

Delegated Cabinet Member Key Decision Report

Decision Maker and Portfolio area:	Councillor Roberts, Cabinet Member for Housing In consultation with Emma Barton, Director of Economy
Date of Decision:	16 December 2021
Subject:	Strategic Housing Land Availability Assessment (SHLAA) 2021
Report Author:	Lauren Hargreaves
Ward (s):	All wards

Reason for the decision:

Summary:	To seek approval for the publication of Oldham Council's Strategic Housing Land Availability Assessment (SHLAA) as of 1 April 2021.
<i>What are the alternative option(s) to be considered? Please give the reason(s) for recommendation(s):</i>	Option 1 - To approve and publish the SHLAA, as at 1 April 2021, in full to provide evidence for the housing land supply position and Local Plan review. Option 2 - To not approve and publish the SHLAA, as at 1 April 2021.

Recommendation(s):

It is recommended to approve and publish the SHLAA as at 1 April 2021 as per option one. A fully assessed SHLAA provides the evidence base for identifying sites to be included in the housing land supply and for other requirements such as the Brownfield Land Register. It means the council has a full understanding of its currently available land supply which helps to inform decisions on allocating land in the future and can be used by the development industry to identify land with potential for housing development within the borough. Not publishing a full SHLAA leaves the council with an outdated published housing land supply position and does not effectively promote the potential supply of housing land within the borough to interested parties for development.

Implications:

*What are the **financial** implications?*

As the report / plans will be published on the Council's Intranet and no hard copies will be needed, there will be no printing costs associated with the proposals in this report. Any associated revenue expenditure will be met from within the Planning services existing revenue budget.
(Jamie Kelly)

*What are the **procurement** implications?*

N/A

*What are the **legal** implications?*

The Council is required to prepare a SHLAA in accordance with the provisions of the National Planning Policy Framework so that it has a clear understanding of the land available in its area.
(A Evans)

*What are the **Human Resources** implications?*

N/A

***Equality and Diversity Impact Assessment** attached or not required because (please give reason)*

This is a technical document, which forms part of the Local Plan evidence base. The Local Plan will be supported by an Equality and Diversity Impact Assessment.

*What are the **property** implications*

The SHLAA forms a key component of the evidence base which will underpin housing policies and land allocations in Places for Everyone (PfE) (formerly the Greater

Manchester Spatial Framework - GMSF) and the Oldham Local Plan and therefore its early publication is fully supported, in order that appropriate sites can be brought forward for compliant development at the earliest opportunity.

(Bryn Cooke)

No risk comments provided.

The purpose of producing a SHLAA is to provide a publicly available, up to date position on potential housing land within the borough. This complements the council's priorities and objectives under the Cooperative Agenda.

Risks:

Co-operative agenda

Has the relevant Legal Officer confirmed that the recommendations within this report are lawful and comply with the Council's Constitution? Yes

Has the relevant Finance Officer confirmed that any expenditure referred to within this report is consistent with the Council's budget? Yes

Are any of the recommendations within this report contrary to the Policy Framework of the Council? No

Reason why this Is a Key Decision

(2) to be significant in terms of its effects on communities living or working in an area comprising two or more Wards or electoral divisions in the area of the local authority.

The Key Decision made as a result of this report will be published within **48 hours** and cannot be actioned until **five working days** have elapsed from the publication date of the decision, i.e. before 24 December 2021, unless exempt from call-in.

This item has been included on the Forward Plan under reference HSG-11-21

There are no background papers for this report

Report Author Sign-off:	
	Lauren Hargreaves
Date:	03.12.2021

Please list any appendices:-

Appendix number or letter	Description
1	SHLAA Main Report
2	Appendix 1a: SHLAA Schedule of Sites by Category
3	Appendix 1b: SHLAA Schedule of Sites by Ward
4	Appendix 2: Housing Land Supply Borough Map
5	Appendix 3a: SHLAA Ward Maps
6	Appendix 3b: Detailed Potential Site Assessment Tables
7	Appendix 4: Discounted Sites table
8	Appendix 5: Update on 2020 SHLAA sites

Background:

