

**Oldham**

**Local**

**Plan**

**Strategic Housing Land Availability  
Assessment as at 1 April 2023**

**January 2024**



**Oldham**  
Council

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# 1 Important information about the Strategic Housing Land Availability Assessment

1.1 In order to avoid any misunderstanding, the council would like to make the following disclaimer on the Strategic Housing Land Availability Assessment (SHLAA) and any other reports relating to its findings:

- *The SHLAA only identifies opportunities for development on sites which are considered to be deliverable, developable and available. It does not allocate sites for development. The allocation of sites for future development is identified through the Places for Everyone (Pfe) Joint Development Plan, Oldham Local Plan (once adopted), or any Neighbourhood Plans in the district;*
- *The identification of potential development land within the SHLAA does not imply that planning permission would be granted on these sites if an application were to be submitted. All planning applications will continue to be considered against the appropriate policies within the adopted Local Plan, having regard to any other material considerations, including national planning guidance. The identification of potential housing sites within the SHLAA also does not preclude them from being considered for other uses;*
- *The SHLAA includes potential sites which are suitable to accommodate 5 housing units or more<sup>1</sup>. The exclusion of sites from the SHLAA which fall below this threshold does not preclude the possibility of a planning application being submitted and later granted. Suitable sites (particularly small sites) for residential development that have not been identified in the SHLAA will continue to come forward through the usual planning process. Site boundaries are based on the information available at the time of the assessment. The SHLAA does not limit an extension or contraction of these boundaries for the purpose of a planning application; and*
- *The classification of sites in relation to when they 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 in the SHLAA. The commentary that accompanies the SHLAA 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. Additionally, some of the original constraints may no longer apply since the information was compiled. The SHLAA is one of a number of background documents used to inform the preparation of the Oldham Local Plan, Brownfield Land Register and guide the housing land supply position. It is a living document which will be regularly updated to take account of development taking place, new development opportunities and other changes in circumstances.*

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<sup>1</sup> Sites below this threshold may be included if they have an extant (current) planning permission or which are under construction for housing.

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## 2 Executive Summary

- 2.1** This report sets out Oldham Council’s Strategic Housing Land Availability Assessment (SHLAA). The SHLAA is a technical document identifying land that might have potential for housing at some stage in the future, as required by the National Planning Policy Framework (NPPF). This states that a housing assessment should be used to establish realistic assumptions about the availability, suitability and the likely achievability of land to meet the identified housing need.
- 2.2** The report contains the methodology used to identify and assess sites, the findings from the assessment and the council’s position in relation to meeting the boroughs housing land requirement. This document is supported by a suite of appendices<sup>2</sup> and all sites are shown on a [web map](#)<sup>3</sup>.
- 2.3** The SHLAA forms a key component of the evidence base underpinning housing policies and land allocations in Places for Everyone (PfE) (formerly the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF)) and Oldham’s Local Plan.
- 2.4** The SHLAA identifies the development potential of land that could be capable of delivering dwellings through an assessment of suitability, availability and achievability and indicates when it may come forward for development.
- 2.5** Whilst the SHLAA is an important evidence source it does not, in itself, determine whether a site should be allocated for development. Allocation will take place through the Local Plan, any Neighbourhood Plan and any site which may be granted Permission in Principle and included on Part II of a Brownfield Register. 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. Unlike in previous SHLAAs, this SHLAA (1 April 2023) includes the “baseline” housing land supply and also sites identified as strategic allocations through PfE. This is further explained below.
- 2.6** The SHLAA has followed the methodology set out in national Planning Practice Guidance (PPG) which states that it should assess each site’s suitability, availability and achievability (including the economic viability of a site). It should then identify the potential type and quantity of development that could be delivered on each site, including a reasonable estimate of build out rates.
- 2.7** This assessment will provide the information as to whether a site can be considered “deliverable” or “developable”:
- To be considered deliverable, sites for housing 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.

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<sup>2</sup> The appendices are outlined at paragraph 7.6 of this report and are published as separate documents on the [SHLAA webpage](#).

<sup>3</sup> Available at: [maps.oldham.gov.uk](https://maps.oldham.gov.uk)

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[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 housing development with a reasonable prospect that they will be 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].

### **SHLAA Findings / Housing Land Supply Position**

**2.8** The sites within the SHLAA are split into different categories depending on their planning status and position within the housing land supply:

- Sites under construction (sites that have received planning permission and a material start has been made on site; the capacity figure quoted is the remaining number of dwellings yet to be completed);
- Sites with extant (current) full or outline residential planning permission;
- Saved housing allocations (UDP Phase 1 and 2);
- Lapsed and Stalled housing sites (sites that have previously had planning permission for housing but where this has expired before being implemented; also “stalled” sites where a material start has been made but where there has been no development activity for at least five years);
- Potential and pending sites (sites that have been identified as being suitable for housing in the future but have not as yet received permission for housing or are not allocated for residential use. Or sites which are the subject of a pending planning application, which are considered to be suitable in principle. On the whole, these sites are considered unconstrained in relation to significant policy or physical limitations).

**2.9** Following consultation in 2018 on changes to the methodology, the Government has confirmed that the 2014-based household projections will 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.

**2.10** Based on the above standard methodology, local housing need for Oldham is 703 homes per year. This is due to the publication of the latest housing affordability ratios by the Office for National Statistics (ONS) in April 2023 and the subsequent adjustment this has made. Projected clearance is considered within the SHLAA and will need to be met on top of the local housing need.

**2.11** As set out in Section 3, once adopted the Places for Everyone (PfE) Joint Development Plan Document will set out Oldham’s housing requirement for the PfE plan period. The PfE Examination in Public began in November 2022 and concluded in July 2023. During the examination hearings, the Inspector’s requested that the PfE authorities consider a potential

modification to the submitted plan period of 2021-2037 to a plan period of 2022-2039<sup>4</sup>. It was considered that this plan period better aligns with the timeline for preparing the Plan.

- 2.12** The proposed amended plan period for PfE (how many years the plan will cover) is 17 years – 2022-2039. PfE proposes a stepped housing requirement for Oldham, which based on the proposed amended plan period would be 404 homes per year for 2022-2025, 680 homes per year for 2025-2030, and 772 homes per year for 2030-2039. The stepped requirement equates to an average of 680 homes per year. Across the plan period the total housing need for Oldham is 11,560, including a buffer to provide flexibility.
- 2.13** Unlike previous years, the housing land supply set out within this SHLAA includes the PfE Strategic Allocations. In previous years, some sites within the PfE Strategic Allocations were included if they had received planning permission. Given the advanced stage of the PfE Plan<sup>5</sup>, it is considered appropriate to include the remaining allocations within the supply looking forward from April 2023.
- 2.14** Table 1 below sets out the number of dwellings in each of the SHLAA categories and places them in time periods up to 2039 and beyond. The column headed "Total Dwellings 2023-2028" represents the five-year housing land supply. "Potential/ Pending" sites included are those which have yet to receive permission but where it can be evidenced that they will be delivered within five years e.g. they have been sold to a developer and/or a planning application has been submitted or is being prepared. As table 1 shows 552 homes have been identified as being deliverable post 2039. Clearance and small sites allowances only apply to the plan period and are not applied beyond 2039.
- 2.15** To better align with PfE housing land supply monitoring and provide a more accurate indication of housing supply/ anticipated delivery, the housing land supply for 2023 has been identified on an annual basis, informed by build out rate assumptions and available evidence (i.e. from planning applications or development briefs/ proposals), as set out in section 4. However, for the purposes of summarising and presenting analysis of the housing land supply position within this report, the time periods of 2023-2028; 2028-2033 and 2033-2039 are primarily used, as set out within table 1 below. The annualised supply is set out within Appendix 1a and 1b.

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<sup>4</sup> See Places for Everyone Plan Composite Version: Modifications Version 2023, available at: [https://www.greatermanchester-ca.gov.uk/media/8565/composite-pfe-plan\\_sep2023-reduced-file-size.pdf](https://www.greatermanchester-ca.gov.uk/media/8565/composite-pfe-plan_sep2023-reduced-file-size.pdf)

<sup>5</sup> The GMCA submitted Places for Everyone for examination on 14 February 2022. Independent Inspectors were appointed, and examination hearings were held between 1 November 2022 and 5 July 2023. Main Modifications to the Plan put forward during the examination are being considered currently.

**Table 1 Strategic Housing Land Supply (as at 1 April 2023)**

<b>Site Category/ Status</b>	<b>Total Dwellings Years 2023-2028</b>	<b>Total Dwellings Years 2028-2033</b>	<b>Total Dwellings Years 2033-2039</b>	<b>Total Dwellings Years 2039+ (post plan)</b>	<b>Total Dwellings All Periods</b>
Sites under construction	1,241	0	0	0	1,241
Sites with extant planning permission	1,476	460	0	0	1,936
Saved UDP Phase 1 housing allocations	7	358	0	0	365
Saved UDP Phase 2 housing allocations	0	181	0	0	181
Lapsed and stalled sites >5 dwellings	61	508	147	0	716
Potential sites	417	2,410	3,240	176	6,243
PfE Strategic Allocations	0	1,299	806	376	2,481
<i>Subtotal</i>	<i>3,202</i>	<i>5,216</i>	<i>4,193</i>	<i>552</i>	<i>13,163</i>
Small sites allowance minus any small sites already identified in supply	0	365	438	0	803
Clearance allowance	30	30	36	0	96
<b>Total</b>	<b>3,172</b>	<b>5,551</b>	<b>4,595</b>	<b>552</b>	<b>13,870</b>

## 3 Introduction

- 3.1** The Strategic Housing Land Availability Assessment (SHLAA) is a technical document comprising a list of sites that might have potential for housing at some stage in the future by assessing the suitability, availability and achievability of these sites. The requirement to undertake a SHLAA is set out in paragraph 68 of the National Planning Policy Framework (NPPF) 2021. This states that authorities should have a clear understanding of the land available in their area through the preparation of a SHLAA. It goes on to state that, from this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and achievability (including likely economic viability).
- 3.2** The SHLAA forms a key component of the evidence base which will underpin housing policies and land allocations in Places for Everyone (PfE) and the Oldham Local Plan. Paragraphs 74-76 of NPPF make reference to the need for local planning authorities to ensure the Local Plan meets the area's housing needs and to ensure a continuous five years' supply of housing land. This will be informed by evidence such as the SHLAA, which will contribute to identifying specific sites or broad locations for growth for a further six to ten years and, where possible, up to fifteen years after the Plan is adopted. The SHLAA therefore identifies a wide range of sites from those which form part of the five-year housing supply (including sites which are already under construction) to those which may have potential in the longer term.
- 3.3** It is also used to inform the council's [Brownfield Land Register](#) which is published separately. The regulations<sup>6</sup> on this require the publication of registers of previously developed land that is considered appropriate for residential development. The assessment of sites carried out as part of the SHLAA will help the council to decide which sites could be added to the Register.
- 3.4** Whilst the SHLAA is an important evidence source it does not, in itself, determine whether a site should be allocated for development or granted planning permission. 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.
- 3.5** [The Levelling-up and Regeneration Act](#) sets out the basis for reforms to national planning policy (NPPF). The Act requires further regulations and amendments to national planning policy and other guidance.
- 3.6** The reforms (as were introduced in the previously published Levelling-up and Regeneration Bill in 2022) make clear that the standard methodology for calculating local housing need should be an advisory starting point for identifying an appropriate figure, and that local authorities may plan for more or less homes based on local circumstances which may justify an alternative approach. There is also less emphasis placed on five-year supply and housing delivery within the reforms, instead ensuring authorities have up-to-date local planning policies. However, the requirement for authorities to prepare a Strategic Housing Land Availability Assessment to identify available housing land across the short to long term remains as currently published. There are no identified reforms to this policy.
- 3.7** Therefore, whilst the approach to housing need, delivery and five-year supply may change,

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<sup>6</sup> Town and Country Planning (Brownfield Land Register) Regulations 2017.

the requirement for authorities to produce a SHLAA is not proposed to change. Analysis within this document, including that of the borough's housing delivery against housing need and five-year supply analysis, relates to the requirements within the currently adopted NPPF. The approach to presenting this information in future SHLAAs will be determined in line with the adopted national planning policy which applies at the time of preparation.

