings – 97
    - Number of major sites of 50 to 199 dwellings – 46
    - Number of large-scale major sites of 200+ dwellings – 16
  - We need to continue to increase the number of major sites coming forward and support them in delivery where appropriate, particularly those with a capacity of 100 to 200+ dwellings as the analysis indicates that these are more attractive for housebuilders and 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 limited at present. However, the number of large-scale sites is

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<sup>1</sup> See SHLAA (2024) Appendix 1a for breakdown of sites:  
[https://www.oldham.gov.uk/downloads/download/1350/appendix\\_1a\\_shlaa\\_schedule\\_of\\_sites\\_by\\_category](https://www.oldham.gov.uk/downloads/download/1350/appendix_1a_shlaa_schedule_of_sites_by_category)

expected to increase in line with the identified future housing land supply, including large-scale sites within Oldham Town Centre and the PfE Strategic Allocations expected to come forward over the next 5-15 years.

- Delivery of minor sites - evidence indicates that for minor sites where they are for individual houses there may not be the impetus or the ability to deliver the dwelling quickly, owing to constraints such as cost or availability of construction materials and labour.
- Over-reliance on sites outside the planning system – with 77% of the housing land supply (as at 1 April 2024) made up of sites that do not currently have any planning permission (although some may have been considered for housing through the planning system such as those with lapsed permissions and identified allocations).
- Issues around the implementation of planning permissions which may, for example, be due to viability and deliverability.
- Availability of grant support to help bring sites forward, such as the Greater Manchester Combined Authority (GMCA) Brownfield Land Fund and One Public Estate Brownfield Funding, are geared towards larger sites. There is a need for dedicated support for SME developers to bring smaller sites forward.

### 3 Housing Delivery Action Plan

- 3.1 Oldham Council and its partners have had many successes in recent years that have helped improve housing in Oldham, as identified in the Council's Housing Strategy. However, there is a need to ensure that we continue to provide housing to meet local housing needs.
- 3.2 As is set out in part 1 of this Action Plan, Oldham Council declared a local housing crisis in February 2024. The demand for truly affordable housing, such as social homes, is outstripping supply. As part of the council's response to the crisis, the council and its partners have committed to delivering 500 social homes by 2029. In addition, our response to the housing crisis includes a series of other priorities such as, bringing empty homes back into use and working with developers and partners to deliver various types of housing across the borough.
- 3.3 The council intends to refresh the Housing Strategy in the near future to respond to the housing crisis and to embed the findings of the Local Housing Needs Assessment (LHNA) update. This will inform future Housing Delivery Action Plans as appropriate.
- 3.4 Reflecting on the housing crisis and the housing delivery analysis identified in part 1 – Housing Delivery Context, Evidence and Root Cause Analysis, several actions have been identified aimed at increasing delivery across the borough. For each action, tasks and expected outcomes are identified and progress is noted at each Housing Delivery Test Action Plan update, against each task<sup>2</sup>.
- 3.5 The identified actions, tasks and progress updates contained within this Action Plan, are summarised below and set out in full within Appendix 1.
- 3.6 The actions are structured around the following themes:
- Improving capacity and processes.
  - Increasing the delivery of sites within our housing land supply, on brownfield land.
  - Delivery of the council's ambition to improve and increase the housing offer within Oldham.

#### Improving capacity and processes

- 3.7 Actions within this theme focus on improving the accuracy and efficiency of decision making processes in relation to planning applications. Ensuring that there is an efficient planning application process can support the delivery of housing by making the planning application process more transparent, collaborative, quicker and as a result more attractive for applicants (including housebuilders and developers who can often choose where they develop housing schemes).
- 3.8 The following actions have been identified under this theme:
- Continue and improve member training, as appropriate, including updating members on new relevant legislation and policy;
  - Improve officer and member knowledge and understanding of viability;
  - Review and improve residential planning application processes; and

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<sup>2</sup> Some existing tasks (from previous Action Plans) have been updated as part of this Action Plan and some have been newly introduced as part of this Action Plan, as is noted in the full table in Appendix 1.

- Improve engagement with developers/ housing providers;
- 3.9 Continuous member training is important in ensuring efficient and accurate decision making of planning applications. This action includes several tasks including providing annual training to Planning Committee members, provide updates regarding changes to legislation and policy, reviewing the Scheme of Delegation for planning applications and member call-ins. In terms of progress on this action, member training is carried out annually and members are regularly updated of legislative and policy changes, including that related to the revised National Planning Policy Framework (NPPF) which was published in December 2024. Also, the Planning Scheme of Delegation was revised in 2020.
- 3.10 Improving officer and member knowledge and understanding of viability is important in ensuring the implications of viability on planning matters are appropriately considered as part of decision making. Viability constraints may impact the delivery of policy requirements, such as open space or affordable housing. As such, it is important that instances where a negated/ reduced policy requirement may be acceptable owing to viability, as is set out in NPPF, is understood and applications are decided in line with planning policy. Viability is covered in annual Planning Committee member training. Strategic Planning officers will support Development Management colleagues in the interpretation of viability policy within the revised NPPF, as required.
- 3.11 Several tasks have been identified which could deliver the action of improving the residential planning application process:
- Introduce a pre-application advice service that incorporates a 'one team' approach to ensure more effective communication and consistent messaging regarding planning priorities and requirements – this task is complete – a pre-application service has been in place since 2018.
  - Improve the efficient execution of S106 agreements (reducing the time taken to secure agreements and improving the monitoring of those that are in place) – this task is ongoing – the Infrastructure Funding Statement is incorporated into the authorities Monitoring Report providing information on S106 agreements secured and monies spent.
  - Review planning obligations and priorities to provide clarity regarding planning requirements – this task will be actioned as part of the Local Plan Review which will consider planning obligations, including potentially identifying priorities.
  - Introduce the use of Planning Performance Agreements (PPA's) for larger-scale developments and more complex housing sites – this task is complete - PPA's were introduced as part of the pre-application service.
- 3.12 Improving engagement with developers and housing providers is important in ensuring these key stakeholders have a wider understanding of issues regarding local housing needs and delivery. To do this, the task of continuing the dialogue with developers and registered providers through the Strategic Housing Group and holding six-monthly developer forums (as appropriate) has been identified. This task is ongoing - the Strategic Housing Group meets around every 3 months.
- 3.13 Also, in February 2024 a Housing Roundtable held by the council brought together key stakeholders to discuss housing issues within the borough and identify actions to

address Oldham's housing crisis collaboratively. This is detailed further under the 'Increasing delivery of sites within the housing land supply' theme below.