- 1.1 The Strategic Housing Land Availability Assessment (SHLAA) is a technical document comprising a list of sites that make up the five-year housing land supply and identifies sites which might have potential for housing at some stage in the future. The requirement to undertake a SHLAA is set out in paragraph 68 of the National Planning Policy Framework (NPPF). NPPF states that a housing assessment should be used to help identify sufficient supply and mix of sites, taking into account their availability, suitability and the likely achievability (economic viability) of land.
- 1.2 The SHLAA forms a key component of the evidence base which will underpin land allocations in Places for Everyone (PfE) (formerly the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF)) and Oldham's Local Plan (and informs the council's Brownfield Land Register). This will help the Local Plan to meet the area's housing needs and demonstrate whether we can provide a continuous five

years' supply of housing land. It also identifies potential development land for up to fifteen years after the Local Plan is adopted. References to PfE relate to the Places for Everyone Publication Plan published in August 2021, which can be viewed on the GMCA's website here: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/>

- 1.3 NPPF references the need for local planning authorities to use evidence such as the SHLAA to ensure the Local Plan meets the area's housing needs and to ensure a continuous five years' supply of deliverable housing land. Additionally, this evidence will contribute to identifying specific sites or broad locations for growth for a further six to ten years and beyond, as well as providing evidence for any windfall site allowance.
- 1.4 Whilst the SHLAA is an important evidence source it does not determine whether a site should be allocated for development. Instead, the purpose of the assessment is to provide information on a range of options to allow an informed decision to be made on which sites are most suitable to meet needs. The Council will then be able to plan proactively by choosing sites to go forward into relevant development plan documents.
- 1.5 As such, it is important to bear the following points in mind:
 - *The SHLAA only identifies opportunities for future residential use and sets out the extent of land which could potentially be available; it does not allocate sites for development. Allocation will take place through the PfE, Local Plan or any Neighbourhood Plan.*
 - *The identification of a site in the SHLAA does not imply that planning permission will be granted if an application were submitted. All planning proposals will continue to be assessed as part of the detailed planning application process and be considered against the appropriate policies in the adopted Local Plan and any other material considerations, including national planning guidance.*
 - *The identification of a site for housing in the SHLAA does not preclude them from being considered or granted permission for other uses. Equally, if a site is not included in the SHLAA, this does not mean it may not be considered suitable should it come forward for residential development.*
 - *The identification of the time period when sites are likely to come forward for delivery is based on an assessment of the site at the time the SHLAA was undertaken. In practice, circumstances or assumptions may change which could mean that sites could come forward sooner or later than envisaged.*
 - *The commentary that accompanies the individual site appraisals is based on the information available at the time of the assessment. As such there may be additional constraints that were not identified as part of the initial assessment or it may emerge that some of the identified constraints no longer apply once a site is subject to more detailed assessment.*
- 1.6 The land included in the SHLAA forms the "baseline" potential housing land supply found within the existing urban area. It does not include the strategic allocations

which are being considered as part of PfE or any additional sites which would involve Green Belt release.