### ***Places for Everyone (PfE)***

- 3.8** Places for Everyone is a long-term plan of nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) for jobs, new homes, and sustainable growth. The PfE Publication Plan was published by the GMCA on behalf of the nine districts, in August 2021.
- 3.9** The Plan is a joint development plan of the nine districts which will determine the kind of development that takes place in their boroughs, maximising the use of brownfield land and urban spaces while protecting Green Belt land from the risk of unplanned development. It will also ensure all new developments are sustainably integrated into Greater Manchester's transport network or supported by new infrastructure.
- 3.10** The Plan is the result of a process that began as the Greater Manchester Spatial Framework (GMSF) in 2014 and has been informed by the feedback received from residents, businesses and the development industry to previous consultations on that Plan. The nine districts decided to continue to produce a joint plan following the withdrawal of Stockport Council from the GMSF in December 2020. References to the GMSF relate to the previous iterations of the joint plan which has informed PfE.
- 3.11** Following public consultation in 2021, the Plan was submitted to the Secretary of State in January 2022. Independent Inspectors were appointed to undertake an Examination in Public of the Plan, and the hearings which began in November 2022 concluded in July 2023.
- 3.12** The most recently published version of the Plan is the 'Places for Everyone Composite Plan: Modifications Version' (published in September 2023)<sup>7</sup>. This incorporates proposed main modifications put forward during the Examination in Public (which ran from November 2022 to July 2023). The main modifications have recently been consulted upon (consultation ran from 11 October 2023 to 6 December 2023) and will now be considered alongside any representations put forward during this consultation by the Inspectors. The Inspectors will then issue their final report in due course.
- 3.13** Notwithstanding the main modifications proposed to the Publication Plan, the strategic context remains as was published in the Publication Plan, which is that the PfE Plan will:
- Set out a spatial strategy to guide development in the nine districts over the plan period;
  - identify the amount of new development that will come forward across the nine districts, in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused;
  - support the delivery of key infrastructure, such as transport and utilities; protects the

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<sup>7</sup> Places for Everyone Plan Composite Version: Modifications Version 2023, available at: [https://www.greatermanchester-ca.gov.uk/media/8565/composite-pfe-plan\\_sep2023-reduced-file-size.pdf](https://www.greatermanchester-ca.gov.uk/media/8565/composite-pfe-plan_sep2023-reduced-file-size.pdf)

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important environmental assets across the city region;

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

**3.14** The SHLAA methodology outlined in this report follows the relevant Planning Practice Guidance (PPG) note updated in July 2019 by the Department of Levelling Up, Housing and Communities (DLUHC) (formerly Ministry of Housing and Local Government (MHCLG)), which sets out the core outputs and process requirements for the assessment. PPG recommends that a “call for sites” is undertaken as part of the SHLAA process. As part of the preparation of PfE (named GMSF at the time) 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, was carried out between 2015-2017. Alongside the sites identified through other sources (see Table 2), the results of this call for sites process contributes to the range of sites and broad locations that are considered in the SHLAA where they fall within the urban area (and not in the Green Belt).

### ***Scope of Assessment***

**3.15** PPG states that the area selected for the assessment should be the housing market area (HMA). Discussions on the Areas of Assessment for housing land requirements were carried out through the first GMSF consultation. The Options Paper concluded that, given the complex functioning of housing and labour markets within GM, the issues of district identity, and the availability of population and household projection data, it was considered that the most appropriate unit of analysis below GM was the individual districts. These were subsequently used as the areas of assessment for the October 2016 draft GMSF. Therefore, the area of geographical assessment for the SHLAA – which equates to the Housing Market Area - is the Oldham Borough boundary (excluding those parts of the Borough that fall under the responsibility of the Peak District National Park Planning Authority).

**3.16** As stated, the council is working collaboratively with the GMCA and the other eight GM districts to ensure that, whilst each authority will undertake their own SHLAA, the broad approach is consistent and will be used to inform PfE.

**3.17** This report updates the 2022 SHLAA, published in February 2023. The base period for this assessment is 1 April 2023. It provides the five-year land supply position covering the period between 1 April 2023 and 31 March 2028 and identifies the potential supply for the medium (years 6 to 10) and longer term (11 years plus).

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## 4 Methodology

**4.1** The purpose of this section is to outline the procedure used for completing the various stages of the SHLAA, informed by the methodology set out in the current PPG<sup>8</sup>. The guidance recommends the use of this standard process as it makes clear what inputs and processes are required to create a robust assessment of land availability, helping to ensure a consistent and thorough review is undertaken. It states that the assessment should:

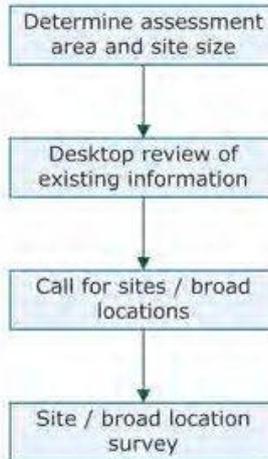
- Identify sites and broad locations with potential for development; assess their development potential; and assess their suitability for development and the likelihood of development coming forward (the availability and achievability);
- Set out the potential type and quantity of development that could 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;
- Include an indicative trajectory of anticipated development and consideration of associated risks.

**4.2** The flow chart overleaf sets out the various stages in the methodology:

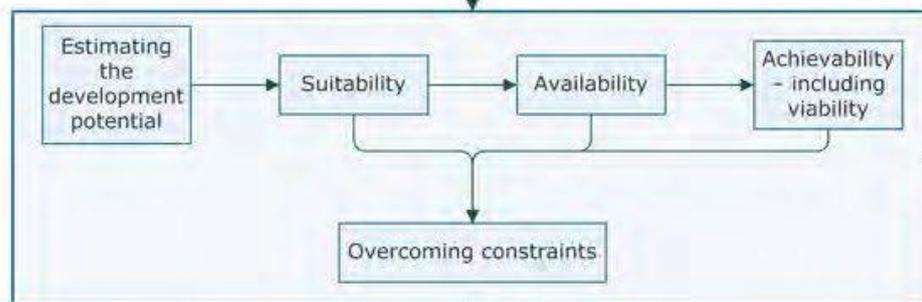
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<sup>8</sup> <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

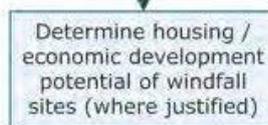
**Stage 1 - Site / broad location identification**



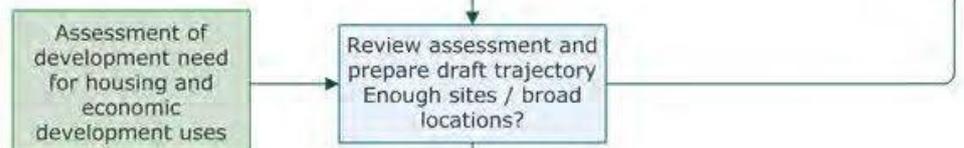
**Stage 2 - Site / broad location assessment**



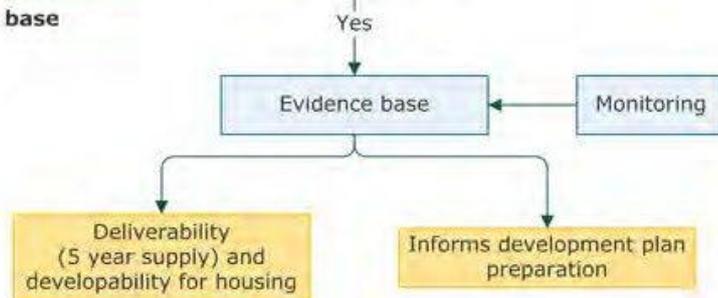
**Stage 3 - Windfall assessment**



**Stage 4 - Assessment review**



**Stage 5 - Final evidence base**



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## Stage 1: Site and Broad Location Identification

### *Determining which sites and areas will be surveyed*

- 4.3** PPG advises assessing a range of different site sizes from small-scale pieces of land to potential large-scale development parcels. The guidance suggests applying a minimum size threshold of sites and broad locations to include only those capable of accommodating five or more dwellings or economic development on sites of 0.2ha (or 500m<sup>2</sup> of floor space) and above. However, the guidance allows for alternative thresholds if appropriate.
- 4.4** As a general rule, aside from small sites under construction or which have an extant (current) planning permission for housing, rather than a specific site area, the threshold of a capacity of 5 dwellings or more has been used to determine which sites should be included in the SHLAA. This threshold relates to the small sites allowance which is discussed in more detail in section 4.48 onward.

### *Data sources*

- 4.5** Table 2 below identifies the data sources from which the list of sites and broad locations has been selected for this assessment:

**Table 2 Potential Data Sources for Site/Location Identification**

Type of Site	Potential Data Source	Explanation
Remaining capacity on housing sites under construction	Building control records (Uniform)/ Council tax records	Commencements and completions of dwellings are monitored quarterly from Building Control, Council Tax and site visit information.
Sites with planning permission for housing or where the council has resolved to grant planning permission subject to the completion of a S106 Agreement. This includes any sites where permission has lapsed or where construction has stalled.	Planning application records (Uniform) / Housing Land Audit (HLA) (held by Strategic Planning)	Details of all sites granted planning permission for residential use are taken from the council's planning application record system (Uniform) and entered into the HLA database. This is used to monitor the housing land supply and record housing completions (using building control records, council tax records and site visits).
Sites submitted by residents, landowners and developers	GM-wide call for sites exercise, undertaken as part of the GMSF consultation.	A GM call for sites exercise was launched in November 2015 and closed in February 2017. This asked local residents, businesses, landowners and developers to identify sites that they thought could be suitable for housing or employment development. The assessment of these has been carried out at GM level but where they fall within the urban area (not in the Green Belt), sites have also been included for local assessment through the SHLAA.
Sites submitted by residents, landowners and developers	Previous local call for sites exercises and ongoing call for sites exercise (from SHLAA)	There is an ongoing call for sites exercise which was published as part of the previous SHLAA in 2022. Any sites which remain undeveloped and meet the site and location criteria have been included in the SHLAA for consideration. The ongoing call for sites will remain open for sites to be submitted in response to this SHLAA until the next update.
Sites submitted by residents, landowners and developers	Sites submitted as part of any further Local Plan consultation	The council issued a Regulation 18 notice <sup>9</sup> , in 2017 marking the beginning of the new Local Plan review. A number of sites were submitted for consideration as part of

<sup>9</sup> Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out specific requirements for local planning authorities relating to the initial stages of plan production.