### Increasing the delivery of sites within the housing land supply

3.14 Actions within this theme focus on increasing the supply and delivery of sites within the housing land supply, particularly on brownfield land. Ensuring there is a sufficient and attractive supply of sites is important in enabling opportunities for housing delivery. In addition, it is important that these sites come forward and deliver high-quality housing in a timely manner. Actions identified within this theme include:

- Identify deliverable and viable housing sites across the borough and support their delivery, with a focus on brownfield land;
- Identifying opportunities for the re-use of vacant buildings to deliver new homes;
- Support small site development; and
- Support the delivery of social homes, including delivering 500 new social homes over the next four years.

3.15 In terms of identifying and supporting the delivery of viable housing sites, several tasks have been identified:

- Review the housing land supply and support the delivery of key housing sites through the Housing Delivery Pipeline. The housing land supply is updated annually and key housing sites have been identified as part of the council's Housing Delivery Pipeline. Section 4 and appendix 2 of this Action Plan sets out the key housing sites.
- Prepare planning/ development briefs for key housing sites, where appropriate, providing clear direction regarding policy framework, requirements and expectations (including obligations and standards) – this task is ongoing - the council has prepared several development briefs for key housing sites in council ownership, including Southlink, Former South Chadderton and Kaskenmoor school sites, land at Higher Lime and Phase 2 sites. There are 10 Phase 2 sites, aiming to deliver small parcels of land for mixed tenure housing.
- Identify suitable opportunities for the delivery of larger scale 'major' sites within the urban area, capable of providing 100/200+ dwellings through future SHLAA reviews and identify mechanisms to facilitate their delivery – this task is ongoing - the number of 100/200+ dwelling sites in the housing land supply has increased. Several large sites are identified within Oldham Town Centre, as part of the Oldham Town Centre Development Framework, which will facilitate their delivery. Several large-scale sites are also identified as PfE Allocations.
- Review and improve the Brownfield Register to facilitate delivery of brownfield land – the Brownfield Register is reviewed and amended annually as per updated regulations (latest published December 2024).
- Review and improve constraints information available to facilitate delivery of brownfield land, such as the use of the Brownfield Site Risk Calculator – this task is ongoing - site constraints data has been reviewed/ updated as part of the Local Plan Review. The Brownfield Ground Risk Calculator may be used in

the future. The Brownfield Land Fund is supporting the delivery of brownfield land.

- Support the delivery of housing on brownfield land, including through identifying available funding streams and supporting landowners to access support in bringing brownfield land forward for development – this task is ongoing - Oldham Council is working with the GMCA to support housing on brownfield land through the Brownfield Land Fund. 10 sites in Oldham have accessed funding as a result. A further 3 sites within Oldham Town Centre have also been granted One Public Estate Brownfield Land Funding, and further sites may access this fund in the future. Sites are identified within Appendix 3.
- Continue to enable members of the public to put forward suitable, achievable and available sites for housing delivery for consideration as part of future SHLAA reviews – this task is ongoing - sites can be put forward to the council for consideration as part of the annual SHLAA update. Sites were also able to be put forward for consideration as part of the Draft Local Plan consultation that was held in early 2024.
- Identify opportunities to package suitable sites together and explore and maximise funding opportunities to bring key housing sites forward – this task is ongoing - linked to the delivery of key housing sites through the Residential Delivery Pipeline. As part of this process, a collection of four council-owned sites in Derker have been packaged and put forward for development (which now has planning permission).

3.16 In terms of identifying opportunities for the re-use of vacant buildings to deliver new homes, the task of engaging with owners of vacant buildings and exploring options for bringing empty homes back into use, in line with the Empty Homes Strategy, has been identified. This task is ongoing - work is underway as part of the Empty Homes Strategy to engage with owners of vacant properties and consider offering options to support re-use, including Purchase Repair and Lease and Repair<sup>3</sup>. Should owners not engage, enforcement options such as Empty Dwelling Management Orders (EDMO), Compulsory Purchase and Enforced Sales Procedure (ESP)<sup>4</sup>, may be considered. In addition, the council's Mill Strategy identifies opportunities for repurposing mills for homes.

3.17 Two tasks have been identified to support small site development:

- Explore opportunities for facilitating and supporting the delivery of self-build, custom-build and community-led housing through providing guidance on how to

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<sup>3</sup> Purchase Repair is where a Local Authority purchases the empty property and carries out the necessary repairs to bring it back into use. If the property has been empty for 6 months or more, and the owner wishes to sell, the Local Authority could offer a market value price for the property, which includes the cost of any repairs necessary to bring the property back into use to a decent home standard. On completion this property will then be let out. Lease and Repair is where a Local Authority repair/refurbish a property identified through the empty homes offer. On completion of the property to a decent home standard, it can then be sublet to a tenant via a Housing Association/Partner.

<sup>4</sup> Empty Dwelling Management Order (EDMO) is a process which allows the Council to take over the management of empty residential properties with a view to agree with the owner a plan to bring them back into occupation. Compulsory Purchase is legal mechanism by which certain bodies (known as 'acquiring authorities') can acquire land without the consent of the owner. Enforced Sales Procedure (ESP) is a process where the Council would recover costs by applying a land charge on a property following completion of the works to bring it back into useable standard, for example for derelict properties.



bring forward those sites – this task is ongoing - opportunities and policies for [self-build, custom-build](#)<sup>5</sup> and community-led housing, are being considered as part of the Local Plan Review.

