

Report to CABINET

Oldham's Strategic Housing Land Availability Assessment 2024

Portfolio Holder: Councillor Taylor, Cabinet Member for Decent Homes

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16th December 2024

Reason for Decision

To seek approval for the publication of Oldham Council's Strategic Housing Land Availability Assessment (SHLAA) 2024.

Executive Summary

The SHLAA is a technical document identifying land that 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).

The SHLAA forms a key component of the evidence base underpinning housing policies and land allocations and will help to meet the area's housing needs.

The SHLAA assesses the development potential of land that could be capable of delivering homes through an assessment of suitability, availability and achievability (economic viability). It then indicates when it may come forward for development.

The base date of this SHLAA is the 1 April 2024. It provides an update to previous SHLAA (1 April 2023) published in January 2024. The SHLAA 2024 identifies a total housing land supply of 13,475 homes (including allowances) over the short to long term.

More detail on the method used to carry out the assessment, along with the findings of the SHLAA can be found in the main report and the appendices.

Recommendations

It is recommended to approve the Strategic Housing Land Availability Assessment (SHLAA) 2024 for publication.

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 the borough's 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Not publishing a SHLAA leaves the council with an outdated published housing land supply and does not effectively promote the potential supply of housing land within the borough to interested parties for development.

Oldham's Strategic Housing Land Availability Assessment 2024

1 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 69 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 underpins land allocations in Places for Everyone (PfE) and Oldham's Local Plan as well as the council's Brownfield Land Register. It will help the Local Plan to meet the area's housing needs and promotes potential housing land for development.
- 1.3 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.
- 1.4 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 relevant development plans (i.e. 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.

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- 1.5 The land included in this SHLAA includes potential housing land supply found within the existing urban area and the strategic allocations within Oldham identified in PfE.
 - 1.6 Alongside the SHLAA documents published online, a site proposal form - 'Call for Sites' - is available¹, whereby landowners, developers and other interested parties can submit land for consideration in the SHLAA assessment. Any sites submitted will be considered as part of the next SHLAA update, and if suitable, may appear in future housing land supply updates.
 - 1.7 The SHLAA methodology has followed the stages set out in National Planning Practice Guidance (NPPG) note on Land Availability Assessments (updated in July 2019), which sets out the core outputs and process requirements for the assessment. The process is shown in the flow diagram overleaf. The full methodology for the SHLAA is included within the main document.

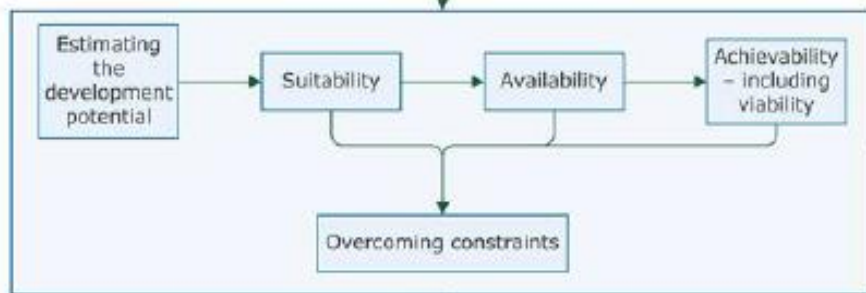
Figure 1: Stages in the SHLAA methodology, taken from NPPG Housing and Economic Land Availability Assessment

¹ A site proposal form – 'Call for Sites' - is available alongside the SHLAA documents at: https://www.oldham.gov.uk/info/201230/monitoring/2134/strategic_housing_land_availability_assessment_shlaa

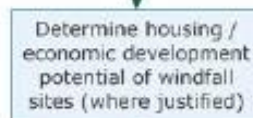
Stage 1 - Site / broad location identification



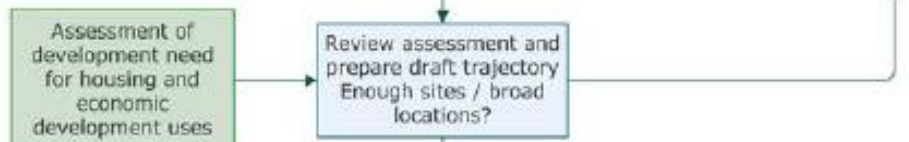
Stage 2 - Site / broad location assessment