Type of Site	Potential Data Source	Explanation
		the early consultation on this <sup>10</sup> . Sites submitted to these consultations are being considered in relation to identifying Site Allocations as part of the Local Plan Review, however where appropriate sites may be added to the SHLAA.
Existing housing allocations and site development briefs / Masterplans on sites not yet with planning permission	Local Plan allocations for housing	Remaining (i.e. un-developed) saved Phase 1 and 2 housing allocations which were carried forward into the Joint Core Strategy and Development Management Development Plan Document (Joint DPD) adopted in November 2011 from the previous Unitary Development Plan (UDP) 2006.
Existing housing allocations and site development briefs / Masterplans on sites not yet with planning permission	Masterplans / Development briefs	Sites identified for potential residential uses within development briefs/ masterplans such as, Oldham's 'Creating a Better Place' Framework and Royton Town Centre Masterplan.
Existing housing allocations and site development briefs / Masterplans on sites not yet with planning permission	Oldham Town Centre Vision/ 'Creating a Better Place' Strategic Framework	The Oldham Town Centre Vision that has been refreshed to include plans for around 2,000 modern homes, 1,000 new jobs and a linear urban park, in support of delivering the Creating a Better Place strategic framework. The proposals recognise that quality housing must be complemented by access to local services, public transport, shops and open green space to improve quality of life and make Oldham an even better place in which to live, work, visit and do business. The refresh of the Vision coincides with Oldham Council's purchase of Spindles Town Square Shopping Centre to act as a catalyst for economic regeneration, including releasing land for new homes in the town centre.
Existing Potential Sites database and previous published SHLAA / SHLAA updates	SHLAA database	The council has an extensive database of sites which have previously been identified as having potential for development; some of these may have been discounted in the past due to former policy non-compliance and these will be reconsidered in light of the new Local Plan Review and the desire to minimise the loss of Green Belt.
Land in Oldham Council's ownership	Council's Asset Register / District Asset Review / Open Space Study	Sites which are being considered for disposal will be assessed for their development potential where appropriate. This may include redundant council facilities/buildings, cleared sites and existing open space.

<sup>10</sup> The council undertook an initial consultation during July and August 2017 seeking views on what the new Local Plan should contain. Additional consultation will take place as the different stages of the Local Plan are prepared and published. Most recently the Local Plan: Issues and Options consultation took place between July-August 2021. Further information can be found in the council's Local Development Scheme: <https://www.oldham.gov.uk/info/200709/documents/in-the-local-development-framework/230/local-development-scheme>

Type of Site	Potential Data Source	Explanation
Surplus and likely to become surplus public sector land	Records of public sector land / Land Commission map	Assessing records and maps and engagement with strategic plans of other public sector bodies such as Central Government, National Health Service, Police, Fire Services, utility providers, statutory undertakers.
Additional opportunities in established uses / designated for other uses which may have potential for housing development	Mill Survey	A comprehensive survey of Oldham's historic textile mills was carried out by Historic England in 2016. This recorded the condition, occupancy and existing use of mills. As the mill sites form an important source of brownfield land, they have been included in the SHLAA to assess future residential potential.
Additional opportunities in established uses / designated for other uses which may have potential for housing development	Oldham's Mill Strategy (November 2021)	A Mills Strategy (2021) has also been produced for Oldham that identifies which undesignated mills should be protected and whether they have scope for conversion, taking into account viability and other constraints. The strategy also identifies which undesignated mills (mills that are not listed) are of less importance and where opportunities arise the council may be able to be less protective over these mills, potentially enabling them to be developed for alternative uses, such as new homes. The Mill Strategy (as published November 2021 and previous drafts) was used to inform the site assessment, as appropriate.
Additional opportunities in established uses / designated for other uses which may have potential for housing development	Retail and Leisure Study	A Borough-wide Retail and Leisure Study was completed in September 2020 by Santec. The report provided an assessment of retail and leisure needs in Oldham and will help to inform new retail and town centres policies. The report concluded a number of findings, including identifying several sites with residential potential in the borough's centres.
Additional opportunities in established uses / designated for other uses which may have potential for housing development	Discussions with Regeneration section	The council's Regeneration section work closely with business and investors and are aware of potential development opportunities or relocation plans across the borough.
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes e.g.	Sources include: Local authority empty property register National Land Use	Vacant land and buildings have been assessed for their housing development potential.

Type of Site	Potential Data Source	Explanation
offices to residential)	<p>Database-Previously Developed Land</p> <p>Commercial property databases</p> <p>Open Space Study</p> <p>Employment Land Review</p> <p>Mill Survey</p> <p>Oldham's Mill Strategy</p> <p>Retail and Leisure Study</p> <p>'Creating a Better Place' Strategic Framework</p>	
Other greenfield land around edge of the urban area	<p>Site surveys / Ordnance Survey maps / Aerial photography</p>	<p>The edges of existing urban areas and potential infill opportunities were assessed to identify any potential for urban expansion; this was done as a desktop exercise scrutinising OS and aerial maps, site visits, local knowledge and through suggestions at workshops / consultations.</p>
Large scale redevelopment and redesign of existing residential or economic areas	<p>Regeneration priority areas / proposals</p>	<p>Additional capacity or newly available land may emerge as part of wider clearance / redevelopment proposals.</p>

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- 4.6** As part of the Local Plan Review, the council will also be undertaking an Employment Land Review which will help to better understand the area's employment land supply. When completed, the review will feed into future housing assessments by analysing the quality and suitability of existing economic land to determine whether it is still fit for purpose and consequently whether the land could be better developed for another use, such as housing.

## **Stage 2: Site / Broad Location Assessment**

### ***Desktop review of existing information***

- 4.7** In accordance with the PPG, the long list of sites and broad locations derived from data sources and the call for sites was assessed against national policies and designations to establish the development potential of the land and whether they should be included in the SHLAA survey.
- 4.8** All sites included within the SHLAA have been plotted onto the council's Geographical Information System (GIS) and a dedicated SHLAA database of known sites and locations records the following information:
- Site name, address and other details (including location coordinates);
  - Nature of the land and surrounding area (e.g. brownfield / greenfield; residential, industrial etc.);
  - Existing and / or previous uses, where known;
  - Planning history;
  - Land ownership details, where known;
  - Constraints information;
  - Accessibility;
  - Site visit notes;
  - Development potential (if not already identified through existing planning permission);
  - Assessment of deliverability and developability (informed by of an assessment of the site's suitability, availability and achievability).

- 4.9** A review of existing information held by the council will also be used to identify potential constraints to development. Such sources include information held by Development Management (conservation areas, listed buildings, tree preservation orders etc.), Environmental Health (contaminated land, noise, proximity to landfill sites etc.), and Strategic Planning and Information (public transport accessibility, access to key services, current Local Plan designations etc.). There will also be consultation with key organisations (such as Environment Agency and United Utilities) and other sections within the council as appropriate. [MappingGM](#) tools and data, which provides information on key constraints and infrastructure, has also been used to inform the assessments.
- 4.10** PPG states that those sites where particular policy constraints have been identified through the desktop analysis should still be included in the wider assessment process for the sake of comprehensiveness, but these constraints must be clearly set out. Importantly, however, it must be borne in mind that the desktop review should test the previously defined constraints on whether they are still relevant and appropriate, rather than unquestionably replace them.
- 4.11** PPG makes clear that the site survey should be proportionate to the level of detail required for a robust appraisal. Therefore, a greater level of assessment has been carried out on those sites that considered realistic candidates for development, particularly those that could come forward in the shorter term.

#### ***Assessing Suitability, Availability and Achievability of Sites / Broad Locations for Development***

- 4.12** Assessing the suitability, availability and achievability (including the economic viability of a site) will provide 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. 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.

#### ***Assessing the suitability of sites / broad locations for development***

- 4.13** An assessment will be made of the suitability of the identified use or mix of uses of a particular site or broad location, including whether the development may meet the needs of the community.
- 4.14** The assessment of suitability should be guided by:

National planning policy set out in the NPPF, local planning policies in the adopted Local Plan (where these are considered up-to-date and are relevant to the SHLAA)

and emerging Local Plan documents;

- any physical and other constraints identified through desk top surveys and site visits such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- landscape features, nature and heritage designations;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- environmental / amenity impacts experienced by would be occupiers and neighbouring areas.

**4.15** When assessing the sites against the adopted Local Plan, it will be necessary to take account of how up to date the policies are and whether identified constraints are still appropriate. The extent to which constraints can be overcome will also need to be considered, as well as the necessary action required to achieve this. This may include, for example, investment in new infrastructure, dealing with land ownership issues, environmental improvement and considering whether current development policies are responsible for constraining development. An indication of when and how the action could be delivered will also need to be given, as well as stating how this will affect the subsequent deliverability of the sites. Oldham's Local Plan is currently being reviewed and the strategy and policies will be in line with PfE. Changes to national policy guidance and legislation will also be taken into account as appropriate.

**4.16** Sites allocated in existing plans or with extant planning permission will generally be considered suitable for development, given that an assessment of suitability formed part of the decision to grant planning permission or allocate the site. However, it may be necessary to assess whether circumstances have changed which would alter their suitability.

**4.17** In determining the suitability of sites, the following key assumptions have been made:

- Although the NPPF encourages the use of previously developed land, it does not promote a sequential approach to the use of land. Therefore, greenfield sites which do not have any other policy protection or constraints may be considered suitable for development;
- Apart from those sites identified for development in PfE and where appropriate, brownfield sites within the Green Belt, or those which have planning permission, sites in the adopted Green Belt have been considered unsuitable for development given their conflict with Local Plan policy and the very strong protection afforded to the Green Belt in NPPF. These sites have not gone through any further suitability assessment;
- Land within established employment areas (in particular allocated Business Employment Areas and Saddleworth Employment Areas) have generally been considered unsuitable for housing development. This is unless there is known developer interest in a site and it is considered likely that justification for the loss of employment land could be provided. This is also the case for mills and other

employment sites that are in good condition, are occupied or are providing an important economic function. These will continue to be reviewed but if they appear to be economically viable or still provide an important local employment function, the recommendation will usually be that they remain in their current use. As this is only a general assessment, some employment sites identified as suitable may prove not to be when assessed in more detail (i.e. when more evidence is available);

- Sites which are constrained by current open space policy will need be considered against the current and future needs identified in the recently published Open Space Study (2022). The Open Space Study identified deficiencies in open space provision, as such open space sites have been discounted unless the site is identified in a particular regeneration programme. Compensation for the loss of the site should be provided in line with local planning policy;
- Other Protected Open Land (OPOL): this is a local designation and sites currently allocated as OPOL are being reviewed as part of the preparation of the new Local Plan to assess whether in line with the definition in NPPF they meet the criteria for future protection as Local Green Spaces (LGS). An initial assessment of these sites has suggested that some areas may have housing potential. However, for these sites to be available for development they would need to be de-designated as a protected site through the Local Plan process. Those sites which are currently felt to have potential therefore remain as discounted but this will continue to be reviewed as part of future SHLAAs. Any OPOL which may form part of a PfE allocation has been assessed separately.