- Identify suitable council-owned small sites for housing development and support the delivery of housing on these sites – this task is ongoing - the council is actively working to identify and bring forward small sites for housing development. Several small sites such as Hilda Street and James Street have been identified as part of the housing land supply and are identified in Appendix 2<sup>6</sup>.

3.18 To ensure the delivery of social homes, including delivering 500 new social homes by 2029, the task of supporting developers/ registered providers access funding and working with council partners to bring suitable sites forward, has been identified. This task is ongoing - a Housing Roundtable was held in February 2024. Senior representatives from all of Oldham's major social housing providers, along with private landlords, letting agents, developers and housebuilders, charities and more, discussed Oldham's housing crisis and how partners can work together to tackle it. As part of this Roundtable, Oldham Council pledged to deliver 500 new social homes within the borough by 2029. Further information is available online<sup>7</sup>.

### Delivery of the council's ambition to improve and increase the housing offer within Oldham

3.19 Actions within this theme focus on the council's ambition to improve and increase the housing offer within Oldham<sup>8</sup>.

3.20 The Housing Strategy sets out the ambition to create attractive housing opportunities or a 'housing offer' which offers choice in terms of affordability, tenancy options, and housing type, is attractive to young or old people, provides supported housing for vulnerable people, includes options for community-led housing, is accessible to large and inter-generational families and is of a good quality and condition.

3.21 Actions within this theme include:

- Support the implementation of the Housing Strategy;
- Support the implementation of the Oldham Town Centre Development Framework; and
- Support the implementation of the Local Plan and other local planning documents.

3.22 A 2024/25 update to the Local Housing Needs Assessment (2019) has recently been prepared and will be available on the council's website. This will inform the Housing Strategy refresh, the Local Plan Review and other relevant strategies as appropriate.

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<sup>5</sup> Oldham's self and custom build register can be joined online at: [https://www.oldham.gov.uk/forms/form/366/custom\\_build\\_register](https://www.oldham.gov.uk/forms/form/366/custom_build_register)

<sup>6</sup> See 'HRA infill' sites in Appendix 2 'Council-owned'.

<sup>7</sup> Oldham Council Housing Roundtable Event: [https://www.oldham.gov.uk/news/article/2618/tackling\\_the\\_housing\\_crisis\\_500\\_new\\_social\\_homes\\_coming\\_to\\_oldham\\_announced\\_at\\_oldham\\_housing\\_roundtable\\_event](https://www.oldham.gov.uk/news/article/2618/tackling_the_housing_crisis_500_new_social_homes_coming_to_oldham_announced_at_oldham_housing_roundtable_event)

<sup>8</sup> Oldham's Housing Strategy (2019), 'Housing Offer' page 7, available at: [https://www.oldham.gov.uk/downloads/file/5561/housing\\_strategy\\_2019](https://www.oldham.gov.uk/downloads/file/5561/housing_strategy_2019)



- 3.23 In addition, the task of supporting the development of 'District Growth Plans' is identified. District Growth Plans are proposed to guide the future growth of Oldham's five districts, which may support opportunities for housing development, where appropriate. The development of District Growth Plans is ongoing and they will form a similar function to 'Place Plans', as was recommended by the Housing Strategy.
- 3.24 In terms of supporting the implementation of the Oldham Town Centre Development Framework (as part of the 'Creating a Better Place' vision, including the focus on residential development with the delivery of around 2,000 new homes), Muse are the council's development partner for this project and will support the delivery of the Framework and 2,000 new homes.
- 3.25 The Framework identifies development opportunity sites for new homes which will inform the housing land supply and site allocations, identified as part of the Local Plan Review, as appropriate. Muse has published the [development framework](#), outlining the priority sites of Civic Centre, Former Leisure Centre, Former Magistrates Court, Former Manchester Chamber and Princes Gate. Community consultation took place in March 2025. Planning applications have since been received for six core sites in April 2025 (Former Magistrates Court; Manchester Chambers; Former Civic Centre & Queen Elizabeth Hall; Land At Prince's Gate; and Former Leisure Centre).
- 3.26 In terms of supporting the implementation of the Local Plan and other local planning documents, three tasks were identified:
- Support and input into the delivery of the Places for Everyone Joint Development Plan Document (DPD) – this task has been completed. PfE was adopted on 21 March 2024, becoming part of Oldham's Local Plan.
  - Progress the review of Local Plan – this task ongoing - Oldham's Draft Local Plan was published for consultation in January 2024. Further stages and the timetable for the Local Plan are set out in the Local Development Scheme<sup>9</sup>.
  - Prepare the Oldham Design Code setting out guidance regarding planning requirements and standards relating to new housing development – this task is ongoing - Oldham Code to be developed as part of Local Plan Review.

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<sup>9</sup> Local Development Scheme, available at:  
[https://www.oldham.gov.uk/info/201231/emerging\\_planning\\_policy/230/local\\_development\\_scheme\\_timetable](https://www.oldham.gov.uk/info/201231/emerging_planning_policy/230/local_development_scheme_timetable)