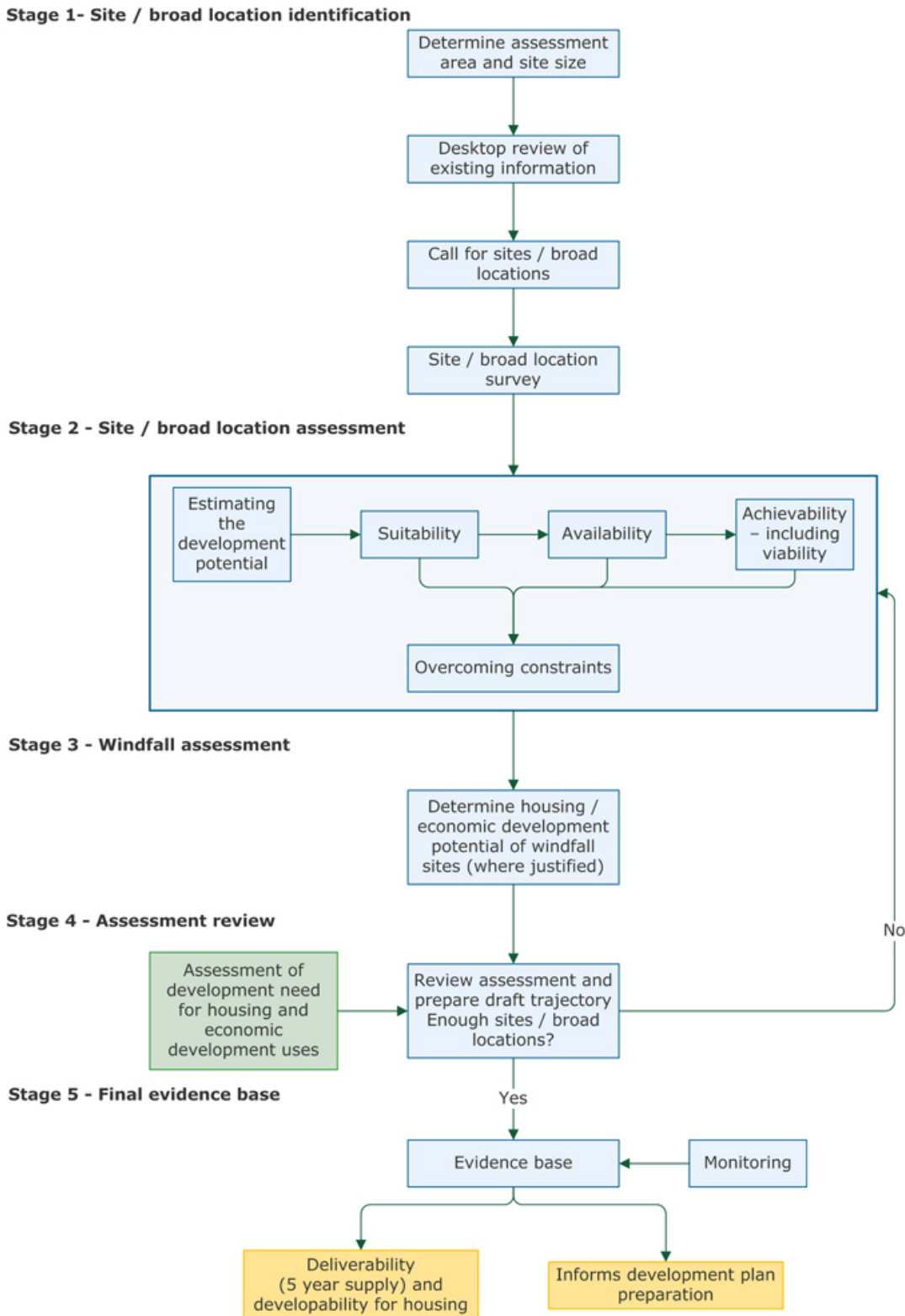
Strategic Environmental Assessment (SEA)

- 1.7 As the SHLAA does not allocate land or include policy on development, it will not directly create any potential environmental effects and would not be subject to SEA. Any sites considered for allocation as part of the Local Plan would be assessed as appropriate.

2 SHLAA Methodology

- 2.1 The SHLAA methodology has followed the stages set out in National Planning Practice Guidance (NPPG) note on Land Availability Assessments (updated in July 2019) by MCHLG, which sets out the core outputs and process requirements for the assessment. The process is shown in the flow diagram overleaf:

Figure 1: Stages in the SHLAA methodology, taken from NPPG Housing and Economic Land Availability Assessment



2.2 NPPG recommends that a call for sites is undertaken as part of the SHLAA process and the (previous) GMSF consultations included a GM-wide call for sites where local residents, businesses, landowners and developers were invited to submit details of sites that they thought could be suitable for housing or economic development. In addition, alongside the publication of the previous SHLAA (as at 1

April 2020) there was a Call for Sites online form set up for the public to submit sites for consideration. Alongside the sites identified through other sources, the results of this open Call for Sites process will contribute to the range of the sites and broad locations that are considered in the SHLAA when it is reviewed and where appropriate.