#### **4.18** Other reasons which may make a site unsuitable:

- Sites where there is no physical point of access to the highway and no prospect of creating an access within the landholding;
- The topography of the site makes development difficult;
- The site is significantly affected by pylons and/or masts which would reduce the developable area;
- Land identified by the environment agency as falling within flood risk zones 3a and/or 3b;
- Sites within national designations including SSSIs, Special Areas of Conservation and Special Protection Areas;
- Sites where it is known that they are not available and there is no reasonable prospect of residential development being achieved;
- Current use of the site is the most appropriate and should be retained e.g. employment, allotments, car park, open space.

#### **4.19** Sites considered unsuitable are deemed as having no housing potential and will not be put through the full assessment process and no potential dwelling capacity will be counted towards the land supply.

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### ***Assessing the availability of sites / broad locations for development***

- 4.20** A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop or sell the land for development.
- 4.21** In assessing the availability of sites for development, land ownership constraints have been examined in the following ways:
- Determining whether a site is in active use and how likely it is that this will cease and the site will become available for other uses;
  - The likely disposal date of any council or other public sector land;
  - Ownership information from planning application forms (with the assumption that if the applicant was also the owner of the site at the time of the application, then it is reasonable to assume there are no ownership issues to prevent development);
  - Knowledge of whether a site is owned by a developer, has had developer interest or has been marketed for sale;
  - Sites suggested for development through a call for sites process (including local call for sites and through GMSF consultations).
- 4.22** Where potential availability problems have been identified, then a judgment will need to be made as to how and when they can realistically be overcome. This will help to determine where the site may sit in the housing land supply. Consideration should also be given to the delivery record of the developers or landowners putting sites forward, whether the planning background of a site shows a history of unimplemented permissions or how well the promotion of a site through the development plan process has been translated into the implementation and delivery of new housing on the ground.

### ***Assessing the achievability (viability) of sites / broad locations for development***

- 4.23** A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.
- 4.24** In assessing whether each site is achievable, account has been taken of adjacent uses, attractiveness of the locality and the level of potential market demand. In addition, the following factors have been considered:
- Whether planning permission has been implemented / construction has

- commenced on the site;
- The known intentions of the developer/landowner in bringing the site forward for development;
- Evidence of viability prepared to support the development of the site e.g. documents submitted as part of a planning application or in a call for sites submission;
- Obvious costs that would impact on a scheme's viability (for example, remediation costs on a site that has been used for industrial purposes or landfill in the past).

### ***Estimating the development potential of each site***

- 4.25** When assessing the capacity of a site, it is acknowledged that not all of a site be built on. Site areas are recorded in 'gross' hectares but in order to reflect the realities of development it is necessary to identify the 'net' development area. If a site were to be developed in real-life this developable area would need to exclude areas such as major distributor roads, community facilities (such as a new school or health centre), significant areas of open space and landscaping and green infrastructure. In general, the greater the site area the greater the area given over to supporting infrastructure.
- 4.26** For the SHLAA the following assumptions on net developable area were used (in line with the approach taken from the PfE strategic allocations):
- Large Sites (100 hectares +): likely to have greater requirements for ancillary facilities/uses, for example schools, open space, roads therefore assume 70% of gross area;
  - Small Sites (less than 100 hectares): these are smaller in size therefore fewer infrastructure/service requirements – assume 80% of gross area.
- 4.27** Aside from the PfE sites which have been assessed separately as part of the PfE Plan preparation, there are no large sites assessed in this SHLAA, the 80% assumption has generally been used for all sites which do not already have an identified capacity or where other identified constraints have determined a developable area. In some instances, such as for sites within the town centre or those with a very limited footprint, a higher developable area has been assumed.
- 4.28** Having calculated the developable area, it is then necessary to estimate the potential development capacity of each site i.e. the number of dwellings the site could accommodate. Many of the sites have been put forward with an indicative site capacity or this has already been established through the plan making or planning application process. Where detailed information from planning applications, masterplans or information provided from Call for Sites is available, that will be used to allocate dwelling yield to the appropriate time-frame.
- 4.29** For other sites where there is no suggested capacity, the SHLAA has used the proposed density assumptions for different locations set out in the PfE Composite

Plan published in September 2023<sup>11</sup> (adjusted for any individual site characteristics or physical constraints). Increasing residential densities is an essential element of the PfE strategy and new development should take advantage of high public transport connectivity where applicable. When determining densities, regard should be had to those set out in Table 3 overleaf, which has been adapted from the proposed PfE policy to reflect Oldham’s centres hierarchy.

**Table 3 PfE Density Assumptions for New Housing**

Location <sup>12</sup>	Minimum net residential density (dwellings per hectare)	Minimum net residential density (dwellings per hectare)	Minimum net residential density (dwellings per hectare)
	Within the location	Within 400 metres	Within 800 metres
<b>Designated centres:</b>			
Designated town centres (E.g. Oldham Town Centre)	120	70	50
Other designated centres (e.g. the boroughs other centres of Chadderton, Shaw, Royton, Hill Stores (Huddersfield Road), Lees, Uppermill and Failsworth)	70	50	35
<b>Public transport stops:</b>			
Rail stations and Metrolink stops in large designated centres (e.g. within Oldham Town Centre)	N/A	120	70
Rail stations with a frequent service and all other Metrolink stops	N/A	70	50
Areas within GMAL <sup>13</sup> 6 and above or it’s equivalent	50	35	35
<b>All other locations:</b> Minimum net residential density of 35 dwellings per hectare			

**4.30** Lower densities may be acceptable where they can be clearly justified, including where there is a demonstrable need for a particular type of housing that cannot be delivered at higher density or site-specific issues, such as design or impact on landscape.

<sup>11</sup> See Places for Everyone Plan Composite Version: Modifications Version 2023, Policy JP-H4, page 182-183, for full table.

<sup>13</sup> GMAL is an abbreviation of Greater Manchester Accessibility Layer, which measures the accessibility of locations across Greater Manchester by walking and public transport. Areas are scored on a scale of 1-8, with 8 being the most accessible. GMAL scores are published online at data.gov.uk.

**4.31** In order to achieve an appropriate mix of housing developments should include the provision of houses and/or apartments having regard to the following and the need to achieve high quality design:

- a. 35-70 dwellings per hectare: primarily houses;
- b. 70-120 dwellings per hectare: mix of houses and apartments;
- c. 120+ dwellings per hectare: primarily apartments, incorporating houses and/ or ground-floor duplexes where practicable.

**4.32** In identifying the capacity of Potential Sites within the SHLAA, the density assumptions set out above were applied. In the case of historic mills, which are often large, multi-storey buildings with a large existing floorspace, a higher density has been applied to account for conversion to apartments or, if the mill is to be demolished, to make the most efficient use of land.

**4.33** The true potential of a site can only be determined by more detailed assessment having regard to a number of factors outside the scope of this assessment so it should be noted that the dwelling capacity of sites in this report is indicative only. It should not be assumed that planning permission may be granted only for the number of dwellings identified in the SHLAA.

#### ***Timescales and rate of development***

**4.34** The information gathered from assessing the suitability, availability and achievability of the development land will be used to determine the likely timescale within which each site is capable of development. This may include indicative lead-in times and annual build-out rates.

**4.35** Having regard to the definition of 'deliverability' in the glossary of NPPF, there is an assumption that sites with full planning permission for residential use are deliverable within the next five years, unless there is clear evidence that they will not be implemented within this timescale. Sites with outline permission or existing housing allocations may be included in the five-year supply if there is evidence to suggest that they will be delivered in the short term, or they do not constitute 'major' development (i.e. they have a capacity of under 10 dwellings).

**4.36** Alongside sites with planning permission, some sites without extant permission (as of 1 April 2023) have been included in the five-year supply. These are generally those which have previously been identified as a potential housing site and which are going through the planning permission process and/or where the council is satisfied that the landowner/developer has demonstrated there will be development on the site within the next five years.

**4.37** For other sites, an estimate has been made as to when they will come forward for development, informed by the following factors:

- The size of the site, assuming that (for sites without an extant permission) development that is not major (i.e. less than 10 dwellings) is usually likely to be deliverable sooner than larger, more complicated sites;
- Whether a site already benefits from outline permission or the landowner has

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shown as interested in developing the site;

- Regeneration and funding priorities;
- Whether the site is occupied or whether existing uses will need to be relocated; Whether there is known developer interest in the site;
- Evidence relating to financial viability of the site;
- Any need for site assembly or any legal or ownership constraints;
- The need for mitigation or particular infrastructure provision before development can take place; and
- Market conditions.

**4.38** In order to establish realistic delivery rates, analysis has been undertaken of the average time taken between a grant of planning permission and start of construction – and then the number of completions that take place per year<sup>14</sup>. It should be noted that this analysis is an estimate and some types of development, such as those including affordable homes, are often driven by funding commitments and tend to be built out relatively quickly and are therefore not necessarily typical of the housebuilding market. Delivery rates are therefore indicative and the delivery of sites may differ in reality. Where other information on delivery rates is available this has been used instead.

**4.39** Table 4 overleaf, sets out the indicative delivery rates which have informed the SHLAA (as at 1 April 2023), where appropriate:

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<sup>14</sup> Oldham's Housing Delivery Test Action Plan Part 1 - 'Table 3: Lead-in times and build out rates', page 18, available at: [https://www.oldham.gov.uk/info/201230/monitoring/2135/housing\\_delivery\\_action\\_plan](https://www.oldham.gov.uk/info/201230/monitoring/2135/housing_delivery_action_plan)

**Table 4 Indicative Delivery Rates**

Size of site (dwellings)	Average number of dwellings completed per year
100+	68
50-99	51
20-49	21
10-19	7
5-9	5
Under 5	1

**4.40** Having regard to the above considerations, each site was placed into one of three time period categories:

- Likely to be developed within 1 to 5 years (i.e. 01/04/23 to 31/03/2028);
- Likely to be developed within 6 to 10 years (i.e. 01/04/2028 to 31/03/2033);
- Likely to be developed 11 years plus (i.e. 01/04/2033 onwards).

