Oldham's Housing Delivery Action Plan: Part One

22 September 2022

Contents

1 Introduction

1.1 Purpose of the Report

1.1.1 This Action Plan provides an analysis of housing delivery across Oldham (contained in Part 1) and sets out the identified root causes for housing under-delivery within Oldham. Part 2 (which is contained in a separate document) sets out how the council intends to improve delivery (contained in Part 2), 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.

1.1.2 The Housing Delivery Test (HDT) has been introduced by the Government as a monitoring tool to demonstrate whether local areas are building enough homes to meet their housing need. The HDT measures net additional dwellings provided over the past three years against the homes required over the same period. Results on performance for each local planning authority in England are published annually.

1.1.3 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% - a 20% buffer of additional deliverable sites for housing on top of their existing five-year housing land supply must be identified.
- less than 75% - the presumption in favour of sustainable development must be applied.

1.1.4 Oldham's Local Plan[1] was adopted more than five years ago. In accordance with the Housing Delivery Test Rule Book,[2] the borough's HDT result is therefore calculated using homes delivered in the previous three years and the housing requirement (for those years) based on MHCLGs standard local housing need methodology.

1.1.5 The latest set of HDT results were published on 14 January 2022[3], by the Department for Levelling Up, Housing and Communities (DLUHC) using the previous three complete financial years of 2018/19, 2019/20 and 2020/2021 The results for Oldham are shown in the table below.

[1] Joint Core Strategy and Development Management Policies Development Plan (adopted 2011), available at: https://www.oldham.gov.uk/homepage/913/adopted_plans_and_guidance

[2] Housing Delivery Test Rule Book, available at https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book

[3] HDT Results 2021, published 14 January 2022, available at: https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement

Table 1: Housing Delivery Test: 2021 Measurement (published January 2022)

	Total number of homes required (2018-2021)	**Total number of homes delivered (2018-2021)**	**Housing Delivery Test: 2021 measurement**	**Housing Delivery Test 2021 consequence**
Oldham	1811*	1,645	91%	Action Plan

1.1.6 The number of homes required in 2018/19 was 717. The number of homes required in 2019/120 was 633. The number of homes required in 2020/21 was 461. Therefore, the total number of homes required for 2018-2021 was 1811 homes.

1.1.7 The Covid-19 global pandemic was an unprecedented event with many challenges including temporary disruption to local planning authority planning services and the construction sector. In response to these challenges, adjustments have been made with a one-month reduction to the 2019/20-year housing requirement and a four-month reduction to the 2020/21-year housing requirement. The thresholds for consequences for under-delivery have been maintained, as set out in NPPF (see paragraph 1.1.3 above). Further information is contained in the Written Ministerial Statement issued on 6 September 2021[4] .

1.1.8 Oldham Council has delivered 91% against the HDT requirement. This is an improvement from the HDT 2020 Measurement result of 80%. This means that the council is no longer required to provide a 20% buffer. However, as housing delivery was less than 95% of the housing requirement, an action plan needs to be maintained to assess the cause of under-delivery and identify actions to increase delivery in future years.

1.1.9 Based on the identified five-year housing land supply and local housing need over the next five years, Oldham is unable to identify a five-year supply of housing land. Consequently, the 'presumption in favour of sustainable development' as set out in National Planning Policy Framework (NPPF), would still apply. This is based on the latest position set out in the Strategic Housing Land Availability Assessment (SHLAA) as at 1 April 2021 and the standard housing methodology. The council is in the process of updating the housing land supply position, as at 1 April 2022, which will be published in due course as part of the annual update to the Monitoring Report and SHLAA. See section 3.8 for further information.

[4]Housing Update Ministerial Statement, September 2021, available at: https://questions-statements.parliament.uk/written-statements/detail/2021-09-06/hcws254

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

1.1.11 This is Oldham Council's third Action Plan, drawn up in response to the Housing Delivery Test: 2021 Measurement, published in January 2022, and providing an update to previous Action Plans.

1.2 Relationship to other Strategies and Plans

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

Oldham's Housing Strategy

1.2.2 The Council's Housing Strategy 2019[5] 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.

1.2.3 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.

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

- Building more homes to provide greater choice in type, size, tenure and affordability.
- Partnerships with committed developers and registered housing providers to build homes and better places.
- Improving the viability of difficult sites with developers.

[5] Oldham's Housing Strategy, Oldham Council 2019, available at: https://www.oldham.gov.uk/info/200584/housing_strategies_and_research

- 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.

1.2.5 These actions are supported by a delivery plan which will 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.

Creating a Better Place (Oldham Council)

1.2.6 'Creating a Better Place'[6] incorporates significant programmes of work that have been progressed to set out a comprehensive vision and strategic framework for the borough. 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.

1.2.7 This approach has the potential to deliver around 2,000 new homes in the town centre designed for a range of different budgets and needs, 1,000 new jobs and 100 new opportunities for apprenticeships, and is in alignment with Oldham Council's priority to be the Greenest Borough. The proposals go beyond numbers, however, with a focus on the significant contribution a quality housing offer makes to quality of life with access to local services, shops and open green space.

Oldham's Local Plan

1.2.8 The current Local Plan[7] was adopted in November 2011. This sets out a housing requirement of at least 289 dwellings a year (net of clearance) for the plan period.

1.2.9 As the Local Plan was adopted more than five years ago, the housing requirement figure has been superseded by central government's standard methodology for calculating local housing need.

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[6] 'Creating a Better Place', Oldham Council: https://www.oldham.gov.uk/news/article/1798/306_million_investment_strategy_set_to_be_approved_by_oldham_council

[7] Joint Core Strategy and DPD (adopted 2011), available at: https://www.oldham.gov.uk/homepage/913/adopted_plans_and_guidance

1.2.10 The council is in the process of reviewing the Local Plan. Consultation on the Regulation 18 Notification was carried out in August 2017. An eight-week consultation on the next stage - Issues and Options – took place from 5 June to 29 August 2021. Key issues that were raised during the consultation process are being fed into the Draft Plan and the accompanying topic papers. Further information is available on the council's website. Updates on the Local Plan timetable will be made available in due course on the council's website and as part of a revised Local Development Scheme[8].

'*Places for Everyone' Joint Development Plan Document*

1.2.11 Following the withdrawal of Stockport Council from the preparation of the Greater Manchester Plan for Jobs, Homes and the Environment (the Greater Manchester Spatial Framework (GMSF)) the remaining nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) chose to progress the Places for Everyone Joint Development Plan Document.

1.2.12 Places for Everyone (PfE) is the strategic spatial plan for the nine boroughs. It sets out how the nine districts should develop up until 2037 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.

1.2.13 Following extensive consultation from 9 August to 3 October 2021, the nine councils have submitted PfE to the Secretary of State for Levelling Up, Housing and Communities in February 2022 for independent examination.