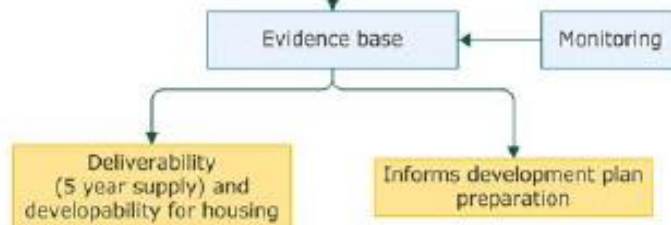
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



- 1.8 On the 30 July 2024 the Government published details of their proposed reforms to the National Planning Policy Framework². Whilst several changes are proposed to the housing policies, the requirement for authorities to produce a SHLAA is not proposed to change. Paragraph 70 of the proposed NPPF text for consultation sets out the requirements for local authorities to prepare a Strategic Housing Land Availability Assessment. The requirements for what a SHLAA should include (an assessment of availability, suitability and likely economic viability) are also unchanged.

SHLAA Findings

- 1.9 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 2024)

Site Category/ Status	Total Dwellings Years 2024-2029	Total Dwellings Years 2029-2034	Total Dwellings Years 2034-2039	Total Dwellings Years 2039+ (post plan)	Total Dwellings All Periods
Sites under construction	1,877	104	0	0	1,981
Sites with extant planning permission	778	168	0	0	946
Saved UDP Phase 1 housing allocations	64	311	0	0	375
Saved UDP Phase 2 housing allocations	3	184	0	0	187
Lapsed and stalled sites >5 dwellings	51	427	109	0	587
Potential & pending sites	720	2,054	3,202	380	6,356
PfE Strategic Allocations	27	1,463	612	376	2,478
<i>Subtotal</i>	<i>3,520</i>	<i>4,711</i>	<i>3,923</i>	<i>756</i>	<i>12,910</i>

² Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK (www.gov.uk)

Site Category/ Status	Total Dwellings Years 2024-2029	Total Dwellings Years 2029-2034	Total Dwellings Years 2034-2039	Total Dwellings Years 2039+ (post plan)	Total Dwellings All Periods
Small sites allowance minus any small sites already identified in supply	0	320	320	0	640
Clearance allowance	25	25	25	0	75
Total	3,495	5,006	4,218	756	13,475

- 1.10 The 'Total Dwellings – all periods' presents the total housing land supply that has been identified from 1 April 2024 to the long term – 13,475 homes. This includes the plan period of PfE (up to 2039) and the post-plan period (post-2039).
- 1.11 Of the housing land supply identified in years 11+, 756 homes have been identified as being deliverable post plan period (post 2039). Homes identified as being deliverable in the post plan period are not subject to small sites or clearance allowances.
- 1.12 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 2024.
 - 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 2024.
 - 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 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.
 - e) *Potential and pending sites* - This category includes sites that have been identified as being suitable for housing in the future but do not, as yet, have any existing residential planning history (i.e. have not previously received permission for housing or are not allocated for residential use); and sites that have been submitted as the subject of a validated planning application, but which are

currently awaiting a decision, where it is considered in line with the SHLAA assessment, that the principle of the site being suitable for housing is acceptable.

- f) *PfE Strategic Allocations* - PfE identifies Strategic Allocations for housing (including mixed-use) and employment land within Oldham. Strategic Allocation policies for each site can be viewed within PfE³.

Small Sites Allowance and Clearance Allowance

- 1.13 The council considers that it is appropriate to make an allowance for small sites (i.e. those below the SHLAA threshold of 5 dwellings). This is because it is difficult and resource intensive to specifically identify and assess small sites that have potential for residential development for inclusion in the SHLAA, beyond the five-year supply. However, sites with planning permission or which are under construction are identified within the five-year supply. A small sites allowance of 64 homes per year is therefore applied from year 6 to the end of the plan period. This is based on previous years small site development. This is updated annually at each SHLAA update.
- 1.14 An allowance is made within the housing land supply for clearance of existing dwellings, where they are lost to demolition or other uses and not replaced. A clearance allowance of 5 homes per year, based on previous levels of clearance, is identified for the 2024 position. This is updated annually at each SHLAA update.
- 1.15 Further detail is provided on allowances within the SHLAA document.