- 2.3 The guidance recommends the use of a standard process in order to create a robust assessment of land availability, helping to ensure a consistent and thorough review is undertaken. It states that the assessment should:
- Identify sites and broad locations with potential for development; assess their development potential; and assess their suitability for development and the likelihood of development coming forward (the availability and achievability);
 - Set out the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
 - Provide an indicative trajectory of anticipated development and consideration of associated risks.
- 2.4 The stages in the process included:
- a) Identifying sites and broad locations for consideration*
As well as call for sites submissions, a range of other sources were used, including planning application records, previous SHLAAs, mill survey and other employment land records, Council asset data, vacant land registers and regeneration proposals/masterplans;
- b) Site / broad location assessment*
This assessed the suitability, availability and achievability of sites and looked at issues such as policy and physical constraints, potential ownership constraints and availability of land (e.g. whether the site was being marketed for sale) and viability issues.
- 2.5 Assessing the suitability, availability and achievability (including the economic viability of a site) provides the information as to whether a site can be considered deliverable or developable. NPPF defines these terms as follows:
- To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable, does not involve major development if there is no planning application or clear evidence that homes will be delivered on this period. These are the sites that will form the five-year housing land supply;
 - To be considered developable, sites should be in a suitable location for development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. These are the sites that may form part of the post-five-year housing land supply.
- 2.6 An important difference in these definitions from the previous version of the NPPF is that guidance on the sites to be included in the five-year supply has changed. Previously, there has been an assumption that all sites with an outline permission or which were allocated for housing in the Local Plan (specifically Phase 1 housing

allocations) were deliverable in the first five years. The new NPPF now states that “Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”. Therefore, some allocated sites and some with outline permission no longer form part of the five-year supply and have been moved into the post five-year supply. Whilst this does not affect the overall supply, it means that the five-year supply is reduced further.

3 SHLAA Findings

- 3.1 The SHLAA assessment helped to determine whether a site should be included in the housing land supply and when it was likely that it would come forward for development. The outcome of the assessment is summarised in the table below which shows the overall housing land supply, including those within the five and post five-year periods:

Table 1: Summary of housing land supply identified in SHLAA (1 April 2021)

SHLAA category	Total Additions 2021-2026	Total Additions 2026-2031	Years 11+	Total Additions - all periods
Sites under construction	1,056	0	0	1056
Sites with extant planning permission	718	344	44	1106
Saved UDP Phase 1 housing allocations	15	360	0	375
Saved UDP Phase 2 housing allocations	52	253	0	305
Lapsed and Stalled sites >5 dwellings	106	486	337	929
Potential sites	946	3116	2993	7055
SUBTOTAL	2,893	4,559	3,374	10,826
Current small sites allowance minus any small sites already identified in supply*	0	375	450	825
Current clearance allowance*	187	25	35	247
TOTAL	2706	4909	3789	11404

- 3.2 The ‘Total Additions – all periods’ presents the total housing land supply that has been identified from 1 April 2021 to the long term. This is different to plan period of PfE and that proposed in the emerging Local Plan review which are up to 2037.
- 3.5 Of the housing land supply identified in years 11+, 308 homes have been identified as being deliverable post plan period (post 2037).
- 3.6 Homes identified as being deliverable in the post plan period are not included in the local housing need calculations for the plan period of PfE or Local Plan. They are however, identified in the SHLAA as per planning practice guidance which sets out that where possible housing land should be identified for years 11+ and beyond.

- 3.7 Table 2 identifies the housing land supply identified in the SHLAA within the plan period of 2021-2037. Clearance and small sites allowances only apply to the plan period, therefore years beyond 2037, as included in Table 1, do not apply any allowances.

Table 2: Summary of housing land supply identified in SHLAA (as at 1 April 2021) for 2021-2037

SHLAA category	Total Additions 2021-2026	Total Additions 2026-2031	Years 11+ 2031-2037	Total Additions - all periods
Sites under construction	1,056	0	0	1,056
Sites with extant planning permission	718	344	44	1,106
Saved UDP Phase 1 housing allocations	15	360	0	375
Saved UDP Phase 2 housing allocations	52	253	0	305
Lapsed and Stalled sites >5 dwellings	106	486	337	929
Potential sites	946	3116	2685	6,747
SUBTOTAL	2,893	4,559	3,066	10,518
Current small sites allowance minus any small sites already identified in supply*	0	375	450	825
Current clearance allowance*	187	25	35	247
TOTAL	2706	4909	3481	11096