[8] Local Development Scheme, available at:
https://www.oldham.gov.uk/info/200709/documents_in_the_local_development_framework/230/local_development_scheme

1.2.14 PfE sets out the housing requirement for each of the nine districts, derived using the standard Local Housing Need (LHN) methodology provided in the National Planning Practice Guidance (NPPG) with adjustment to take account of affordability. The 'Places for Homes' Chapter in PfE also identifies the housing land supply, the distribution of housing land, the phasing of new housing development, the affordability of new housing development, the type, size and design of new housing and identifies appropriate housing densities for development.

1.3 Approach and Methodology

1.3.1 The remainder of the Action Plan includes the following:

- Housing delivery and supply analysis (contained in Part 1);
- A summary of findings and key issues 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)

2 Housing Delivery Analysis

2.1 Local Housing Need

2.1.1 This section provides an analysis of housing need in the borough.

2.1.2 Oldham's current Local Housing Need (LHN) is based on central government's standard methodology. For Oldham, local housing need has recently changed from 693 to 683 homes per year. This is due to the publication of the most recent affordability ratios by the Office for National Statistics (ONS) in March 2021 and the subsequent adjustment this has made to local housing need as per the government's standard methodology (amended December 2020). The methodology continues to use the 2014-based household population projections, adjusted for affordability.

Table 2: Oldham's Local Housing Need compared to Local Plan targets

Housing Requirement	Number of dwellings
Local Plan requirement	289 new homes a year
2021 Local Housing Need (based on central government's standard methodology)	683 new homes a year
Difference between the Local Plan and the 2021 LHN	At least 394 additional new homes are required a year compared to the Local Plan requirement.

2.1.3 The figures in table 2 illustrate the scale of the challenge given the difference between our Local Plan requirement and the LHN (as published in January 2022 and applicable to this action plan).

2.1.4 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).

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

2.1.6 Following the publication of the affordability ratios in March 2022 Oldham's LHN has changed to 705 new homes a year (as per the standard methodology). However, for the purposes of this HDT Action Plan reference is made to the LHN in place at the time of the most recently published SHLAA – as at 1 April 2021, which was 683 new homes a year.

2.2 Housing Completions

2.2.1 The current Monitoring Report[9] was published in December 2021.

2.2.2 Over the last ten years (2011/12 – 2020/21), 3,751 (net) new homes have been completed. This represents an average of 375 homes per year. The number of net completions has fluctuated over the last ten years. After falling in 2015/16, completions increased again from 2016/17 as a number of 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.

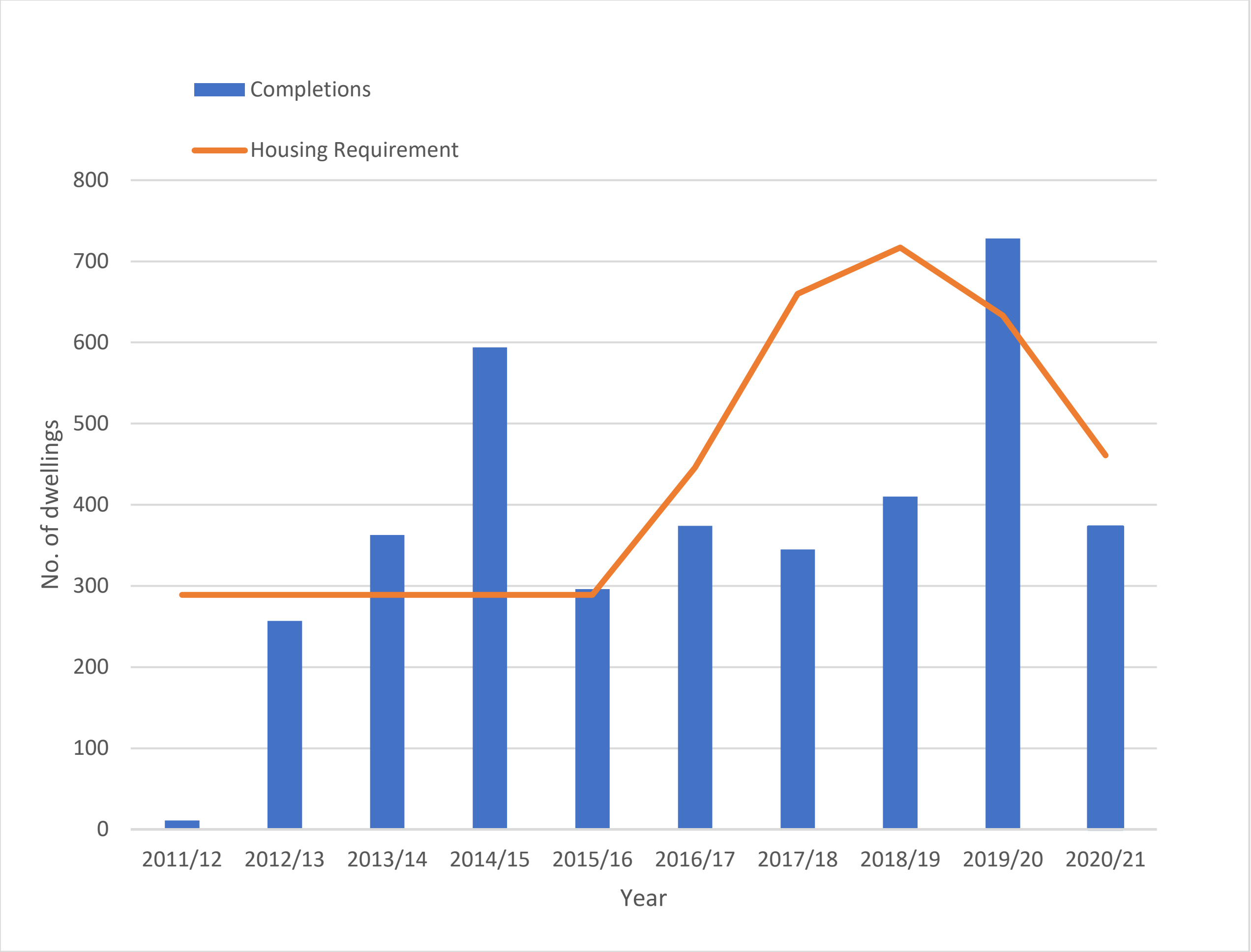
2.2.3 Completions for 2020/21 (373 homes) were significantly lower than 2019/20 (728 homes). It is likely that the impact of the Covid-19 pandemic and wider socio-economic issues may have contributed to the lower level of completions. However, on average over the last nine years (2012/13 to 2020/21) completions have improved, with an average of 415 dwellings being completed annually.

2.2.4 As illustrated in figure 1, this is 900 homes less than the housing requirement[10] for the same period (4,651 homes). Out of those 10 years, the number of net completions has exceeded the housing requirement (for the given year) four times.