**4.41** The categorisation of sites within the above timescales is based on the circumstances of the site and officers' views held at the time of the assessment. Circumstances may change resulting in sites coming forward sooner or later than first envisaged.

**4.42** As set out earlier in the report, an annualised supply is provided in Appendix 1a (and 1b).

### **Stage 3: Windfall Assessment**

**4.43** The following section discusses whether an allowance needs to be made for larger windfall sites i.e. those which have not been specifically identified as available for housing but have unexpectedly come forward and have subsequently been identified as having potential or have been granted planning permission. Local authorities have traditionally made 'allowances' for windfall sites when demonstrating the supply of land in their areas, to reflect the fact that sites continually come forward despite not being specifically allocated in the local development plan or being identified as part of the supply within studies such as the SHLAA.

**4.44** As mentioned in paragraph 70 of NPPF, a windfall allowance may be justified as part of the housing land supply if there is compelling evidence that such sites will continue to provide a reliable source of supply. The allowance must be realistic and the results of this SHLAA exercise, historic windfall delivery rates and expected future trends will assist in determining this.

**4.45** Oldham does not have a Site Allocations DPD and the only specific housing allocations comprise of a limited number of allocated sites which were brought

forward from the 2006 UDP. Therefore, for Oldham, a “windfall” is defined as a site that, at the time that planning permission was granted for housing, had not previously been a housing allocation or had not appeared on a previous list of sites that made up the housing land supply (as part of the SHLAA or partial update of this).

- 4.46** There will always be sites coming forward for housing which have not previously been specifically identified as having housing potential. The nature of these (for example, changes of use, conversions or sub-divisions of existing buildings, relocation of existing businesses which frees up land for other uses and so on) can often mean that their redevelopment is difficult to anticipate in advance, especially if they are relatively small.
- 4.47** For the 2017 SHLAA update an analysis of “windfall” sites was undertaken using the base date of the previous published SHLAA of 1 April 2012<sup>15</sup>. It was found that a significant number of dwellings had been granted on such sites over this five-year period. However, as a full SHLAA had not been carried out for five years prior to 2017 it was expected that several sites had come forward in this time which had not previously been identified as having potential for housing in 2012. More recently, as monitoring practices have intensified and the SHLAA is now fully updated annually, the number of dwellings coming forward on “windfall” sites is significantly less. Therefore, there is not adequate evidence available to justify a “windfall” allowance at this time. Instead, it is important to ensure that an annual update of the SHLAA is carried out as it forms the most accurate method for anticipating future sources of housing land. This position will be kept under review.

#### ***Approach to small sites in the planning system***

- 4.48** 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. Sites with planning permission or under construction are identified within the five-year supply as explained below.

#### ***Garden Land***

- 4.49** NPPF states that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.
- 4.50** In previous years, the small sites allowance has been calculated using past delivery trends for small sites, including garden land development. It was considered

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<sup>15</sup> It is not possible to accurately analyse trends prior to 2012 due to monitoring practices prior to this year not being aligned with current practices.

appropriate to include garden land small site development because for several years the number of small sites coming forward on garden land was relatively significant in terms of the overall small site supply. However, over the past five years the number of dwellings coming forward on garden land has been minor, compared to the overall small site supply (less than 5% of the overall small sites supply). As such, to accurately reflect trends in small site delivery within the borough, and to align with NPPF, garden land development has been excluded from the small site supply since 2020/21. This position will be kept under review in line with available evidence.

**4.51** The allowance rate is based on an analysis of housing completions on small sites over a five-year period 1 April 2018 to 31 March 2023. This shows that 366 homes have been completed on small sites in this period (around 15% of all completions over this time – 2,429 homes), equating to an average of 73 homes per annum. As the allowance is based on small sites completions over a five-year period, garden land developments remain part of the small sites calculations for the three years prior to 2020/21, but are excluded from 2020/21, 2021/22 and 2022/23, as set out above.

**Table 5 Housing Completions on sites producing less than 5 dwellings 01/04/2018 to 31/03/2023**

Year	Total completion on sites under 5 dwellings
2018/19	109
2019/20	71
2020/21	73
2021/22	72
2022/23	46
<b>TOTAL</b>	<b>366</b>
<b>Average p.a</b>	<b>73</b>

**4.52** Any small sites allowance would only be applied from year 6 as small sites are already included in years 0-5 (where it is known they have planning permission or are under construction). Account must be taken of any small sites that are already in the post-five year supply and the capacity of these sites must be subtracted from the allowance in order to ensure there is no double-counting. In previous years, a number of small sites were included in the post-five year supply (mainly those with a lapsed permission) but these have now been removed and the allowance will apply.

**4.53** Table 5 shows that, based on the average number of homes delivered over the past five years on small sites, there could be an allowance of 803 dwellings applied from 1 April 2028 to 31 March 2039.

## Clearance Allowance

- 4.54** Similar to having an allowance for additional dwellings that are not already accounted for, an estimate needs to be made of how many dwellings may be cleared or lost from the housing land supply. The capacity of sites in the SHLAA shows a net figure which already takes account of demolition and replacement. For example, if one house is demolished and replaced by two, the capacity would only show a net gain of one; or if two dwellings are converted into one, a net loss of one would be recorded. However, there are also circumstances where dwellings are cleared or lost but are not replaced by new residential development. For example, houses cleared to make way for wider non-residential redevelopment or through change of use of a dwelling to another use. In previous years, large scale renewal schemes have led to relatively high clearance rates but, more recently, most clearance/loss is on a very small scale.
- 4.55** 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. In the 2020 and 2021 SHLAA updates an additional clearance allowance was applied to account for the large-scale demolition and redevelopment of Crossbank and Summervale House, Vale Drive, Oldham (site reference HLA3860). The redevelopment involved a net loss of around 162 homes, as such an additional clearance allowance was included for the housing land supply positions for 1 April 2020 and 1 April 2021. As the demolition of the site occurred in December/ January 2021/22, the additional clearance has been removed and the standard clearance allowance has been reverted to for the 1 April 2022 and 1 April 2023 housing land supply position.

**Table 6 Clearance / loss of dwellings 01/04/2018 to 01/04/2023**

Year	No. of dwellings included in permissions resulting in clearance/loss <sup>16</sup>	Has the loss taken place (no. of dwellings lost)?
2018/19	10	9
2019/20	8	4
2020/21	3	3
2021/22	4	1
2022/23	13	3
<b>TOTAL</b>	38	20
<b>Average p.a.</b>	7.6	4

- 4.56** Table 6 shows that clearance/loss of dwellings to other uses has been minimal over the last five years, with 38 dwellings being granted permission for change of use or demolition and only 20 actual losses. A relatively small clearance

<sup>16</sup> Not including sites where cleared dwellings are replaced by new dwellings.

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allowance of minus 6 dwellings a year has therefore been applied, as an average of both permissions granted for demolition/ change of use and the actual losses. This will be reviewed in future SHLAAs as appropriate.

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## 5 Findings

### *Results of the Assessment*

**5.1** The sites within the SHLAA are split into different categories depending on their planning status, position within the housing land supply and the level of assessment required within the SHLAA:

- Sites under construction (remaining capacity as at 01/04/23);
- Sites with extant residential planning permission as at 01/04/23;
- Saved housing allocations (UDP Phase 1 and 2);
- Lapsed and stalled housing sites;
- Potential/ pending sites;
- Discounted sites.

**5.2** All sites and broad locations are placed within one of the above categories and the assessment then determines how many homes are likely to be delivered on each site (if any) and when. This calculation then informs the housing trajectory to determine short and long-term housing potential across the borough.

**5.3** *Please note that these findings are based on the housing land supply position as at 1 April 2023. Whilst it has been informed by the latest information available during its preparation, inevitably, the status of many of the sites included in the SHLAA will have changed by the time it is published. Changes will be picked up in future updates of the SHLAA.*

### *Breakdown of Housing Land Supply*

See Appendix 1a for full listing of sites.

**5.4** The tables below provide a summary of the capacity of sites in the overall land supply. Table 7 shows a summary of the housing land supply by ward and the following tables break the supply down by site category. Further detail and an explanation of the categories of sites in the SHLAA is set out in the following section.

**Table 7 Housing Land Supply Ward Summary<sup>17</sup>**

Ward	Total Dwellings Years 0-5 (2023-2028)	Total Dwellings Years 6-10 (2028-2033)	Total Dwellings Years 11-16 (2033-2039)	Total Dwellings Years 17+ (2039+)	Total Dwellings (all periods)
Alexandra	109	95	22	0	226
Chadderton Central	234	0	384	0	618
Chadderton North	14	40	6	0	60
Chadderton South	108	108	136	0	352
Coldhurst	210	960	593	0	1,763
Crompton	1	17	0	0	18
Failsworth East	85	353	0	0	438
Failsworth West	284	99	225	0	608
Hollinwood	149	203	241	0	593
Medlock Vale	327	275	25	0	627
Royton North	82	85	52	0	219
Royton South	165	355	80	0	600
Shaw	492	980	52	0	1,524
St James'	184	180	712	376	1,452
St Mary's	64	630	1,231	176	2,101
Saddleworth North	197	76	114	0	387
Saddleworth South	77	209	38	0	324
Saddleworth West & Lees	223	158	0	0	381
Waterhead	71	148	282	0	501
Werneth	126	245	0	0	371
<b>TOTAL</b>	<b>3,202</b>	<b>5,216</b>	<b>4,193</b>	<b>552</b>	<b>13,163</b>

<sup>17</sup> See appendix 1b for a full breakdown of sites by ward and SHLAA web map for spatial distribution.

### **Sites Under Construction**

**5.5** Table 8 shows sites within the supply that have received planning permission and this permission has been implemented i.e. a material start has been made to the development of the site. The capacity figure quoted is the remaining number of dwellings yet to be completed as at 1 April 2023. Sites in this category will be at different stages in the construction process, ranging from sites where some dwellings have been completed and are already occupied to those which have just started groundworks.

**5.6** Table 8 shows that there were 1,241 dwellings available on 123 sites that were under construction as at 1 April 2023. Sites in this category are included in the current five-year housing land supply. This includes 3 dwellings within the wider Phase 2 Housing Allocation HLA0029 Ashton Road, Woodhouses which received planning permission in January 2020 and were under construction, although nearing completion, at 1 April 2023.

**Table 8 Sites Under Construction**

SHLAA Category	Total Dwellings 2023-2028	Total Dwellings 2028-2033	Total Dwellings 2033-2039	Total Dwellings 2039+	Total Dwellings - All Periods
Sites under construction	1,241	0	0		1,241

### **Sites with an Extant Planning Permission**

**5.7** Table 9 shows sites within the supply that had an extant (current) full or outline planning permission, or prior approval for residential development (including mixed use sites), as at 1 April 2023. It shows that there were 1,936 dwellings available on 172 sites with an extant planning permission for housing at 1 April 2023.