Discounted Sites

- 1.16 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.

Housing requirement and five-year housing land supply position

- 1.17 Places for Everyone (PfE) was adopted on 21 March 2024, becoming part of Oldham’s development framework. PfE sets out Oldham’s housing requirement for 2022 to 2039 (the PfE plan period). Policy JP-H1 of PfE 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.
- 1.18 PfE is less than five years old (being adopted on 21 March 2024) and identified a five-year supply of specific deliverable sites at the time that its examination concluded. As such, as per paragraph 76 of the current NPPF, local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing for decision making purposes if: (a) their adopted plan is less

³ Chapter 11 of Places for Everyone: <https://www.greatermanchester-ca.gov.uk/media/3ccbetc4/post-adoption-places-for-everyone-joint-development-plan.pdf>

than five years old; and (b) that adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded.

- 1.19 Nevertheless, the SHLAA illustrates the five-year housing land supply as part of the overall housing land supply position. Further information on the PfE housing requirement is set out with JP-H1 of PfE.

2 **Current Position**

- 2.1 The SHLAA is a technical document identifying land that might have potential for housing at some stage in the future. The requirement to undertake a SHLAA is set out in paragraph 69 of the National Planning Policy Framework (NPPF).
- 2.2 The base date of this SHLAA is the 1 April 2024. It provides an update to previous SHLAA (1 April 2023) published in January 2024.
- 2.3 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 the borough's 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.
- 2.4 The SHLAA 2024 identifies a total housing land supply of 13,475 homes (including allowances) over the short to long term periods.

3 **Options/Alternatives**

- 3.1 The options to be considered are as follows:

Option 1 – To approve and publish the SHLAA 2024 to provide evidence for the housing land supply position, Brownfield Register and Local Plan Review.

Option 2 – To not approve and publish the SHLAA 2024.

4 **Preferred Option**

- 4.1 It is recommended to approve the Strategic Housing Land Availability Assessment (SHLAA) 2024 for publication, as per option 1. 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 the borough's 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.
- 4.2 Not publishing the SHLAA (option 2) 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.

5 **Consultation**

- 5.1 N/a. The SHLAA has been informed by internal consultation with colleagues in Housing Delivery and Property. The SHLAA will be published online and available for the public to view.

6 **Financial Implications**

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- 6.1 As per the report, the publication of Oldham Council's Strategic Housing Land Availability Assessment (SHLAA) 2024 will be published on the Council's website and no hard copies will be produced. Therefore, there will be no printing costs associated with the proposals in this report. Any other associated revenue expenditure will be met from within the Planning services existing revenue budget.

(Mohammed Hussain)

7 **Legal Implications**

- 7.1 The Council is required to prepare a SHLAA in accordance with the provisions of Chapter 5 of the National Planning Policy Framework so that it has a clear understanding of the land available in its area.

(A Evans)

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

- 8.1 An Equality Impact Assessment has been carried out. The SHLAA scored strong positive, positive and neutral in regard to the Equality Characteristics, Future Oldham Aims and Corporate Priorities.



SHLAA.pdf

9 **Key Decision**

- 9.1 Yes

10 **Key Decision Reference**

- 11.1 ESR-13-24

12 **Background Papers**

- 12.1 There are no background papers for this report.

13 **Appendices**

- 13.1 The following appendices accompany this report:

- SHLAA Main Report
- Appendix 1a: SHLAA Schedule of Sites by Category
- Appendix 1b: SHLAA Schedule of Sites by Ward
- Appendix 2: Housing Land Supply Borough Map (pdf and web map)
- Appendix 3: Detailed Potential Site Assessment Tables (web map only, csv for reporting purposes only)
- Appendix 4: Discounted Sites Table
- Appendix 5: Update on 2023 SHLAA sites