[9] Oldham's Monitoring Report and Infrastructure Funding Statements 2020 to 2021, available at:https://www.oldham.gov.uk/info/200709/documents_in_the_local_development_framework/263/annual_monitoring_report

[10] The requirement is based on that identified in Oldham's Joint Core Strategy and Development Management Development Plan Document (the Local Plan) for the period 2008/09 to 2014/15 and then the requirement identified through the Housing Delivery Test measurement for the period 2015/16 to 2019/20.

Figure 1: Net Completions 2011/12 to 2020/21

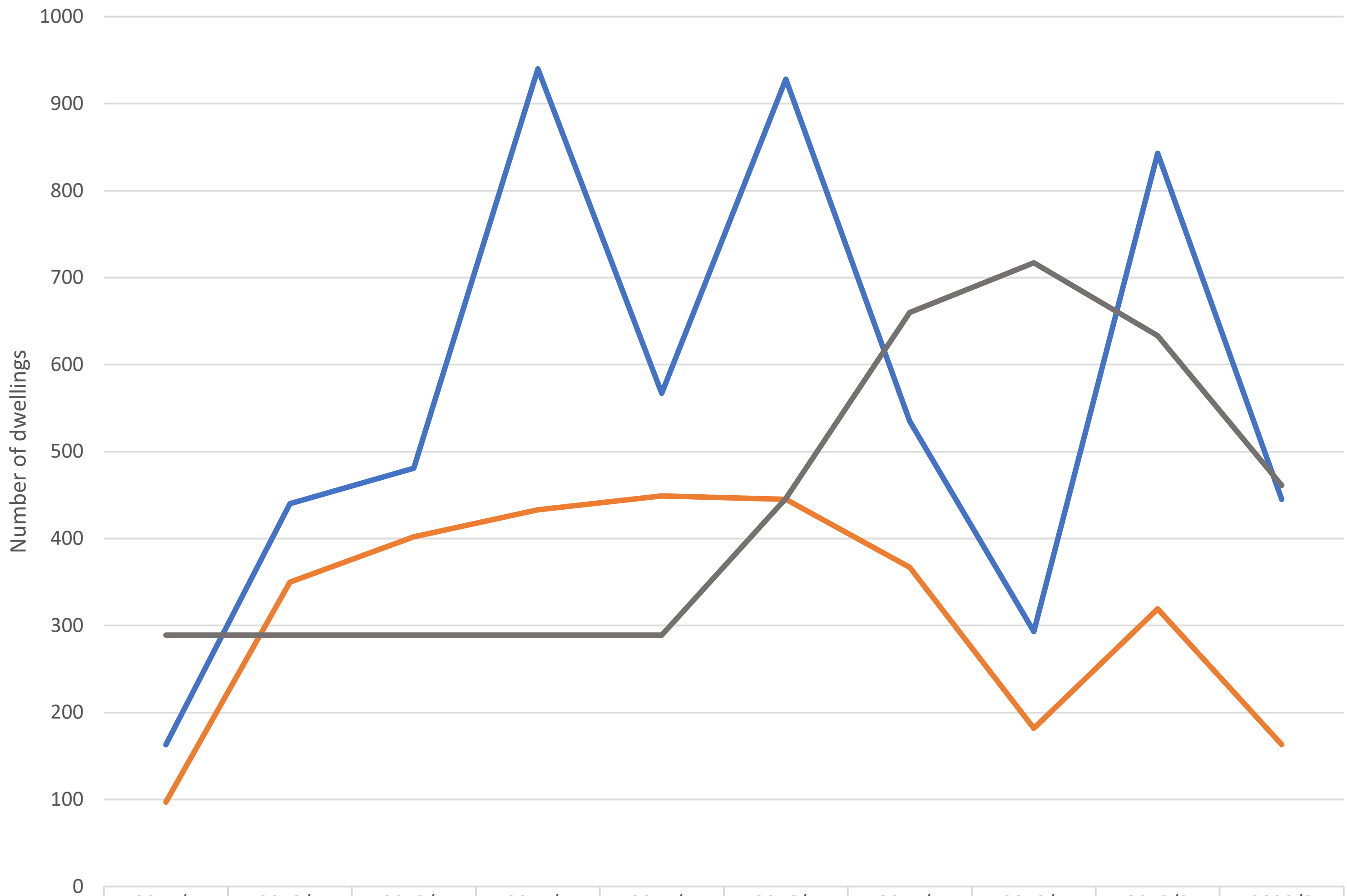


2.3 Implementation of Planning Permissions

2.3.1 Figure 2 shows the rate of delivery compared to the number of homes granted planning permission each year over the last eleven years (since the adoption of the Local Plan) against the requirement set out in the Local Plan and, more recently, the HDT requirement. This has fluctuated over time and shows that:

- with the exception of two years (2011/12 and 2012/13) the number of new homes granted permission has far exceeded the 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 HDT requirement for those years; and
- during 2019/20 the number of new homes granted permission far exceeded the HDT requirement for that year, whilst during 2020/21 it was only 16 homes less.

Figure 2: Residential permissions compared to completions 2011/12 to 2020/21



	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
Capacity of sites granted planning permission	163	440	481	940	567	928	535	293	843	445
No. of dwellings completed on these sites	97	350	402	433	449	445	367	182	319	163
Housing Requirement	289	289	289	289	289	446	660	717	633	461