Clearance Allowance

- 3.6 In previous years clearance allowance (an allowance for the loss or demolition of dwellings/ conversion of dwellings to non-dwellings) has been identified based on the average of the previous 5 years losses of dwellings to non-dwellings/ demolitions.
- 3.7 In previous years clearance allowance (an allowance for the loss or demolition of dwellings/ conversion of dwellings to non-dwellings) has been identified based on the average of the previous five years losses of dwellings to non-dwellings/ demolitions. As was the case in the SHLAA as at 1 April 2020, for 2021-2026 as well as the average annual clearance allowance calculated as set out above – minus 5 dwellings per year – an additional clearance allowance has been included to account for the large-scale demolition and redevelopment of Crossbank and Summervale House, Vale Drive, Oldham (site reference SHA2130). The redevelopment of this site will provide 88 homes (as approved as part of the planning permission June 2021), which is a net loss of 162 homes across the site compared to the previous site capacity (250 homes). In the SHLAA as at 1 April 2020 it was reported the net loss of the site would be 138 homes, however a slightly reduced site capacity has since received planning permission (June 2021) impacting the net loss and the clearance allowance for this period.
- 3.8 As a result, the 162 homes lost through the redevelopment of this site have been added to the annual clearance allowance for the first 5 years (2021-2026), resulting

in a clearance allowance of minus 187 homes for the first five years and minus 5 homes per year thereafter up to 2037.

Land supply categories

3.9 The following provides a brief explanation of the different categories included in the overall land supply:

a) Sites under construction

Sites that have received planning permission and this permission has been implemented i.e. a material start has been made on the development of the site. The capacity figure quoted in this category is the remaining number of dwellings yet to be completed as at 31 March 2021.

b) Sites with an Extant Planning Permission

Sites that had an extant (current) full or outline planning permission for residential development (including mixed use sites), as at 31 March 2021.

c) Saved UDP Housing Allocations

Sites that have been specifically allocated for residential development within the adopted Oldham Local Plan and which have yet to be developed. These sites were saved allocations from the previously adopted Unitary Development Plan (UDP) and are split into Phase 1 and Phase 2. The phasing arrangements previously identified when the sites were considered deliverable, however due to the housing land supply position outlined in this report, the phasing arrangements no longer apply.

d) Lapsed and stalled sites

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

e) Potential Sites

Sites that have been identified as being suitable for housing in the future but do not yet have residential planning history (i.e. have not previously received permission for housing or are not allocated for residential use).

Sites included in the potential category have been identified from the following sources:

- Sites submitted for consideration by residents, landowners and developers through the (previous) GMSF and local Call for Sites processes;

- Sites identified through masterplans, development briefs and renewal programmes where additional capacity or newly available land may emerge as part of wider redevelopment plans;
- Council's asset register - sites which are being considered for disposal have been assessed for their development potential;
- Review of existing employment land, including mills – to identify any underused and/or poor quality, poorly performing employment sites which are either known to be relocating or where circumstances suggest that residential development is likely to be achievable in future e.g. where residential development has recently been approved or developed adjacent to the site or where the current use of the site is no longer appropriate within the wider area (such as large mills served by HGVs located in narrow residential streets);
- Sites identified for redevelopment by Regeneration section;
- Sites suggested by Officer and Member workshops; and
- Site survey work undertaken by officers identifying potential urban infill and expansion.

f) Discounted sites

The SHLAA has attempted to identify as wide a range as possible of sites and broad locations for consideration. The “discounted” sites are currently constrained for housing, either because of physical or planning policy restrictions or are otherwise considered unsuitable, unavailable or unachievable. These sites have been sub-divided into several categories depending on the reasons for discounting, for example if they are in active employment use or are in the Green Belt. It should be noted that just because a site appears within the discounted site list this does not preclude it from coming forward in the future if it is considered suitable at that time. This has been reviewed and updated from last year, although for many of the sites they remain included on the discounted list. This is reviewed each year for any new evidence affecting a sites position.