## 4 Key Housing Sites

### Identifying Key Housing Sites

- 4.1 The previous Action Plan identified 'priority sites' for housing development. As set out above, these priority sites have been re-termed as 'key housing sites' and have been updated in line with the Residential Delivery Pipeline which has been developed since the previous Action Plan. This section identifies the key housing sites which make up the Residential Delivery Pipeline.
- 4.2 These sites will aim to increase the number of homes built within Oldham and diversify the housing offer within the borough. Several of the sites will be supported through to delivery by the council, including assisting in site investigation, access to funding, planning application preparation and on-site delivery, where appropriate.
- 4.3 The sites have largely been informed by the housing land supply identified within the SHLAA (as at 1 April 2024). However, some site details have been updated slightly since the publication of the SHLAA, and as such may differ, for example where emerging evidence has identified an amended capacity, timescale for delivery or density assumption etc. All sites will be updated where necessary as part of the next SHLAA review (as at 1 April 2025).
- 4.4 The timeline for the delivery of these sites is identified indicatively, informed by the SHLAA or other evidence. This sets out an indicative time period for when it is expected that these sites will be delivered – short term (0-5 years), medium term (5-10 years) and long term (10+ years) - and is reviewed annually.
- 4.5 The characteristics of each site will determine the extent of support required to deliver the sites, for example, some of the large-scale town centre sites and PfE allocations will require longer-term support due to the scale and wider regeneration required to facilitate delivery, whilst some of the less strategic sites or non-council owned sites may be delivered quickly and with less support required from the council.
- 4.6 Three categories of sites - council-owned sites, sites delivered by council partners/ with council support, and privately-owned/ delivered sites - have been identified. Only privately-owned sites capable of providing 5 dwellings and above are included in this appendix. The full supply of sites to be delivered (including small sites under 5 dwellings) is available within the SHLAA (2024).
- 4.7 A breakdown of the sites within each category is set out in Appendix 2 (contained within a separate document).

### Council-owned sites

- 4.8 Council-owned sites are sites which are owned by the council and are actively being promoted and/or delivered by the council. In owning the sites, the council has greater autonomy over their development, including being able to specify development requirements, such as the level and type of affordable housing, in line with the council's priorities. As set out above, development briefs are in the process of being prepared for some of these sites. The briefs will inform prospective developers of the councils' ambitions and requirements for development of the site.

- 4.9 In terms of the sites identified within the residential pipeline, in total the council-owned sites have the opportunity to provide around 3,815 homes (on 24 sites) over the short to long term (up to 2039)<sup>10</sup>. Approximately 1,357 of these homes are expected to be delivered in the short term (2024-2029).
- 4.10 In 2024/ 25 houses have been delivered on Fitton Hill (55 homes completed during 2024/25), which is still largely under construction. Vaughan Street (46 homes in total), Broadway Green R4 (42 homes in total), Derker (132 homes in total) and Foundry Street (15 homes in total) have also commenced development during 2024/25. Planning permission has also been granted on Broadway Green R3 for 101 homes in March 2025. Once completed these sites will provide a mix of private, affordable and social homes in the borough.
- 4.11 A number of sites in this category are still under construction, and when complete will provide housing for care leavers, those on the housing register, and market sale housing.
- 4.12 It is anticipated that around 626 of the 3,417 homes will be for social homes and a further 746 will be other types of affordable homes (e.g. shared ownership/ affordable rented). Around 2,045 will be market sales homes. These tenure splits may change, and more sites may become available for affordable housing over time, as many sites are identified within the medium to long term timescales and therefore tenure split is not yet defined.

### Sites delivered by council partners or with council support

- 4.13 This category includes sites which are being delivered with the council's partners, such as Registered Affordable Housing Providers or Specialist Housing Providers. It also includes sites which may be delivered by the council's partners or privately, but where the council may have a supporting role (master planning, land assembly or supporting access to funding).
- 4.14 In total there are 3,086 homes (on 15 sites) identified as being deliverable by council partners or those with council support, over the short to long term<sup>11</sup>. Approximately 377 of these homes are expected to be delivered in the short term (2024-2029).
- 4.15 During 2024/25 several sites within this category have fully completed delivering 255 homes, including:
- 18 homes at Hale Lane/ Hughes Close;
  - 51 homes at Land North of Ashton Road.
  - 88 homes at West Vale; and
  - 98 homes at Maple Mill

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<sup>10</sup> Some sites are under construction and as such may have delivered homes onsite already. This figure represent the total homes remaining as at 1 April 2024 (or later) depending on the availability of in-year completions data.

<sup>11</sup> Some sites are under construction and as such may have delivered homes onsite already. This figure represent the total homes remaining as at 1 April 2024 (or later) depending on the availability of in-year completions data.

- 4.16 These sites provide a mix of market/ affordable and social homes, supporting Temporary Accommodation Needs and providing additional affordable housing in Oldham.
- 4.17 Currently, the split of market / affordable / social homes is not known for many of the sites within this category as this is often not finalised until planning application stage and several do not currently have planning permission.
- 4.18 Of those which have planning permission or where the split is identified, around 132 homes will be for social homes, which are all expected to be delivered in the short term. A further 200 homes are identified for other types of affordable homes (e.g. shared ownership/ affordable rented). These tenure splits may change, and more sites may become available for affordable housing over time. These sites will also deliver some market sales housing.
- 4.19 This category includes several of the PfE Strategic Allocations, such as JPA10 Beal Valley and JPA12 Broadbent Moss, where the council is currently supporting the master planning of the site, including addressing supporting infrastructure requirements.

### Privately-owned sites

- 4.20 Privately-owned sites are sites which are privately-owned and being delivered privately by a landowner or developer. This is the largest category of sites and is the most subject to change as it includes a significant number of sites without planning permission and sites identified as being deliverable within the medium to long term. Indeed, sites within this category may move to the 'delivered by council partners or with council support' category over time.
- 4.21 As stated above, appendix 2 excludes sites within this category which are identified to deliver less than 5 dwellings (small sites). Whilst the SHLAA provides the full supply of such sites - there are approximately 218 sites (336 homes) with a site capacity of less than 5 homes – which are either permissioned or under construction and are therefore expected to complete within the short term – which are privately-owned.
- 4.22 In total the privately-owned sites shown in appendix 2 have the potential to deliver 6,048 homes (on 186 sites) over the short to long term.
- 4.23 As with the previous category, the split of market / affordable / social homes is not known for many of the sites within this category as this is often not finalised until planning application stage and many do not currently have planning permission and are identified within the medium to long term delivery timescales.
- 4.24 However, of the sites which have planning permission or where the split is identified, around 275 affordable homes (for shared ownership or affordable rent) and 53 social homes are identified. These are all expected to be delivered within the short-medium term.
- 4.25 Of the 186 privately owned sites (of 5 homes and above as shown within appendix 2) with an indicative capacity of 6,048 homes:
- 25 sites (721 homes) have a extant planning permission;
  - 52 sites (1,177 homes) are under construction; and
  - 111 sites (4,150 homes) do not have planning permission currently.