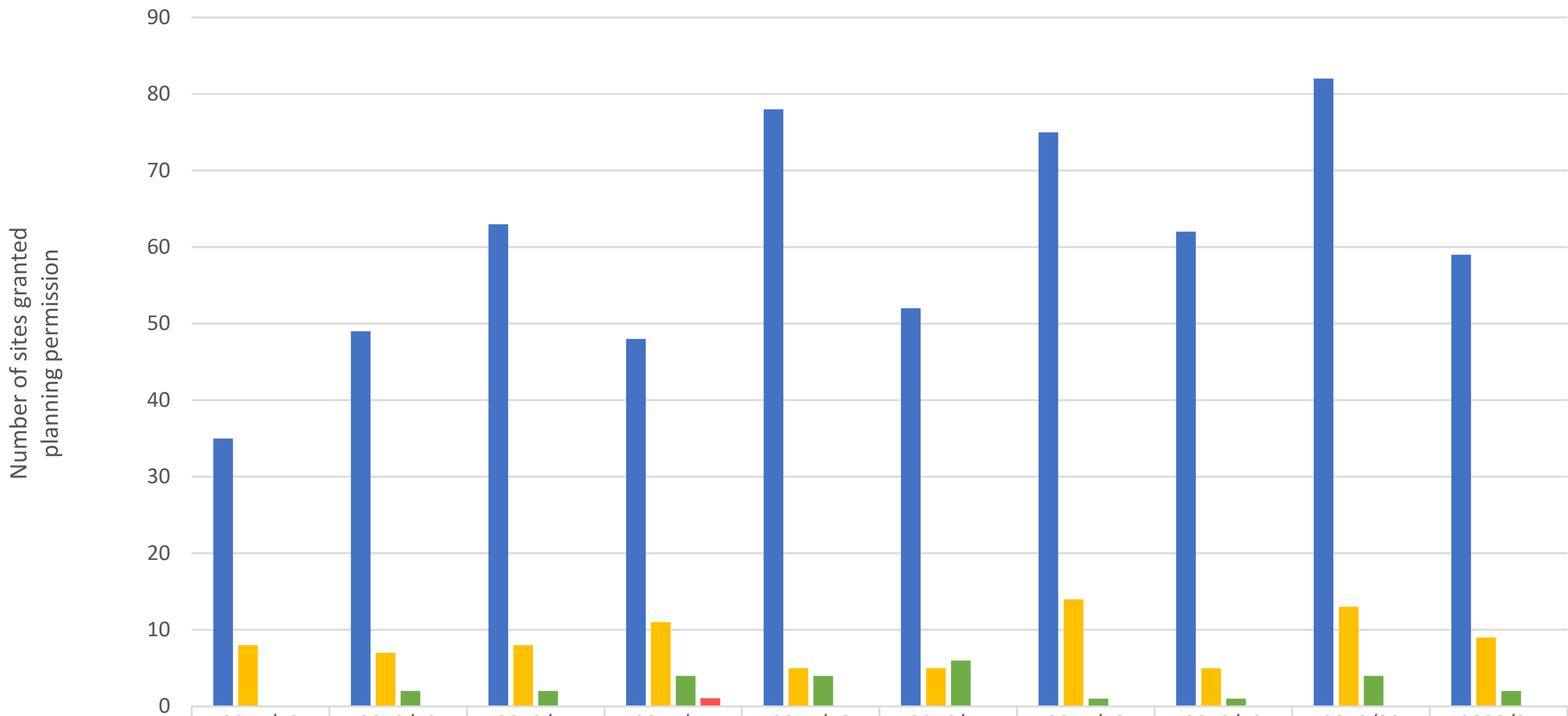
2.3.2 Over the period, approximately 782 sites have been granted planning permission, generating a potential yield of 6,389 homes. Just over half (3,758 homes or 59%) have been completed, although it must be borne in mind that 237 sites (or 1,581 homes) were only granted permission in the last three years. As such, there is still time for these to come forward.

2.3.3 Further analysis of the sites that have been granted permission for housing in the last eleven years and the progress of these sites shows that over this period an average of 16% have lapsed, meaning an equivalent of 831 homes cannot come forward unless a fresh application is submitted and granted. On average, every year since 2010/11 92 homes granted planning permission are not commenced.

Size of sites coming forward

2.3.4 Analysis of 'minor' and 'major' residential development sites, as defined by NPPF, shows that minor sites (of between 1 and 9 dwellings) make up 84% of the sites granted planning permission in the last 11 years. Major sites (of more than 10 dwellings) make up 16%. Figure 3 illustrates this.

Figure 3: Number of sites with planning permission by site size 2011/12 to 2020/21



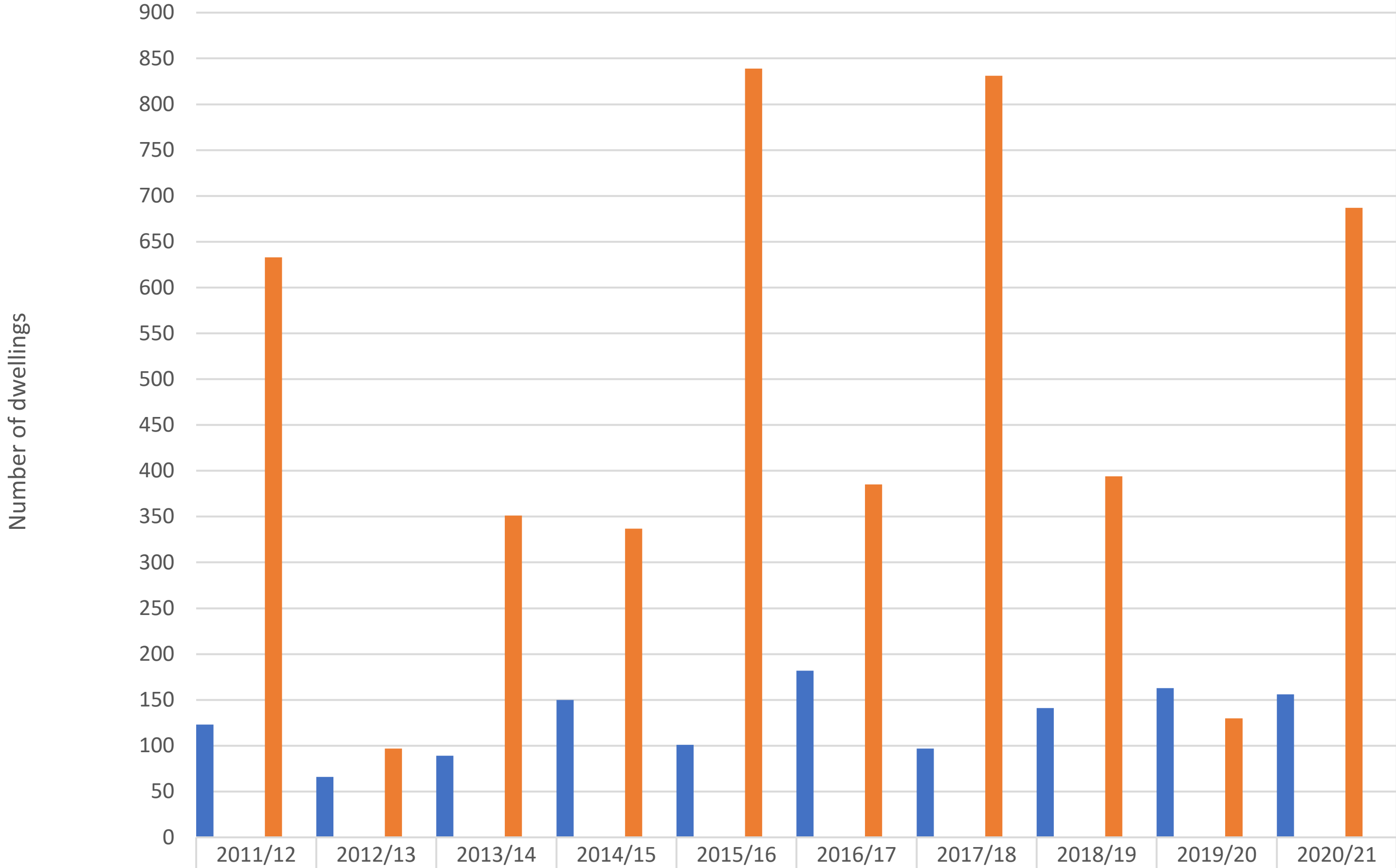
	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
Sites with less than 10 dwellings	35	49	63	48	78	52	75	62	82	59
Sites with 10 to 49 dwellings	8	7	8	11	5	5	14	5	13	9
Sites with 50 to 199 dwellings	0	2	2	4	4	6	1	1	4	2
Sites with 200+ dwellings	0	0	0	1	0	0	0	0	0	0

Years

2.3.5 Despite the above, figure 4 shows that 74% of the total number of homes granted planning permission over the last 11 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.