4 Five-year housing land supply position

- 4.1 A great deal of emphasis is placed on the five-year deliverable housing land supply. The council is required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement or local housing need. The local housing need will be calculated based on the government's standard methodology as set out within paragraph 74 of the NPPF.
- 4.2 If a five-year supply cannot be demonstrated, or where the Housing Delivery Test¹ indicates delivery of housing has been substantially below the requirement, then it

¹The Housing Delivery Test will measure each local authority's performance in delivering new houses, expressed as a percentage of the total net homes delivered against the total number of homes required over the previous three years. If the Housing Delivery Test shows that there has been significant under delivery of housing over the previous three years (in this context meaning less than 85%), the local authority must include a 20% buffer in its supply of specific deliverable sites in order to achieve the required five years supply.

will become increasingly difficult to manage the location of development as the presumption in favour of sustainable development will apply to any planning application for housing.

- 4.3 Following consultation in 2018 on changes to the methodology, the Government has confirmed that the 2014-based household projections will continue to provide the demographic baseline for assessment of local housing need, rather than the latest 2016-based household projections. This baseline is then adjusted for affordability. Adjusted affordability ratios were published in March 2021 which changed Oldham's local housing need to 683 new homes per year.
- 4.4 Based on the identified supply, set out above, it is not possible to identify a five-year supply of deliverable housing land against the current housing requirement (standard methodology), at this present time.
- 4.5 In addition to the local housing need of 683, projected clearance for the first five years (187 homes to be cleared over this period made up of net clearance of 162 homes at Cross Bank House and annual projected clearance allowance of 5 homes per year) means that the identified five-year supply contains 709 fewer dwellings than the level of housing required for this period (3,415 homes), which represents a 3.9 year supply of deliverable housing land or 79% of the housing required for this period.
- 4.6 Due to the lack of an identified five-year deliverable housing land supply it has not been possible to provide a buffer of the additional 20% housing requirement set out in the NPPF and required as a result of the latest Housing Delivery Test measurement, to account for under-delivery of housing. If a buffer were to be applied this would produce an annual housing requirement for Oldham of 820 new homes per year, which when compared to the annual completion average (over the last 5 years) of 415 dwellings, is considered unattainable at this present time.
- 4.7 Places for Everyone (PfE) (2021) sets out an average housing requirement for Oldham of 680 new homes per year, based on a stepped housing requirement of 352 homes per year in the first five years (2021-2025); 680 homes per year in years 6-10 (2025-2030); and 868 homes in years 11-17 (2030-2037). The proposed requirement allows us to provide a lower number of homes for the first five years, which then steps up every five years thereafter in line with identified supply. This is beneficial as it allows time for identified large-scale sites to come forward with the required infrastructure.
- 4.8 Based on the proposed stepped requirement, the five-year supply (2,706 homes) identifies just less than the required total for this period (2,955 homes) at 98%, including a 20% buffer to account for under-delivery as is required as per the most recent HDT measurement (January 2021).
- 4.9 However, formally our housing delivery (as is measured in the HDT) will still be measured against our local housing need of 683 as per the standard methodology. As such, housing delivery remains important and we must prepare in advance to deal with the possible consequences, including reviewing and actioning the measures within the Housing Delivery Action Plan, published in August 2021, to increase housing supply and delivery in the borough.

5 Next Steps

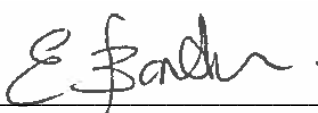
- 5.1 The updated SHLAA will continue the open Call for Sites process introduced in the previous SHLAA. We will invite members of the public, landowners, developers and other interested parties to submit sites for consideration as part of an on-going process. The SHLAA will then continue to be updated at least annually and any new site suggestions (and the existing baseline) will be assessed through these subsequent reviews.

Proposals:

To publish the SHLAA, as at 1 April 2021. A fully assessed SHLAA provides the evidence base for identifying sites to be included in the housing land supply and for other requirements such as the Brownfield Land Register. It means the council has a full understanding of its currently available land supply which helps to inform decisions on allocating land in the future and can be used by the development industry to identify land with potential for housing development within the borough.

Conclusions:

To approve and publish the SHLAA as at 1 April 2021 as a key piece of evidence base for the emerging Places for Everyone (PfE) and Oldham's Local Plan review and provide data for the Brownfield Land Register.

Signed:  Date: 16.12.2021
Emma Barton, Director of Economy

Signed:  16th December 2021
Cabinet Member for Housing