**Table 9 Sites with Extant Planning Permission**

SHLAA Category	Total Dwellings 2023-2028	Total Dwellings 2028-2033	Total Dwellings 2033-2039	Total Dwellings 2039+	Total Dwellings - All Periods
Sites with extant planning permission	1,476	460	0		1,936

**5.8** Sites in this category are included in the current five-year housing land supply if they have a full planning permission or prior approval for residential or, for sites with only outline permission, there is evidence to suggest they will be delivered within five years. For larger sites it is expected that, based on the delivery rate, some dwellings will be delivered beyond year 5.

### Saved UDP Housing Allocations

- 5.9** This category includes those sites that have been specifically allocated for residential development in whole, or as part of a mixed-use scheme, 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 saved UDP housing allocation policy sets out that Phase 1 housing allocations are considered to be a priority for development.
- 5.10** Some of the UDP allocations are included in the five-year supply if there is evidence to suggest they are deliverable in the short term, such as Phase 1 Allocation HLA2090 Land at Oldham Road/ Hardman Street and HLA0112 Land at Knowls Lane, which are included in the five-year supply as they currently have extant planning permission for residential. The remaining Phase 1 sites have been placed in the post five-year housing land supply. Phase 2 housing allocations are those that were considered to be developable in the medium to long term and are therefore included in the post five-year supply, mainly in the long term.
- 5.11** Phase 1 Allocation HLA2090 Land at Oldham Road/ Hardman Street and Phase 2 Allocation HLA0112 Land at Knowls Lane, are included within the Extant Planning Permission category, given their current planning status. The remaining portion (48 homes) of HLA0029 Ashton Road (Woodhouses) remains within the UDP Phase 2 category as only 3 dwellings have extant permission and were under construction as of 1 April 2023. Phase 2 Allocation HLA2093 Medlock Road, Woodhouses was completed during 2022/23.
- 5.12** All allocations will be subject to a comprehensive review as part of the Local Plan review, although they are not fully assessed in this SHLAA they are considered capable of being delivered within the short, medium and long term. Table 10 shows that there were 546 dwellings available on 13 remaining housing allocations without permission as at 1 April 2023. This includes 7 dwellings on sites considered deliverable in the short term and 536 dwellings on sites considered deliverable in the medium to long term.

**Table 10 Saved UDP Housing Allocations**

SHLAA Category	Total Dwellings 2023-2028	Total Dwellings 2028-2033	Total Dwellings 2033-2039	Total Dwellings 2039+	Total Dwellings - All Periods
Saved UDP Phase 1 Housing Allocations	7	358	0	0	365
Saved UDP Phase 2 Housing Allocations	0	181	0	0	181
Total Saved UDP Housing Allocations	7	539	0	0	546

## Lapsed and Stalled Sites

- 5.13** This category includes sites that have previously had planning permission for housing but where this has expired before being implemented. It also includes “stalled” sites which are classed as those that have been granted permission and construction has begun (or a material start has been made) but where there has been no development activity for at least five years.
- 5.14** Only those sites identified as being capable of delivering 5 dwellings or over have been specifically identified in the SHLAA. Any lapsed or stalled site less than 5 dwellings are not included but their capacity is accounted for through the small sites allowance (see paragraph 4.49). There is a general presumption that sites within this category remain deliverable, unless there is a known constraint which would impede their future development.
- 5.15** Table 11 shows that there were 716 dwellings available on 36 sites in this category. Of these, 508 dwellings are considered deliverable within the medium term and 147 in the long term. Although they have the advantage of previously receiving planning permission for housing, sites that are considered deliverable in the longer term are generally those that have been lapsed or stalled for some time. This could suggest that there may be some issue with the immediate viability of the sites. If they require a new planning permission, they would also need to be reconsidered against more recent national and local planning policy.

**Table 11 Lapsed and Stalled Sites**

SHLAA Category	Total Dwellings 2023-2028	Total Dwellings 2028-2033	Total Dwellings 2033-2039	Total Dwellings 2039+	Total Dwellings - All Periods
Lapsed and Stalled sites >5 dwellings	61	508	147	0	716

## Potential/ Pending Sites

- 5.16** 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).
- 5.17** This category also includes 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 (these sites will have a ‘POT/PEND’ status). Some of these sites may have been identified in this category as ‘Potential sites’ in previous SHLAA assessments.
- 5.18** On the whole, these sites are considered unconstrained in relation to significant policy or physical limitations. Please note that the term “unconstrained” relates to the sites’ general suitability rather than their deliverability. Some of the sites in this category may have some development issues that will need to be fully assessed and resolved before they

could receive planning permission and be developed.

**5.19** The category includes some sites that are currently in other uses, such as employment but there are reasons to assume that housing could be achievable on the site at some point in the future. Reasons which may make such a site suitable include:

- the site has been suggested as potential housing land through the Call for Sites process as the owner has indicated they have plans to relocate their business;
- it is within an existing residential area;
- land adjacent or close to the site has been granted permission for housing and this may have changed the character of the area;
- it is not fully occupied or is no longer fit for purpose to meet modern business needs or practices;
- circumstances have changed which mean that a former use is no longer viable or appropriate.

**5.20** As set out above, some sites in this category have recently gained or are likely to gain planning permission for housing in the short term, including:

- SHA0120 The Hollies, Wellington Road, Oldham (FUL/348093/21) - application pending decision for 32 dwellings;
- SHA0899 London Road, Derker and SHA1630 Former Cromford Mill (FUL/350118/22) – application pending decision, also includes HLA2664 within the Lapsed & Stalled category, for 132 dwellings in total.
- SHA1080 Our Lady’s RC High School, Roman Road, Royton (FUL/349943/22) - planning permission for 46 dwellings granted after the monitoring period (June 2023);
- SHA1665 Ivy Mill, Failsworth (FUL/349416/22) - application pending decision for 98 apartments (part-conversion).

**5.21** For the purposes of this SHLAA, these sites remain in the “Potential/ Pending” category as this is the status they had at 1 April 2023.

**5.22** For most of the sites their capacity is counted within the current five-year supply and, depending on development progress, they will move into the “Sites with Extant Planning Permission” or “Under Construction” category from 1 April 2024. In some cases, some of these sites may be identified in the medium term where there are constraints to address, or it is considered that development may take slightly longer. Additionally, there are some potential sites where there may be no policy restrictions preventing them from coming forward in the short term, or which have evidence of deliverability in the short term. These may also form part of the five-year supply.

**5.23** Table 12 shows that there were 6,243 dwellings available on 95 “Potential/ Pending” sites as at 1 April 2023. Of these, 417 dwellings are considered deliverable in the short term (2023-2028) (those with, or pending, planning permission, or evidence of deliverability in the short term); sites which have the

potential to provide 2,410 dwellings are considered deliverable in the medium term (2028-2033) and sites providing 3,240 dwellings are considered to have potential in the longer term (2033-2039).

**5.24** In addition, 176 dwellings are considered to be deliverable post 2039, on three sites – 88 dwellings on SHA1057 Alliance and Britannia Mill Triangle; 60 dwellings on SHA2129 Land at Regent Street, Wallshaw Street & Bell Street; and 28 dwellings on SHA0021 Land between Prince Street, Oldham Way and Mumps Metrolink stop (former Mumps site). This is due to anticipated build out rates and the potential requirement for wider infrastructure or regeneration needed to bring these sites forward. It should be noted that the supply is indicative and as such other sites may be delivered post 2039 due to the reasons given above.

**Table 12 Potential Sites**

SHLAA Category	Total Dwellings 2023-2028	Total Dwellings 2028-2033	Total Dwellings 2033-2039	Total Dwellings 2039+	Total Dwellings - All Periods
Potential Sites	417	2,410	3,240	176	6,243

### **PfE Allocations**

**5.25** PfE identifies Strategic Allocations for housing and employment land within Oldham. Strategic Allocation policies for each site can be viewed within PfE<sup>18</sup>. As set out above, unlike previous years, the housing land supply set out within this SHLAA includes the PfE Strategic Allocations. In previous years, some sites within the PfE Strategic Allocations were included if they had received planning permission, such as:

- HLA3862 Cowlshaw Abbatoir, Shaw which is part of PfE Allocation JPA16 Cowlshaw and received planning permission (RES/346720/21) in January 2022 for 201 dwellings. The site is now under construction; and
- HLA3966 Land to the south of Denbigh Drive, Shaw which is part of PfE Allocation JPA16 Cowlshaw and received planning permission (FUL/346529/21) in May 2022 for 42 dwellings. The site is now under construction.

**5.26** HLA3862 and HLA3966 are now included within the ‘Under Construction’ category and are identified within the five-year supply. A planning application (FUL/347760/21) is also pending decision (subject to legal agreement) for 30 dwellings at JPA13 Bottomfield Farm (Woodhouses).

**5.27** Given the advanced stage of the PfE Plan<sup>19</sup>, it is considered appropriate to include the remaining allocations within the supply looking forward from April 2023. The indicative timescales for the delivery of these sites set out in the supply are based on initial

<sup>18</sup> Chapter 11 of Places for Everyone Composite Version: Modifications Version 2023, available at: [https://www.greatermanchester-ca.gov.uk/media/8565/composite-pfe-plan\\_sep2023-reduced-file-size.pdf](https://www.greatermanchester-ca.gov.uk/media/8565/composite-pfe-plan_sep2023-reduced-file-size.pdf)

<sup>19</sup> The GMCA submitted PfE for examination on 14 February 2022. Independent Inspectors were appointed, and examination hearings were held between November 2022 and July 2023. Main Modifications to the Plan put forward during the examination have recently been consulted upon and are now being considered by the Inspectors alongside representations submitted to the consultation.

concept planning work undertaken as part of the PfE evidence base. This will be updated as appropriate, as further masterplanning work is undertaken on some of the larger allocations, in future SHLAA updates. Whilst some of the smaller allocations may be able to come forward sooner, many of the larger allocations will require significant supporting infrastructure and masterplanning, and as such, all of the PfE allocations, excepts parts of allocations which have received planning permission/ are under construction, are placed in the medium to long term supply. There are 1,299 dwellings identified within the medium term (2028-2033) and 806 dwellings identified within the long term (2033-2039).

**5.28** Approximately 376 dwellings are expected to be delivered at JPA14 Broadbent Moss post 2039, which will require appropriate phasing and supporting infrastructure given the scale of the allocation which is for around 1,450 dwellings<sup>20</sup>.

**5.29** As the allocations come forward, they will be identified in the relevant SHLAA category dependent on their planning status i.e. extant planning permission/ under construction etc.

**Table 13 PfE Allocations**

SHLAA Category	Total Dwellings 2023-2028	Total Dwellings 2028-2033	Total Dwellings 2033-2039	Total Dwellings 2039+	Total Dwellings - All Periods
PfE Allocations	0	1,299	806	376	2,481

### *Annualised Housing Land Supply*

**5.30** Figure 1 below summarises the annualised housing land supply up to the end of the plan period (2039) and beyond<sup>21</sup>. It also shows the sources of sites (site category) which make up the housing land supply over this period.