2.3.6 More detailed analysis shows that 14% of dwellings granted permission on major sites have expired, which is a slightly lower lapse rate than the overall supply (16%). This includes three sites of over 50 dwellings, with a capacity for 315 new homes, where planning permission has expired without implementation. Further details regarding this can be found in Appendix 1.

Figure 4: Number of dwellings with planning permission by site size 2011/12 to 2020/21



	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
No. of dwellings granted permission on minor sites	123	66	89	150	101	182	97	141	163	156
Percentage of dwellings on minor sites	16%	40%	20%	31%	11%	32%	10%	26%	56%	19%
No. of dwellings granted permission on major sites	633	97	351	337	839	385	831	394	130	687
Percentage of dwellings on major sites	84%	60%	80%	70%	89%	68%	90%	74%	44%	81%

Build-out Rates

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

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

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

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

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

Table 3: 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+	3-22	20	37	28	68
50-99	1-35	8	32	25	51
20-49	1-35	11	27	16	21
10-19	1-35	12	30	20	7
6-9	1-41	15	38	23	5
0-5	1-48	11	27	18	1

3 Housing Land Supply Analysis

3.1 Housing Land Supply

3.1.1 Analysis within this section is based on the housing land supply as of 1 April 2021 as identified in the council's SHLAA[11] and Monitoring Report[12].

3.1.2 The SHLAA (as of 1 April 2021) identifies a baseline housing land supply of 10,826 homes. This increases to 11,404 homes when taking into account the small sites and clearance allowances. A breakdown of the housing land supply as of 1 April 2021 is shown in table 4.

3.1.3 Table 4 shows that 65% of the existing housing land supply is on potential housing sites. This means that 35% of the supply is on sites within the planning system. This includes those that are under construction, have planning permission (outline and full), existing housing allocations, and where planning permission has lapsed, or development has stalled.

[11] Strategic Housing Land Availability Assessment (SHLAA) (as at 1 April 2021), available at:https://www.oldham.gov.uk/info/200709/documents_in_the_local_plan/2134/strategic_housing_land_availability_assessment

[12] Oldham's Monitoring Report and Infrastructure Funding Statements 2020 to 2021, available at:https://www.oldham.gov.uk/info/200709/documents_in_the_local_development_framework/263/annual_monitoring_report

Table 4: Breakdown of the housing land supply as at 1 April 2021

SHLAA category	Total dwellings 2021-2026	Total dwellings 2026-2031	Total dwellings Years 11+	Total dwellings - all periods	% of supply (dwellings)	Total of number of sites	% of supply (sites)
Sites under construction	1,056	0	0	1,056	10	133	30
Sites with extant planning permission	718	344	44	1,106	10	156	35
Saved UDP Phase 1 housing allocations	15	360	0	375	3	9	2
Saved UDP Phase 2 housing allocations	52	253	0	305	3	6	1
Lapsed and Stalled sites >5 dwellings	106	486	337	929	9	38	8
Potential sites	946	3,116	2,993	7,055	65	108	24
SUBTOTAL	*2,893*	*4,559*	*3,374*	*10,826*	100	450	100
Current small sites allowance minus any small sites already identified in supply	0	375	450	825			
Current clearance allowance	-187	-25	-35	-247			
TOTAL	**2,706**	**4,909**	**3,789**	**11,404**			

3.2 Current Position of Housing Allocations

3.2.1 UDP Phase 1 and Phase 2 Housing Allocations have been saved as part of the Local Plan through Policy 3 'An Address of Choice' with the intention being at the time that these would be assessed as part of the preceding Site Allocations Development Plan Document (DPD). However, progress regarding the Site Allocations DPD was put on hold in light of the GMSF (now Places for Everyone). Going forward allocations will be considered as part of the emerging Local Plan review (in addition to those strategic allocations identified as part of Places for Everyone).

3.2.2 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 due to the current housing land supply position.

3.2.3 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)[13] and Huddersfield Road / Dunkerley Street (M4);
- One site has been constrained due to its listed building status (Bailey Mill H1.1.5);
- 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.

3.2.4 Hartford Mill (H1.1.27) was de-listed and 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.

[13] Oldham Road/ Hardman Street (M3) received planning permission for residential development of 14 dwellings in January 2022. As permission was granted after the base period of the SHLAA as at 1 April 2021, the site's status remains as undeveloped in the SHLAA as at 1 April 2021, however it will be updated in the next SHLAA update (as at 1 April 2022) as appropriate.

3.2.5 For the remaining phase 1 allocations, it would appear, therefore, that there are issues preventing these sites from coming forward, whether it be site constraints relating to their listed status, current use and multiple ownerships or viability.

3.2.6 In terms of the phase 2 housing allocations, six out of the eight allocations remain with a capacity of 305 dwellings in total. Planning permission has been granted subject to a legal agreement for 265 dwellings[14] in total on Land at Knowls Lane (H1.2.10) (approximately 121 dwellings on the housing allocation) and three dwellings at Ashton Road, Woodhouses (H1.2.3), albeit not for the full indicative capacity identified as part of the housing allocation.

3.3 Lapsed and Stalled Sites

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

3.3.2 In the lapsed and stalled category there are 25 sites of 10 dwellings or more, with the capacity to provide 929 dwellings. Six of these sites have a capacity of between 50 to 199 dwellings. These are listed in table 5 below. There are no sites of 200+ dwellings.

Table 5: Lapsed and stalled sites with a capacity of 50 dwellings and above, as at 1 April 2021

Site name	Land Type	Area (ha)	Dwellings
53 - 55 King Street (formerly Riley Snooker Club and Megson and Ponsonby Solicitors), Oldham, OL8 1EU	BF	0.15	126
Thornham Mill, Oozewood Road, Royton, OL2 5SJ	BF	0.41	71
Phoenix Mill, Cheetham Street, Failsworth, Manchester, M35 9DS	BF	1.46	89
Land at North Werneth Zone 5, Land bounded by Hartford Mill to the west, Edward Street to the north, and Milne Street to the east.	BF	1.39	72
Land at Derker (Abbotsford Road Site), Abbotsford	BF	1.18	96

[14] A reserved matters application which amends the site capacity to 234 dwellings was granted in July 2022.

Site name	Land Type	Area (ha)	Dwellings
Road/ Vulcan Street, Derker, Oldham			
Former Springhead Quarry, Cooper Street, Springhead, Oldham	BF	1.95	55

3.3.3 Planning permission has been granted for 60 dwellings on the Thornham Mill site after the monitoring period in June 2022. A planning application which includes land at Former Springhead Quarry, Cooper Street, has also been submitted and is pending decision (as at July 2022).