## 5 Implementation and Monitoring

- 5.1 The Action Plan will be reviewed and updated on an annual basis.
- 5.2 Monitoring and governance arrangements regarding the implementation of the Action Plan will be aligned with the council's Monitoring Report (AMR) and SHLAA.

## 6 Appendix

### Appendix 1 Housing Delivery Actions

#### Improving capacity and process actions

Action required	Task description	Expected outcomes	Progress update
Continue and improve member training as appropriate.	Continue to provide annual training to Planning Committee members with interim updates as required.	Better understanding of the role and process of the Planning Committee.	Member training is carried out annually.  The recently published Planning and Infrastructure Bill <sup>12</sup> introduces legislative changes to the planning system, including the introduction of mandatory training for planning committee members is undertaken before they can make planning decisions. This is to ensure greater consistency in decision making.
	Provide updates regarding changes to legislation and policy to members as appropriate.	Better understanding of the role and process of the Planning Committee.	Members are regularly updated of legislative and policy changes.
	Review process in consultation with members as appropriate for delegating planning applications and member call-ins. Including a review of the Planning Scheme of Delegation.	No more than 5% of planning applications are determined by Planning Committee.	Complete - Planning Scheme of Delegation revised in 2020.  The Planning and Infrastructure Bill introduces legislative changes to the planning system, including planning committee reforms through a national scheme of delegation <sup>13</sup> . The intention is to ensure greater consistency and certainty in decision making across LPAs.

<sup>12</sup> Planning and Infrastructure Bill (March 2025): <https://bills.parliament.uk/bills/3946>

<sup>13</sup> The National Scheme of Delegation will set out which planning applications should be delegated to officers and which applications should go to planning committee.

Action required	Task description	Expected outcomes	Progress update
			Further updates to NPPF are expected when the bill is approved, and the changes will then come into force. Future Action Plans will consider this measure as appropriate.
Improve officer and member knowledge and understanding of viability.	Improve officer and member knowledge and understanding of viability, particularly in relation to the delivery of strategic housing sites.	A better understanding of viability issues and constraints.	Seeking external viability advice on non-policy compliant planning applications.  Members training is carried out annually (as part of planning committee training).
Review and improve residential planning application processes	Introduce a pre-application advice service that incorporates a 'one team' approach to ensure more effective communication and consistent messaging regarding planning priorities and requirements.  Monitoring the use of the pre-application service to understand any issues with the service and be able to respond accordingly.	Better communication between council departments and provision of consistent advice to prospective developers.	Complete - Pre-application service has been in place since 2018.  Monitoring of the pre-application service is on-going.
	Improve the efficient execution of S106 agreements.	Reducing the time taken to secure agreements and improving the monitoring of those that are in place.	On-going.  Infrastructure Funding Statement is incorporated into the authorities Monitoring Report providing information on S106 agreements secured and monies spent.
	Review planning obligations and priorities to provide clarity regarding planning requirements.	Greater understanding regarding council priorities and clarification (for developers)	To be actioned – the Local Plan Review will consider planning obligations, including potentially identifying priorities.

Action required	Task description	Expected outcomes	Progress update
		regarding the council's expectations.	
	Introduce the use of Planning Performance Agreements (PPA's) for larger-scale developments and more complex housing sites.	Agreement on realistic determination timescales and increase in the number of PPA's.	Complete - PPA's introduced as part of the pre-application service.
Improve engagement with developers/ housing providers	Continue the dialogue with developers and registered providers through the Strategic Housing Group (proposed as part of the Housing Strategy) and holding six-monthly developer forums as appropriate.	A wider understanding of issues regarding housing delivery and more effective implementation and monitoring of the Housing Delivery Action Plan.	On-going – The Council hold regular workshops with developers to understand barriers to housing delivery.  Additionally, the Strategic Housing Group is due to restart with Registered Partners and Developers/  This is detailed further under the 'Increasing delivery of sites within the housing land supply, in particular on brownfield sites' theme below.

#### Increasing the delivery of sites within the housing land supply actions

Action required	Task description	Expected outcomes	Progress update
Identify deliverable and viable housing sites across the borough and support their delivery, with a focus on brownfield land.	<p>Previous task: Review the housing land supply (including lapsed and stalled sites) and identify 'priority' sites and prepare a supporting delivery plan to set out how these will be brought forward, and their delivery reviewed.</p> <p>Updated task: Review the housing land supply and support the delivery of key</p>	<p>Previous expected outcomes: An action plan setting out how 'priority' sites will be delivered. The action plan will be reviewed and updated regularly to demonstrate how the council, and its partners, are facilitating the delivery of housing.</p> <p>Updated expected outcomes: A housing delivery</p>	<p>On-going</p> <p>The housing land supply is reviewed as part of the annual update.</p> <p>The pipeline is a live project which will support and monitor the delivery of sites and will be updated regularly.</p> <p>This action has been updated accordingly.</p> <p>Appendix 2, which in the previous version</p>