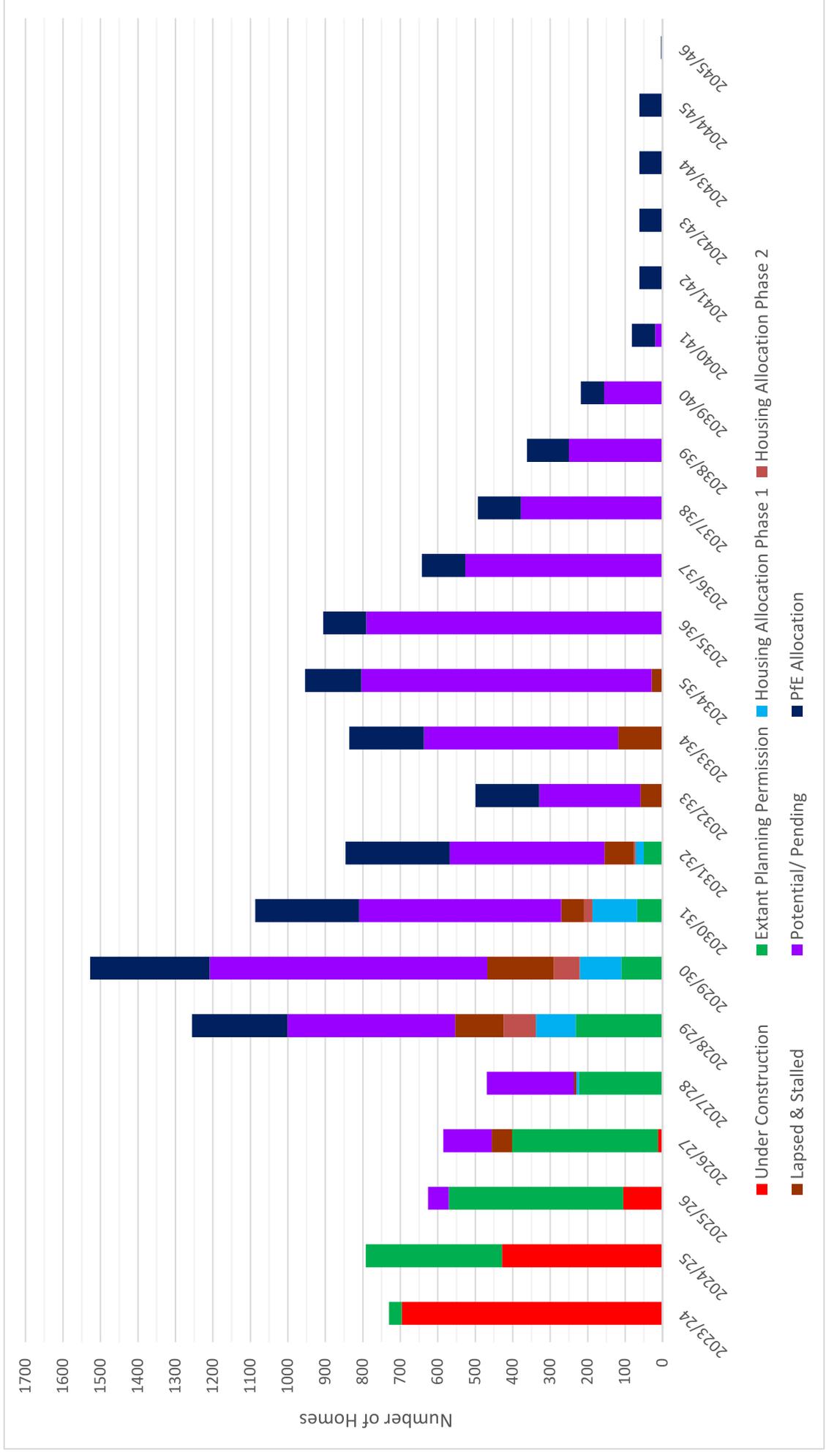
**5.31** Figure 1 shows that for the first five years, up to 2028, the housing land supply is primarily made up of under construction sites, sites with extant planning permission, and, to a slightly lesser extent, potential/ pending sites and lapsed and stalled sites. The middle of the plan period, between 2028 to 2033, is primarily made up of sites with extant planning permission, potential/ pending sites, PfE strategic allocations and lapsed and stalled sites. The majority of the remaining UDP housing allocations are also anticipated to come forward in this middle period. The latter part of the plan period, between 2033 and 2039, and post 2039 is made up of potential sites, PfE strategic allocations and lapsed and stalled sites only.

**5.32** The anticipated supply is reflective of how sites typically progress from gaining planning permission through to completion, however it highlights the importance of maintaining and regularly updating the SHLAA to ensure an evidenced supply of housing is maintained as sites move through this process.

<sup>20</sup> This is the total allocation capacity, however 77 dwellings at Hebron Street within the allocation boundary, were completed in February 2022.

<sup>21</sup> See Appendix 1a for the full annualised supply.

**Figure 1 Annualised Housing Land Supply (as at 1 April 2023) by Site Category**



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## *Location of sites*

- 5.33** Appendices 1 to 3 set out the location of all sites identified within the SHLAA. Appendix 1a presents the housing land supply sites based on the site category, Appendix 1b presents the housing land supply sites based on the ward in which they are located. These are accompanied by an overall borough map showing all the sites spatially in Appendix 2. Appendix 3 provides a more detailed assessment of each “Potential/Pending” site identified as part of the SHLAA 2023. The sites are also shown spatially on the [SHLAA web map](#), where the site details can also be viewed.
- 5.34** Increasing the number of homes within Oldham Town Centre is a key priority of Oldham’s Creating a Better Place Framework. The SHLAA identifies 3,462 homes as being deliverable in the short to long term within Oldham Town Centre. Of these, 130 homes are identified within the short term (2023-2028); 1,401 homes are identified within the medium term (2028-2033); 1,755 homes are identified within the long term (2033-2039); and 176 homes are identified within the post plan period (post 2039).
- 5.35** The SHLAA identifies 125 homes within the borough’s other centres as being deliverable in the short to long term, including:
- 49 homes within Shaw Centre;
  - 14 homes within Royton Centre;
  - 6 homes within Chadderton Centre;
  - 6 homes within Uppermill Centre; and
  - 50 homes within Hill Stores (Huddersfield Road) Centre.
- 5.36** There are currently no homes identified within Lees and Failsworth Centres in the SHLAA, however there are sites within close proximity to these centres.

## *Discounted sites*

- 5.37** The SHLAA has attempted to identify as wide a range as possible of sites and broad locations for consideration. Sites which have particular policy constraints have been included within the assessment to test the appropriateness of previously defined constraints. There were 204 discounted sites identified - the list is set out in Appendix 4.
- 5.38** 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 subdivided into several categories depending on the reasons for discounting.
- 5.39** 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. For some of the sites, the term “constrained” mainly relates to the sites’ current suitability for housing rather than deliverability and there may be some potential for the site to come forward in the future if circumstances were to change. This is especially the case for those sites which would need to be assessed more fully in the context of a strategic review of employment land and open space provision. Other sites may have potential but are not currently considered available. Some, however, are likely

to remain unsuitable, for example if they are significantly affected by Flood Zone 3b or are physically inaccessible.

### ***Discounted – Business and Employment Areas and Saddleworth Employment Areas***

- 5.40** The current Local Plan identifies established employment areas known as Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs). These were designated for employment-generating uses, aiming to help meet the needs of the local economy and provide opportunities for investment. The policy for these employment areas permits uses which fall within business and industrial uses.
- 5.41** As these sites are considered to provide important employment land, any site identified through the potential sources review (see methodology chapter) which falls within the boundaries of a BEA or SEA has been automatically discounted. This is unless it is considered that the loss of the site to housing would not have a detrimental effect on the remainder of the employment area or wider economy. If this is the case, the site may appear in the “potential” category (see individual site assessments in Appendix 3) where it meets the criteria for inclusion

### ***Discounted – Existing Employment***

- 5.42** These are sites which do not fall within an established BEA or SEA but are currently in active employment use or are within a wider commercial/industrial area and are considered to provide an economic function. As with the BEAs and SEAs, such sites are considered to provide important employment land which should be protected.
- 5.43** Generally, this is also the case for mills which are fully occupied, are in good condition and where it is considered most appropriate for them to remain in employment use. Any existing employment site where circumstances suggest they could be an appropriate housing site have been identified in the “potential” category (see individual site assessments in Appendix 3).
- 5.44** As mentioned earlier, the established employment areas and other employment land will be subject to a full assessment which will be set out in the forthcoming Employment Land Review. This will help inform future suitability of employment land for other uses and it may be through this process that more sites are included in the housing land supply.

### ***Discounted - Other Protected Open Land (OPOL)***

- 5.45** As far as possible, the SHLAA has identified relevant land outside the existing Green Belt for consideration. This includes designated OPOL land which is currently protected from large scale development through Local Plan policy. As with employment land, OPOL will be subject to a full assessment as part of the emerging Local Plan Review, to determine whether it should remain as protected land (under an amended policy designation).
- 5.46** It is considered that appraisal of the suitability for housing of any current OPOL through this SHLAA would be premature. Therefore, OPOL has been discounted

until the findings of the LGS review are considered through the Local Plan Review process, including through the Site Allocations work. Any OPOL which forms part of a PfE allocation has been assessed separately as part of the evidence base for PfE.

### ***Discounted – open space***

- 5.47** The SHLAA has considered several existing open space sites, some of which are in council ownership which have been identified for consideration through an asset review. Some of these sites are considered surplus to stock and are identified for possible disposal at some point in the future.
- 5.48** Overall, existing open spaces are not considered suitable for development unless there are circumstances which suggest that housing could be appropriate. For example, the site may be a cleared housing site which was intended for future redevelopment, pending a suitable proposal coming forward. In terms of future suitability, these sites will be subject to a wider review of open space provision, which will look at the relationship between future housing requirements, existing spaces and consequent open space needs.

### ***Discounted – Green Belt***

- 5.49** Identified sites (such as those submitted through Call for Sites) which fall within the existing Green Belt have been discounted as development of such sites would not comply with national policy. Green Belt sites which are brownfield and are otherwise considered compliant with national policy may continue to come forward through the planning system and in some cases may appear in the "potential" category. Those Green Belt sites which form part of the PfE allocations are assessed separately.

### ***Discounted – other***

- 5.50** Some sites have been discounted due to other policy and / or physical constraints which would make development inappropriate. Reasons include being located in an area which is incompatible with housing, falling below the size/capacity threshold for inclusion and being within Flood Zone 3b.

### ***Potential capacity from discounted sites***

- 5.51** Table 13 identifies the potential capacity from the discounted sites if the identified in-principle constraints could be removed. This shows that there could be 10,794 dwellings available on 125 sites which are currently discounted as at 1 April 2023 (not including discounted Green Belt sites). These figures show that the potential from constrained sites could be significant.
- 5.52** However, it must be borne in mind that the capacity is based only on an indicative estimate using a standard density of 35 dwellings per hectare multiplied by the net developable area of the site (between 80-90% of the total site area). If any of these sites were to be developed, the true capacity would likely reflect the fact that not all the land would be developed or be physically suitable, particularly for OPOL or Open Space sites.