3.3.4 Since the previous HDT Action Plan, published in 2021, a number of formerly large-scale lapsed and stalled sites have commenced including, Land off Wellyhole Street (54 dwellings) and Land at North Werneth Zone 4, bounded by Suthers Street, Edward Street and the railway line (36 dwellings). One site with lapsed planning permission (Money Controls Ltd, New Coin Street - 139 dwellings) has been discounted from the housing land supply as part of the updated SHLAA, as it is no longer considered suitable for residential development as there are known intentions of the landowner for the site to remain in employment use.

3.3.5 Several other lapsed and stalled sites have been assessed and amended as part of the SHLAA update, including amending site capacity based on updated constraints/ density assumptions and amending site boundaries to remove completed parts of sites, for example.

3.3.6 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 (one formerly vacant site in this area – Land at North Werneth Zone 4 – is already under construction for residential development, as set out above).

3.3.7 For these reasons, these sites are identified in the post five-year housing land supply as developable in years 6 to 10 and 11+ recognising the constraints that need to be overcome in order to secure their delivery.

3.4 Housing Land Supply by Land Use

3.4.1 A significant proportion of the housing land supply as at 1 April 2021 includes sites that are currently in other uses, such as employment, but there are reasons to assume that housing could be achievable on the site in future. 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 6 overleaf sets out the supply by land use.

Table 6: 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			7%	28%	6%	27%	11%	26%	10%	25%
Number of sites/ dwellings	450	10,826	32	2,991	26	2,876	48	2,833	47	2,798

3.4.2 Table 6 shows that 7% (32 sites) of the total number of sites in the housing land supply (450 sites) are in active employment use, which represents 28% (2,991 dwellings) of the total number of dwellings in the housing land supply (10,826 dwellings).

3.4.3 6% (26 sites) of the total number of sites in the housing land supply are on mill sites, which represents 27% (2,876 dwellings) of the total number of dwellings in the housing land supply. In addition, to the 32 sites in active employment use, some of these mills are also in active employment use.

3.4.4 11% (48 sites) of the total number of sites within the housing land supply are within Oldham Town Centre, representing 26% (2,833 dwellings) of the total number of dwellings in the housing land supply.

3.4.5 Finally, 10% (47 sites) of the total number of sites within the housing land supply are council-owned. This represents 25% (2,798 dwellings) of the total number of dwellings in the housing land supply.

3.4.6 For currently occupied sites, reasons which may make such a site suitable include:

- the site has been suggested as potential housing land through the Call for Sites process by the owner;
- it is within an existing 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.

3.5 Housing Land Supply by Type

3.5.1 Table 7 overleaf shows that 75% of all homes identified as part of the baseline housing land supply is on brownfield land. This does not include the brownfield element of 'mixed' sites, which are a mix of brownfield and greenfield land. A further 13% of the baseline housing land supply is on mixed sites. As such, 88% of the baseline housing land supply is on brownfield or mixed sites.

Table 7: Breakdown of Housing Land Supply as at 1 April 2021 by Land Type

Category	Brownfield	Greenfield	Mixed	Total
Sites under construction	712	213	131	1,056
Sites with extant planning permission	380	347	379	1,106
Saved UDP Phase 1 housing allocations	375	0	0	375
Saved UDP Phase 2 housing allocations	0	305	0	305
Lapsed and stalled sites >5 dwellings	848	39	42	929
Potential sites	5837	348	870	7,055
Total	**8152**	**1254**	**1420**	**10,826**

3.5.2 83% of the new homes identified on potential sites and 91% 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 breadth of development opportunities across the borough.

3.6 Housing Land Supply by Size

3.6.1 Analysis of the housing land supply as at 1 April 2021 by site size shows that 47% of the supply is made of sites with a capacity to deliver between 50 to 199 dwellings and 27% on large-scale major sites (capacity of 200+). 20% of the supply is on sites with a capacity of 10 to 49 dwellings and 6% on minor sites with a capacity to deliver less than 10 dwellings.

3.6.2 Compared to the housing land supply for 2018, 2019, and 2020, the SHLAA update for 2021 has found additional large-scale sites (200+dwellings), with the capacity to deliver around 940 more dwellings than the sites of that size identified in 2018. Furthermore, the baseline housing land supply as at 1 April 2021 contains 10 sites with a capacity of 200+, compared to the 2018 housing land supply which included 6 sites with a capacity of 200+.

3.6.3 The large-scale major sites include six key sites within Oldham Town Centre and which form part of the council’s regeneration plans for the area:

- Civic Centre, West Street with an indicative capacity of 480 homes;
- Land at Regent Street, Wallshaw Street & Bell Street with an indicative capacity of 332 homes:

- Mecca Bingo Block, Corner Union/ King Street with an indicative capacity of 275 homes;
- Tommyfield Market Site with an indicative capacity of 244 homes;
- Land at Southlink with an indicative capacity of 237 homes; and
- Alliance and Britannia Mill Triangle, Spencer Street with an indicative capacity of 224 homes.

3.6.4 Further work has been carried out as part of the 'Creating a Better Place' framework to identify residential development opportunities on a number of council-owned sites within Oldham Town Centre. The work has identified potential capacity options, design parameters and green infrastructure opportunities to deliver residential and mixed-use development on a number of key sites. This work and the addition of the sites already identified within the SHLAA, have increased the number of homes identified as part of the housing land supply within Oldham Town Centre to around 2,382 homes.

3.6.5 75% of the potential sites identified as part of the housing land supply are on brownfield land. This has decreased from the last action plan, which reported that 80% of the potential sites identified as part of the housing land supply were on brownfield land.

3.6.6 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, some capacity even falling post-plan period (post-2037). As such, there is still a need to identify opportunities to bring large sites forward sooner.

3.7 Housing Land Supply by Owner

3.7.1 As table 8 shows 25% 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 the opportunity for new ways of partnership working to bring these sites forward.

3.7.2 There is also a proportion of sites owned by other public bodies providing the opportunity for partnership working and also sites owned by Registered Affordable Housing Providers enabling the delivery of new affordable homes .

Table 8: Breakdown of housing land supply as at 1 April 2021 by landowner

	Local authority	Registered Provider	Other public body	Private	Mixed	Total
Sites under construction	169	0	0	887	0	1,056
Sites with extant planning permission	160	0	0	908	38	1,106
Saved UDP Phase 1 housing allocations	15	0	0	202	158	375
Saved UDP Phase 2 housing allocations	78	0	0	227	0	305
Lapsed and stalled sites >5 dwellings	15	0	0	818	96	929
Potential sites	2,226	490	200	3,682	457	7,055
Total	2,663	490	200	6,724	749	10,826

3.8 Five-year Housing Land Supply Position

3.8.1 The SHLAA as at 1 April 2021 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.

3.8.2 Based on the DLUHC standard methodology, Oldham's local housing need in place at the time of the publication of the SHLAA as at 1 April 2021 was for 683 homes per year[15]. The standard methodology housing requirement represents a significant increase on the adopted local plan requirements of 289 homes per year. Whilst the SHLAA demonstrates that there is a sufficient amount of potential housing land currently available over the plan period (with the majority being brownfield), there is a need to identify further land to demonstrate a five-year supply of deliverable housing land against the standard methodology requirement. However, it should be recognised that housing delivery is increasing in the borough, as reflected in the latest HDT result of Oldham having delivered 91% of the housing required over the last three years.