Action required	Task description	Expected outcomes	Progress update
	housing sites through the Housing Delivery Pipeline.	pipeline identifying the key housing sites that will be delivered. The pipeline will be reviewed and updated regularly to demonstrate how the council, and its partners, are facilitating the delivery of housing.	identified 'priority sites', now identifies the Housing Delivery Pipeline.
	Prepare planning/ development briefs for key housing sites where appropriate, providing clear direction regarding policy framework, requirements and expectations (including obligations and standards).	Preparation of planning/ development briefs for key housing sites where appropriate.	On-going.  To support the delivery of key housing sites, the council has prepared development briefs for key housing sites in council ownership, including Southlink. Former South Chadderton and Kaskenmoor school sites and land at Higher Lime. Development briefs are also being developed for Phase 2 sites which are smaller parcels of land across the borough to provide between 5-11 houses per site.
	Identify suitable opportunities for the delivery of larger scale 'major' sites within the urban area, capable of providing 100/200+ dwellings through future SHLAA reviews and identify mechanisms to facilitate their delivery.	Identification of opportunities for the delivery of larger scale 'major' sites in the urban area.	On-going.  As identified in part 1 of this Action Plan, the number of 100/200+ dwelling sites in the housing land supply has increased. In particular, there are several within Oldham Town Centre, as part of the Oldham Town Centre Development Framework, which will facilitate their delivery. Key sites in Oldham Town Centres and others in the housing land supply have been identified as potential

Action required	Task description	Expected outcomes	Progress update
			<p>allocations in the Draft Local Plan. Several large-scale sites are also identified as PfE Allocations.</p> <p>As set out in the Action Plan (part 1) planning applications have been submitted for six large town centre sites in April 2025 (Former Magistrates Court; Manchester Chambers; Former Civic Centre &amp; Queen Elizabeth Hall; Land At Prince's Gate; and Former Leisure Centre).</p>
	Review and improve the Brownfield Register to facilitate delivery of brownfield land.	Increased delivery of housing sites on brownfield land.	Brownfield Register reviewed and amended annually as per updated regulations (latest Register published <a href="#">December 2024</a> ).
	Review and improve constraints information available to facilitate delivery of brownfield land, such as the use of the Brownfield Site Risk Calculator.	Increased delivery of housing sites on brownfield land.	<p>On-going.</p> <p>Site constraints data has been reviewed and updated as part of the Local Plan Review. The Brownfield Ground Risk Calculator may be used in the future. Supporting the delivery of brownfield land has been considered by the Brownfield Land Fund, as set out within a new action below.</p>
	Support the delivery of housing on brownfield land, including through identifying available funding streams and supporting landowners to access support in bringing brownfield land	Increased delivery of housing sites on brownfield land.	<p>On-going.</p> <p>Oldham Council is working with the GMCA to facilitate and support landowners to bring forward housing on brownfield land through the Brownfield Land Fund. 10 sites in Oldham have accessed funding</p>

Action required	Task description	Expected outcomes	Progress update
	forward for development.		<p>as a result. A further 3 sites within Oldham Town Centre have also been granted One Public Estate Brownfield Land Funding, and further sites may access this fund in the future. Since the previous action plan, works have commenced on site. OPE works have started on site and are due for completion soon.</p> <p>Sites are identified within Appendix 3.</p>
	Continue to enable members of the public to put forward suitable, achievable and available sites for housing delivery for consideration as part of future SHLAA reviews.	Members of the public can put forward a suitable, achievable and available site for housing delivery as part of an open Call for Sites that will feed into SHLAA updates as appropriate.	<p>On-going</p> <p>Sites can be put forward to the council for <a href="#">consideration</a> as part of the annual SHLAA) update<sup>14</sup>.</p> <p>The Draft Local Plan also consulted upon proposed site allocations and members of the public were able to put forward additional sites for consideration as part of this consultation.</p>
	Identify opportunities to package suitable sites together and explore and maximise funding opportunities to bring key housing sites forward.	Delivery of residential development on sites that may not otherwise be developed.	<p>On-going.</p> <p>Linked to the delivery of key housing sites through the Housing Delivery Pipeline.</p> <p>As part of this process, a collection of four council-owned sites in Derker have been packaged and put forward for development. Derker has started on site, with the construction of 132 homes. Completion is due in 2026.</p>

<sup>14</sup> On-going SHLAA 'Call for Sites':

[https://www.oldham.gov.uk/info/201230/monitoring/2134/strategic\\_housing\\_land\\_availability\\_assessment\\_shlaa](https://www.oldham.gov.uk/info/201230/monitoring/2134/strategic_housing_land_availability_assessment_shlaa)

Action required	Task description	Expected outcomes	Progress update
Identifying opportunities for the re-use of vacant buildings to deliver new homes.	<p>Previous task: Improve collection of information on vacant buildings to identify those that may have the potential for re-use as residential. Align with business rates and Empty Homes Strategy.</p> <p>Updated task: Engage with owners of vacant buildings and explore options for bringing empty homes back into use, in line with the Empty Homes Strategy.</p>	Identification of vacant buildings with the potential for re-use as residential as part of the housing land supply.	<p>On-going.</p> <p>Work is underway as part of the Empty Homes Strategy to engage with owners of vacant properties and consider offering options to support re-use, including: Purchase Repair and Lease and Repair<sup>15</sup>. Should owners not engage, enforcement options such as Empty Dwelling Management Orders (EDMO), Compulsory Purchase and Enforced Sales Procedure (ESP)<sup>16</sup>, may be considered. The council has identified circa. 2000 empty homes.</p> <p>In addition, the council's Mill Strategy identifies opportunities for repurposing mills for homes and has helped to inform the preparation of the borough's housing land supply.</p>
Support small site development	Explore opportunities for facilitating and supporting the delivery of self-build, custom-build and community-led	Increase delivery of self-build, custom-build and community-led housing.	<p>On-going.</p> <p>Opportunities and policies for <a href="#">self-build</a>, <a href="#">custom-build</a><sup>17</sup> and community-led housing is</p>

<sup>15</sup> Purchase Repair is where a Local Authority purchases the empty property and carries out the necessary repairs to bring it back into use. If the property has been empty for 6 months or more, and the owner wishes to sell, the Local Authority could offer a market value price for the property, which includes the cost of any repairs necessary to bring the property back into use to a decent home standard. On completion this property will then be let out. Lease and Repair is where a Local Authority repair/refurbish a property identified through the empty homes offer. On completion of the property to a decent home standard, it can then be sublet to a tenant via a Housing Association/Partner.