[15] Following the publication of the affordability ratios in March 2022 Oldham's LHN has changed to 705 new homes a year (as per the standard methodology). However, for the purposes of this HDT Action Plan reference is made to the LHN in place at the time of the most recently published SHLAA – as at 1 April 2021, which was 683 new homes a year.

3.8.3 Places for Everyone proposes a stepped housing requirement for Oldham of 352 homes per year for years 1-5, 680 homes per year for years 6-10 and 868 homes per year for years 11+. The housing land supply identified in the SHLAA would be sufficient to meet the requirement for the first five years and the remainder of the plan period.

3.8.4 The five-year housing land supply position is updated annually and is published as part of the SHLAA and authorities Monitoring Report.

4 Engagement

4.1 Developer Forum

4.1.1 To inform the HDT Action Plan 2019 , a developers' forum was held on the 7th of May 2019 to which representatives from housebuilders, registered affordable housing providers and planning agents operating within the borough were invited. A summary of comments received as part of the 2019 Developers Forum is provided in Appendix Two.

4.1.2 The forum provided an opportunity to discuss and explore the key reasons for the under-delivery of housing and how these may be overcome. It was intended that forums would be held regularly to ensure engagement with housing delivery stakeholders is maintained, however, due to Covid-19 restrictions and other work pressures it was not possible to hold forums in 2020 and 2021. As such, to inform the preparation of the HDT Action Plan 2021 a housing delivery developer questionnaire was sent to attendees of the previous developer forum and other newly identified developers, housebuilders, registered providers and agents operating in the borough.

4.1.3 As part of the engagement carried out for previous 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 house delivery.

4.1.4 The questionnaire sought views and comments on housing delivery issues and opportunities in Oldham, and the current and anticipated impact of the Covid-19 pandemic on housing delivery and housing priorities.

4.1.5 In terms of how prolific housing delivery issues are in Oldham compared to other Greater Manchester authorities, the findings of the questionnaire 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. Furthermore, it was noted that generally low house prices 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. Appendix 3 contains a full summary of responses to the questionnaire.

4.1.6 The following actions/ improvements have been identified by respondents in relation to the housing delivery issues:

- Better resourcing of planning departments and statutory consultees (not limited to Oldham);
- Need to ensure a streamlined post-approval process to agreeing S106 and discharging planning conditions;

- Strict deadlines for agreeing S106;
- Ensure planning conditions are proportionate to the development;
- Could introduce deemed approval of conditions after a short amount of time following submission of information;
- Housing mix and type of developments need to be market-facing;
- Large scale masterplans should ensure the development has a positive impact on the surrounding area, increasing land values, investment and regeneration;
- Need for clear planning policy which ensures real choice in housing;
- Decision-making should consider the merits of the scheme rather than standard 'box ticking';
- Early communication during the application process around development expectations, issues, requirements and application timescales is essential; Early, open and efficient pre-application discussions with the council and infrastructure providers;
- Efficient validation and consultation processes;
- Application determination within an appropriate time period should be met; Sufficient pre-approval discussion could deal with issues and agree conditions; Need to identify a better way to address and communicate infrastructure concerns with the public; and
- Oldham's new local and regional plan needs to provide a clear vision for the borough's future and guide development.

4.1.7 Respondents also highlighted the impacts of Covid-19 on housing delivery, including:

- The closure of construction sites for several months in 2020 and the implications of Covid-19 restrictions / social distancing requirements have, in some cases, led to delays in site completions, including some affordable housing;
- Long term impact of people continuing to work from home may lead to a change in housing demand - for example, decreased demand for flats, increased demand for homes with office space, more garden space, better access to parks and open spaces; and
- The wider financial impact of the pandemic impacting on resources available to deliver affordable housing.

4.1.8 Given some of the potential longer term housing delivery impacts outlined above and the wider societal impact of the Covid-19 pandemic, the questionnaire sought views on whether developers' priorities for housing delivery have changed or are anticipated to change as a result. No major changes were highlighted by respondents, with most stating that delivering quality housing is still a priority.

4.1.9 Longer-term analysis is needed to understand the longer-term impacts of the Covid-19 pandemic on housing delivery and will be kept under review in future housing delivery action plans.

5 Summary of housing delivery and supply issues in Oldham

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

- The increase in housing requirement to 683 homes a year is a significant increase on our requirement set out in the Local Plan (289 homes a year) and will require a step change in housing delivery and supply.

- There is a need to continue to ensure that brownfield sites come forward for development - 75% of the housing land supply is on brownfield land, with a significant proportion (70% 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 68% of sites granted planning permission in the last eleven years. Whilst the number of major sites coming forward is relatively low, they continue to form a significant proportion of the supply, accounting for 77% of dwellings granted planning permission over the last eleven years. 'Major' sites in Oldham are still relatively small with the majority having a capacity of under 50 dwellings, however, the most recent update of the housing land supply (as at 1 April 2021) has identified additional 'large-scale major' sites (over 200 dwellings).

    - Number of major sites of 10 to 49 dwellings – 115

    - Number of major sites of 50 to 199 dwellings – 55

    - Number of large-scale major sites of 200+ dwellings – 10

- 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 small.

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

- Over-reliance on sites outside the planning system – with 65% of the housing land supply (as at 1 April 2021) made up of potential housing sites that do not currently have any planning status.

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

6 Appendices

6.1 Appendix 1 - Implementation rate by size of site

Implementation rates by size of site from 01/04/2011 to 31/03/2021

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
2011/12	45	163	97	18	1	0	46	28	289
2012/13	58	440	350	14	33	0	43	10	289
2013/14	75	481	402	10	8	0	53	11	289
2014/15	64	940	433	47	167	0	56	6	289
2015/16	87	567	449	35	10	0	69	12	289
2016/17	63	928	445	44	140	38	263	28	446
2017/18	90	535	367	45	36	0	88	16	660
2018/19	68	293	182	70	3	8	26	9	717
2019/20	99	843	319	61	26	383	n/a	n/a	633
2020/21	70	445	163	99	42	136	n/a	n/a	461
TOTAL	**719**	**5635**	**3207**	**443**	**466**	**565**	**644**	**15**	

6.2 Appendix 2 - Developer Forum 2019 Responses

6.2.1 The developer forum, hosted in 2019 to inform the previous action plan, identified several potential reasons for the under-delivery of housing and the actions that could address the issues. A summary is provided in the table below.

Main issue theme	Issues identified	Actions identified to address issues
Land supply and demand/ types of sites coming forward	Small sites (up to 50 dwellings) suffer from market and funding pressures more easily and can therefore be difficult to bring forward; Lack of large sites with the capacity for 100/200+ dwellings that are attractive to volume housebuilders. Lack of sites in appropriate and desirable locations; Concerns regarding the deliverability of the potential housing land supply – many have ownership issues, are contaminated or are in active employment use; Some sites, such as Hartford Mill, are holding back the development and viability of neighbouring sites due to their negative impact on the area.	Identify a range of deliverable and viable sites, including larger sites capable of delivering 100/200+ dwellings; Delivery of brownfield sites in terms of access to remediation grant and flexibility regarding S106 contributions for delivery of brownfield sites; Brownfield Register – the creation of a database with environmental surveys and better supporting information; Bringing stalled sites forward through, for example, advertising those sites that have planning approval but which have stalled.
Delivery	Lack of qualified labour in terms of construction and skills shortage; Supply chain for materials is under significant pressure and may be unable to cope with increased housing requirements; Rules and restrictions of funding opportunities; Developers expectations regarding the Council's flexibility	Better promotion and quicker release of Council owned land with greater clarity regarding planning requirements, including the use of developer agreements with a delivery plan rather than by auction (the latter giving less control regarding how and when sites will come forward); Exploring opportunities that may be available through the One Public Estate;

Main issue theme	**Issues identified**	**Actions identified to address issues**
	to dispose of land both directly and/or below market value.	Packaging sites together – like for like may be better (small and large require different approaches/funding etc) although doesn't need to be in the same area; Design and sustainable construction of new homes, including adaptability and lifetimes to allow homes to be extended, adapted as families grow and circumstances change, rather than moving.
Viability	Issues regarding bringing brownfield sites forward and the ability to meet requirements in relation to affordable housing, open space, supporting infrastructure, design and construction; Issues that impact on viability need to be set out and agreed upon at outline planning application stage; Gap funding is required to help bring sites forward.	Explore the use of different funding opportunities, such as joint venture partnerships; Town Centre gap funding – e.g. Oldham Housing Investment Fund; Housebuilders fund (use to address issues with small developments); advertise a range of funding options available to small, medium and large developers; encourage partnership working; and GM funding opportunities.
Wider Issues	Quality of place and neighbourhood in order to attract people to move into new houses; Town centres at present are not suitable for large-scale housing. Further investment is required and issues such as crime, anti-social behaviour and lack of facilities (beyond retail) need to be addressed.	More intervention is required from the Council to help bring sites forward - need to be more realistic about the supply, push sites that are deliverable and de-risk sites struggling to come forward.
Process Issues	Poor communication between different departments in the Council results in mixed messages;	Speed up processes when determining planning applications; Introduction of formal pre-application advice service;

Main issue theme	Issues identified	Actions identified to address issues
	Lack of support from the Council in terms of delivering sites; Lack of clarity regarding what is required of development (i.e. developer contributions, standards and planning requirements); The process can be too lengthy, due to for example lack of officer resources, the agreement and signing of S106's and discharge of planning conditions; Lack of a formal pre-application service.	Clarify what is required regarding developer contributions, standards and the Council's priorities, through for example the preparation of planning briefs for key sites and typologies; Improve member education and training in relation to strategic level planning matters (including issues regarding under-delivery); Improve cross-departmental communications and partnership working (internal and with key stakeholders (i.e. Highways England, Environment Agency, GMEU, TfGM etc)) to provide a more efficient statutory consultee process; and Continued dialogue with developers and providers.

6.3 Appendix 3 – Housing Delivery Questionnaire 2021 Responses

6.3.1 The following table provides a summary of the issues that were highlighted by respondents to the housing delivery questionnaire.

Main Issue Theme	Issues
General lack of appropriate sites	Lack of appropriately sized, available and suitable sites in good locations. Large amounts of constrained sites in terms of topography, contamination and demolition costs, present significant viability challenges. Unrealistic expectations of land values slow the process and increase costs of development. Oldham's market forces mean that not all available sites are in locations where housebuilders want to build/ where there is strong housing market demand. Over-reliance on town centre and brownfield sites will not provide homes in the right locations.
Constrained/ complex development sites	Green Belt policy means housing development is limited to constrained brownfield sites. Site constraints lead to delays in land negotiations, planning application process and onsite delivery. Industrial legacy has contributed to the identification of several difficult-to-deliver brownfield sites.
Economic/ housing market uncertainty	Removal of Stamp Duty and the Government's Covid-19 Furlough Scheme could impact on the economy and therefore affect the housing market, including delivery of affordable housing. Affordable rents are linked to market values and could be detrimentally impacted if market conditions worsen. Some economic uncertainty but the housing market remains strong.

Main Issue Theme	Issues
Issues of development viability	Increasing construction and material costs are impacting on viability and deliverability. Viability is a key issue for brownfield sites, which are typically located in lower value/ weaker housing market areas and have numerous constraints to overcome. Viability is a significant issue for affordable housing delivery - complex sites, low market rental and sales values and high land values. Market rent value is particularly difficult to deliver. The introduction of measures associated with a move to Net Zero Carbon will worsen viability without government subsidy.
Affordable housing and other policy requirements	The provision of affordable housing is less of a constraint than other policy requirements. The quality bar should be set high but should reflect the local market. Trade-offs between policy requirements are inevitable. Need to build more affordable housing at public expense, not rely on the private sector.
S106 negotiations	Negotiations are slow and over-complicated for what is a standard legal process. S106 acquisitions for affordable housing are competitive and unfair. The legal signing-off process causes delays.
Planning application process	Decision-making/ assessment is too bureaucratic, and process based. Statutory consultees are under-resourced leading to lengthy response times which in turn slows the whole process. Lack of certainty around requirements and inconsistent messaging from different departments.

Main Issue Theme	**Issues**
	The planning department is under-resourced, particularly highways leading to a lengthy application process. The pre-application process is too lengthy. Delays are caused by a lack of capacity to process applications, lack of delegated officer decisions and too many applications requiring planning committee approval. Difficult to maintain communication during the planning application process. 'Approval in Principle' would speed up the process. External consultants employed by the council to assist in applications take too long to respond.
Pre-commencement conditions	Many are unnecessary and should be cleared at approval, especially those where details are included in the initial application e.g. landscaping, boundary treatments and materials. Time consuming to discharge conditions after approval.
Infrastructure/ utilities provision	Perceived lack of local infrastructure and facilities is driving public objections to housing developments. Schemes are delayed by statutory services and their procedures; Infrastructure providers have a monopoly on the market, meaning costs can be high and impact on development viability.
Build process (construction, labour, funding etc.)	Covid-19 and Brexit have impacted on the availability of materials and labour causing delays and increased costs.
Other issues	Lack of up-to-date Local Plan creates uncertainty in the development industry and leads to the current position of speculative development on employment sites and protected land, which is a risky, difficult and lengthy process.