<sup>16</sup> Empty Dwelling Management Order (EDMO) is a process which allows the Council to take over the management of empty residential properties with a view to agree with the owner a plan to bring them back into occupation. Compulsory Purchase is legal mechanism by which certain bodies (known as 'acquiring authorities') can acquire land without the consent of the owner. Enforced Sales Procedure (ESP) is a process where the Council would recover costs by applying a land charge on a property following completion of the works to bring it back into useable standard, for example for derelict properties.

<sup>17</sup> Oldham's self and custom build register can be joined online at: [https://www.oldham.gov.uk/forms/form/366/custom\\_build\\_register](https://www.oldham.gov.uk/forms/form/366/custom_build_register)

Action required	Task description	Expected outcomes	Progress update
	housing through providing guidance on how to bring forward those sites.		being considered as part of the Local Plan Review.
	Identify suitable council-owned small sites for housing development and support the delivery of housing on these sites.	Increase delivery of housing on small sites which otherwise may not be developed.	On-going.  The council has identified a portfolio of Phase 2 smaller sites to bring forward for housing development. Development briefs are being prepared for 12 small sites including James Street, Hilda Street and Flint Street. These sites have been identified as part of the housing land supply.
Support the delivery of social homes, including delivering 500 new social homes over the next five years.	Support the delivery of social homes as a truly affordable housing option, including through supporting developers/ providers access funding and working with council partners to bring suitable sites forward.	Increase the number of social homes available to reduce demand for this type of housing on the council's affordable housing needs register. Meet the council's target of 500 new social homes over the next five years.	Ongoing.  A Housing Roundtable was held in February 2024. Senior representatives from all of Oldham's major social housing providers were at the event, along with private landlords, letting agents, developers and housebuilders, charities and more. Together with the council, they discussed Oldham's housing crisis and how partners can work together to tackle it.  At this Roundtable, as a response to the housing crisis, Oldham Council pledged to deliver 500 new social homes within the borough over the next 5 years. Further information is available <a href="#">online</a> <sup>18</sup> .

<sup>18</sup> Oldham Council Housing Roundtable Event:  
<https://www.oldham.gov.uk/news/article/2618/tackling-the-housing-crisis-500-new-social-homes-coming-to-oldham-announced-at-oldham-housing-roundtable-event>

Action required	Task description	Expected outcomes	Progress update
			Through using its own land and working with partners, the Council has identified suitable sites to deliver 540 new social homes over the next 5 years. Several sites, which will deliver 126 homes in total, have already commenced.

#### Delivery of the council's ambition to improve and increase the housing offer within Oldham

Action required	Task description	Expected outcomes	Progress update
Support the implementation of the Housing Strategy	Implementation of the council's Housing Strategy 2019 Delivery Plan.	Delivery of Housing Strategy 2019 ambitions and outcomes.	On-going.  A update to the LHNA (2019) has been completed and will be available on the council's website.  A refresh of the Housing Strategy is intended in the near future to respond to the housing crisis and embed findings from the LHNA update. This will inform future Housing Delivery Test Action Plans.
	Previous task: Planning officers to contribute towards the preparation of 'Place Plans' and 'Housing Insights', identified in the council's Housing Strategy, to inform the Local Plan process.  Updated task: Support the development of 'District Growth Plans'.	Previous expected outcomes: Place Plans and Housing Insights are in place as appropriate.  Updated expected outcomes: District Growth Plans are in place to guide the future growth of Oldham's districts, which may support opportunities for housing	On-going.  The previous action plan noted that 'Place Plans' and 'Housing Insights' would be prepared to inform future growth of the borough's districts. In 2023, the preparation of District Growth Plans began, commencing with the West District. These will form a similar function to 'Place Plans', as was recommended by the Housing Strategy.

Action required	Task description	Expected outcomes	Progress update
		development, where appropriate.	<p>District Growth Plans will identify opportunities for future growth and development of districts based on local stakeholder ambitions, including identifying necessary infrastructure interventions.</p> <p>In terms of Housing Insights, the Draft Local Plan Housing Topic Paper<sup>19</sup> will provide an in-depth analysis of the borough's housing context.</p>
Support the implementation of the Oldham Town Centre Development Framework	Support implementation of the Oldham Town Centre Development Framework as part of the 'Creating a Better Place' vision, including the focus on residential development with the delivery of around 2,000 new homes.	Delivery of residential development, in line with the Framework, to meet local housing needs and deliver future housing growth.	<p>The Framework identifies development opportunity sites for new homes which will inform the housing land supply and site allocations, identified as part of the Local Plan Review, as appropriate.</p> <p>Muse have been appointed as the council's development partner for this project and will support the delivery of the Framework, including around 2,000 homes within the town centre.</p> <p>Ongoing - Consultation period closed in March 2025.</p> <p>Planning applications have been received in April 2025 for six core development sites.</p>
Support the implementation of the Local Plan and other local	Support and input into the delivery of Places for Everyone Joint DPD.	Adoption of Places for Everyone Joint DPD.	Complete - Places for Everyone came into effect on 21 March 2024,

<sup>19</sup> Draft Local Plan Housing Topic Paper, available at: [https://www.oldham.gov.uk/downloads/file/7879/housing\\_topic\\_paper](https://www.oldham.gov.uk/downloads/file/7879/housing_topic_paper)

Action required	Task description	Expected outcomes	Progress update
planning documents.			becoming part of Oldham's Local Plan.
	Progress the review of Local Plan.	<p>Previous expected outcome: Progression to next stage of Local Plan Review (Draft Plan).</p> <p>Updated expected outcome: Progression to next stage of Local Plan Review (Publication Plan).</p>	<p>Oldham's Draft Local Plan was published for consultation in January 2024.</p> <p>Further stages and the timetable for the Local Plan are set out in the <a href="#">Local Development Scheme</a><sup>20</sup>.</p>
	An update to the Affordable Housing Interim Planning Position paper is being prepared, in the form of a 'Housing Delivery Interim Planning Position Paper' informed by the updated evidence set out in the LHNA update (2024).	Provide guidance on existing Local Plan policies, to provide clarity and consistency in decision-making.	An updated Housing Delivery Interim Planning Position Paper is being prepared and will be available on the council's website in summer 2025.
	Preparation of the Oldham Design Code setting out guidance regarding planning requirements and standards relating to new housing development.	Clarity regarding planning policy requirements.	<p>On-going.</p> <p>Oldham Design Code to be developed as part of Local Plan Review.</p>

<sup>20</sup> Local Development Scheme, available at:  
[https://www.oldham.gov.uk/info/201231/emerging\\_planning\\_policy/230/local\\_development\\_scheme\\_timetable](https://www.oldham.gov.uk/info/201231/emerging_planning_policy/230/local_development_scheme_timetable)



## Appendix 2: Key Housing Sites

6.1 Contained within a separate document.

## Appendix 3: Sites with Brownfield Land Funding

Site Name	Developer Partner	Number of Homes	Funding Source
Derker sites (Land at Abbotsford Road, Evelyn Street, London Road and Former Cromform Mill)	Hive Homes	132 homes	GMCA Brownfield Land Fund
Westvale (Land at Vale Drive/ Former Crossbank House)	First Choice Homes	88 homes	GMCA Brownfield Land Fund
Bulcote Lane	Countryside Properties	48 homes	GMCA Brownfield Land Fund
Maple Mill	MCI	96 homes	GMCA Brownfield Land Fund
Moss Hey Street, Shaw	Great Places	65 homes	GMCA Brownfield Land Fund
Mumps, Princes Gate	Muse	347 homes	GMCA Brownfield Land Fund
Foundry Street, Coldhurst	Jigsaw	15 homes	GMCA Brownfield Land Fund
Thatcher and Belgrave Road	First Choice Homes	19 homes	GMCA Brownfield Land Fund
Vaughan Street, Royton	Great Places	46 homes	GMCA Brownfield Land Fund
Holt Street	Great Places	53 Homes	GMCA Brownfield Land Fund
Former Leisure Centre, Lord Street	Muse	250 homes	One Public Estate Brownfield Land Fund
Former Magistrates Court and Manchester Chambers	Muse	125 homes	One Public Estate Brownfield Land Fund
Civic Centre, West Street	Muse	200 homes	One Public Estate Brownfield Land Fund

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Site Category	Site Name	Site Reference	Size (acres)
Delivered with partners/ with council support	Hardman Street	HLA2090	0.65
Delivered with partners/ with council support	Hartford Mill	HLA2663/ HLA2662	6.70
Delivered with partners/ with council support	Land off Hale Lane/Hughes Close,	HLA2842	1.00
Delivered with partners/ with council support	Land at Mosshey St, Shaw	HLA3028	0.67
Delivered with partners/ with council support	Westvale (Former Crossbank Hou	HLA3860	1.70
Delivered with partners/ with council support	Maple Mill	HLA3861	4.60
Delivered with partners/ with council support	Shaw Street	HLA3989	0.79
Delivered with partners/ with council support	Land north of Ashton Road	HLA4065	1.30
Delivered with partners/ with council support	Thatcher and Belgrave Street, Hat	HLA4160	0.87
Delivered with partners/ with council support	Beal Valley	JPA10	126.60
Delivered with partners/ with council support	Broadbent Moss	JPA12	185.50
Delivered with partners/ with council support	Chew Brook Vale	JPA13	13.30
Delivered with partners/ with council support	Land South of Coal Pit Lane	JPA15	49.20
Delivered with partners/ with council support	South of Rosary Road	JPA16	6.60
Delivered with partners/ with council support	Mecca Bingo	SHA1314	3.45

Total Number of Units Private and Affordable (indicative)	Number of Market Housing (indicative)	Number of Affordable Housing (not incl. social homes) (indicative)	Number of Social Housing (indicative)	Planning Permission Confirmed (Y/N)	Site Progress/ SHLAA 2024 Status	Remaining homes to be delivered
14	0	14	0	Y	Under construction	14
230	Unknown	Unknown	Unknown	N	Lapsed & stalled	230
18	0	18	0	Y	Under construction	18
65	0	31	34	Y	Under construction	65
88	0	88	0	Y	Under construction	88
98	0	0	98	Y	Under construction	92
30	0	30	0	Y	Under construction	30
51	Unknown	Unknown	Unknown	Y	Under construction	51
19	0	19	0	Y	Under construction	19
482	Unknown	Unknown	Unknown	N	PfE Strategic Allocation	482
1,374	Unknown	Unknown	Unknown	N	PfE Strategic Allocation	1,374
138	Unknown	Unknown	Unknown	N	PfE Strategic Allocation	138
175	Unknown	Unknown	Unknown	N	PfE Strategic Allocation	175
60	Unknown	Unknown	Unknown	N	PfE Strategic Allocation	60
250	Unknown	Unknown	Unknown	N	Potential site	250

Delivery Period (Short 0- 5yrs/Medium 5- 10yrs/ Long 10+yrs)	Delivery 2024-2029	Delivery 2029-2034	Delivery 2034-2039	Delivery 2039+
Short	14	0	0	0
Medium	0	230	0	0
Short	18	0	0	0
Short	65	0	0	0
Short	88	0	0	0
Short	92	0	0	0
Short	30	0	0	0
Short	51	0	0	0
Short	19	0	0	0
Medium-long	0	402	80	0
Medium-long	0	317	806	376
Medium-long	0	100	38	0
Medium-long	0	168	7	0
Medium	0	60	0	0
Long	0	0	250	0

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