- 5.53** The indicative capacity of discounted Green Belt sites has not been included in Table 13 as the capacity of these sites is very difficult to estimate given the extensive size of some of the sites and the potential site constraints that may be present given the Green Belt nature of the land. Therefore, an assessment of suitability cannot be determined and as such an indicative capacity is not provided.
- 5.54** Whilst some of the sites may come forward as “windfalls” over future plan periods or further assessment may determine that they could be suitable, most are likely to remain in their current use and/or will continue to be regarded as unsuitable for housing and only a small proportion of this capacity will be achieved.

**Table 13 Discounted sites - potential capacity**

Discounted Site Category	Number of sites	Indicative capacity
Sites in BEAs/SEAs	36	1,199
Other active employment sites	28	1,225
Discounted OPOL (this includes all OPOL, some of which is considered undevelopable e.g. river valley)	26	7,589
Discounted existing open space	19	493
Discounted other	12	386
Discounted Green Belt	83	N/a
<b>TOTAL</b>	<b>204</b>	<b>10,794</b>

#### **Update on SHLAA 2022 sites**

- 5.55** Appendix 5 provides an update on sites that were part of the housing land supply in the previous published SHLAA (as at 1 April 2022) but no longer appear in this report. This may be because the site is now built out or they are no longer available/ suitable for housing. It should be noted that some sites may have moved between categories rather than no longer being included e.g. a previous “potential” site may have received planning permission or may now be on the discounted list. Furthermore, the removal of a site from the SHLAA which had previously been included, does not prejudice that site coming forward for housing, being granted planning permission for housing or being re-considered for its inclusion in future SHLAAs. The SHLAA is an assessment of suitable, available and achievable housing land at a point in time and is therefore subject to change.

## 6 Housing Trajectories

- 6.1** This section of the report provides some information on dwelling completions in recent years and examines the envisaged completion rates up to 2039 and beyond.
- 6.2** The Department of Levelling Up, Housing and Communities (DLUHC) (formerly Ministry of Housing and Local Government (MHCLG)) introduced a new methodology for calculating local housing need<sup>22</sup>. As the Local Plan is more than five years old, as per paragraph 74 of the NPPF, the local housing need calculation (standard methodology) applies when calculating Oldham's five-year supply. Oldham's current local housing need based on the standard methodology is now 703 new homes per year. This applies from the publication of the latest affordability ratios in April 2023.
- 6.3** The standard methodology housing requirement represents a significant increase on the adopted housing requirement of 289 new homes per year as set out in the current Local Plan.
- 6.4** As set out in section 2 and 3 above, during the PfE examination hearings, the Inspectors requested that the PfE authorities consider a potential modification to the submitted plan period of 2021-2037 to a plan period of 2022-2039, and subsequently an amendment to the stepped housing requirement, as a result. It was considered that this plan period better aligns with the timeline for preparation of the Plan. The proposed amended plan period for PfE (how many years the plan will cover) is 17 years – 2022-2039<sup>23</sup>.
- 6.5** As part of this proposed modification to the plan period, the housing requirement for Oldham set out in the PfE Plan (Publication Plan August 2021) 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 772 homes in years 11-17 (2030-2037) has been modified to:
- 404 homes per year for 2022-2025;
  - 680 homes per year for 2025-2030, and
  - 772 homes per year for 2030-2039.
- 6.6** The stepped requirement still equates to an average of 680 homes per year. Across the plan period the total housing need for Oldham is 11,560, including a buffer to provide flexibility. As such, whilst the annual average requirement and total requirement remains the same, the stepped requirement figures have changed slightly to align with the modified time periods.
- 6.7** The following section presents Oldham's current five-year and post five-year housing land supply trajectory, against the standard methodology housing requirement and the proposed PfE stepped housing requirement for the borough for years 1-5 (2023-2028).

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<sup>22</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

<sup>23</sup> See Places for Everyone Plan Composite Version: Modifications Version 2023, available at: [https://www.greatermanchester-ca.gov.uk/media/8565/composite-pfe-plan\\_sep2023-reduced-file-size.pdf](https://www.greatermanchester-ca.gov.uk/media/8565/composite-pfe-plan_sep2023-reduced-file-size.pdf)

**6.8** The housing trajectories take account of all sites identified in the housing land supply set out in the SHLAA for years 1-5 and beyond and shows the net additional dwellings which are expected over this time period. It takes account of projected clearance (which is 6 dwellings per annum up to 2039) and the small sites allowance of 73 dwellings per annum (applied from year 6 up to 2039). No allowances are applied beyond 2039.

### **Recent completions**

**6.9** Table 14 and Figure 2 below provide information on the number of housing completions over a 12-year period between 2011/12 to 2022/23. Table 14 shows the number of net completions since the adoption of the Core Strategy (Local Plan) in 2011, compared to the housing requirement (either the adopted Core Strategy housing requirement or the Standard Methodology requirement) which applied for that year. The adopted Core Strategy Housing Requirement of 289 new homes per year applied from 2011/12. In 2018/19 the Standard Methodology for Calculating Local Housing Need was introduced and will apply until the adoption of Places for Everyone (which will set out Oldham’s housing requirement)<sup>24</sup>.

**6.10** The housing requirement based on the Standard Methodology is significantly higher than the adopted Core Strategy requirement and requires a step-change in housing delivery. However, housing delivery is increasing in the borough. The most recently published Housing Delivery Test (HDT) results for 2021 were published on 14 January 2022. As per the latest measurement, Oldham has delivered 91% of its housing need over the past three years (2018/19 to 2020/21)<sup>25</sup>. A measurement for 2022 has not been published to date.

**Table 14 Housing Completions 2011/2012 to 2022/23 compared to Housing Requirement**

Year	Completed (Net)	Housing Requirement	Variance (against housing requirement)
2011/12	11	289	-278
2012/13	257	289	-32
2013/14	363	289	74
2014/15	594	289	305
2015/16	296	289	7
2016/17	374	289	85
2017/18	345	289	56
2018/19	410 <sup>26</sup>	692	-282

<sup>24</sup> See Indicator 11 of the [Authorities Monitoring Report \(2022/23\)](#) for full completions data.

<sup>25</sup> <https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement>

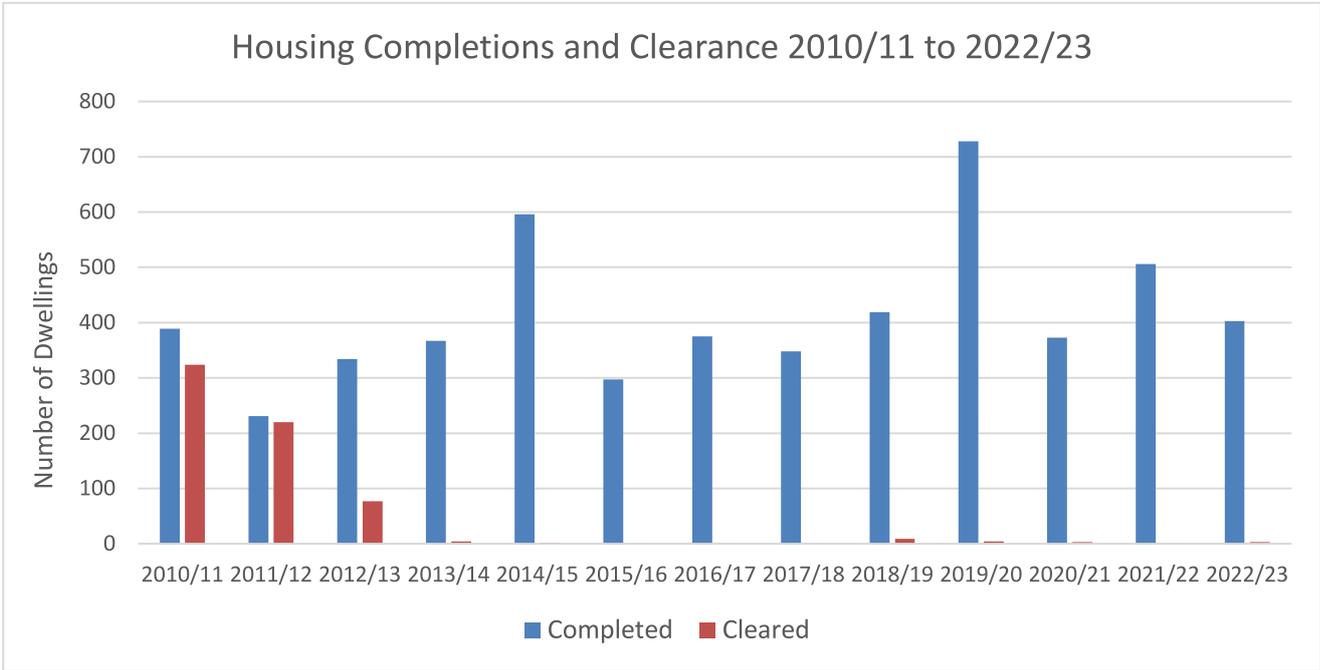
<sup>26</sup> This is the actual completions figure for 2018/19. Official DLUHC housing returns show a higher figure of 502 for 2018/19. Previous revisions are explained within the 2018/19 monitoring report.

Year	Completed (Net)	Housing Requirement	Variance (against housing requirement)
2019/20	728	692	36
2020/21	373	693	-320
2021/22	506	683	-177
2022/23	403	705	-302

**6.11** As shown by figure 2 (overleaf), the number of net completions has fluctuated over the last twelve years. After falling in 2015/16, completions increased again from 2016/17 as several larger sites began construction. Prior to this there were high levels of clearance that took place due to regeneration activity during 2003/04 to 2012/13, along with the changing economic conditions witnessed since 2008/09 that may have had an effect. Completions for 2020/21 were significantly lower than the previous year 2019/20 and the current year of 2021/22. It is likely that the impact of Covid-19 and wider socio-economic issues may have contributed to the lower completions for 2020/21. However, on average over the last ten years (2013/14 to 2022/23), completions have improved, with an average of 439 dwellings being completed annually.

**6.12** The number of completions, net of clearance, for 2022/23 was 403 dwellings. This brings the total number of completions for 2011/12 to 2022/23 to 4,660 dwellings. Whilst the table shows a residual of 302 to be delivered against the requirement for 2022/23, the standard methodology takes into account past under delivery of housing within the local housing need calculation. Therefore, this residual is already accounted for and does not need to be delivered in addition to meeting the standard methodology housing need.

**Figure 2 Housing Completions Compared to Clearance**



## Five-Year Housing Land Supply

**6.13** In terms of assessing the identified five-year supply against the potential future housing requirement, indicator 11 of the Monitoring Report provides a full breakdown<sup>27</sup>. In summary, however, table 15 sets out the housing land supply as of 1 April 2023 compared to the housing requirement as set out by the Standard Methodology and compared to the proposed housing requirement set out in PfE, as explained in paragraph 6.5 above.

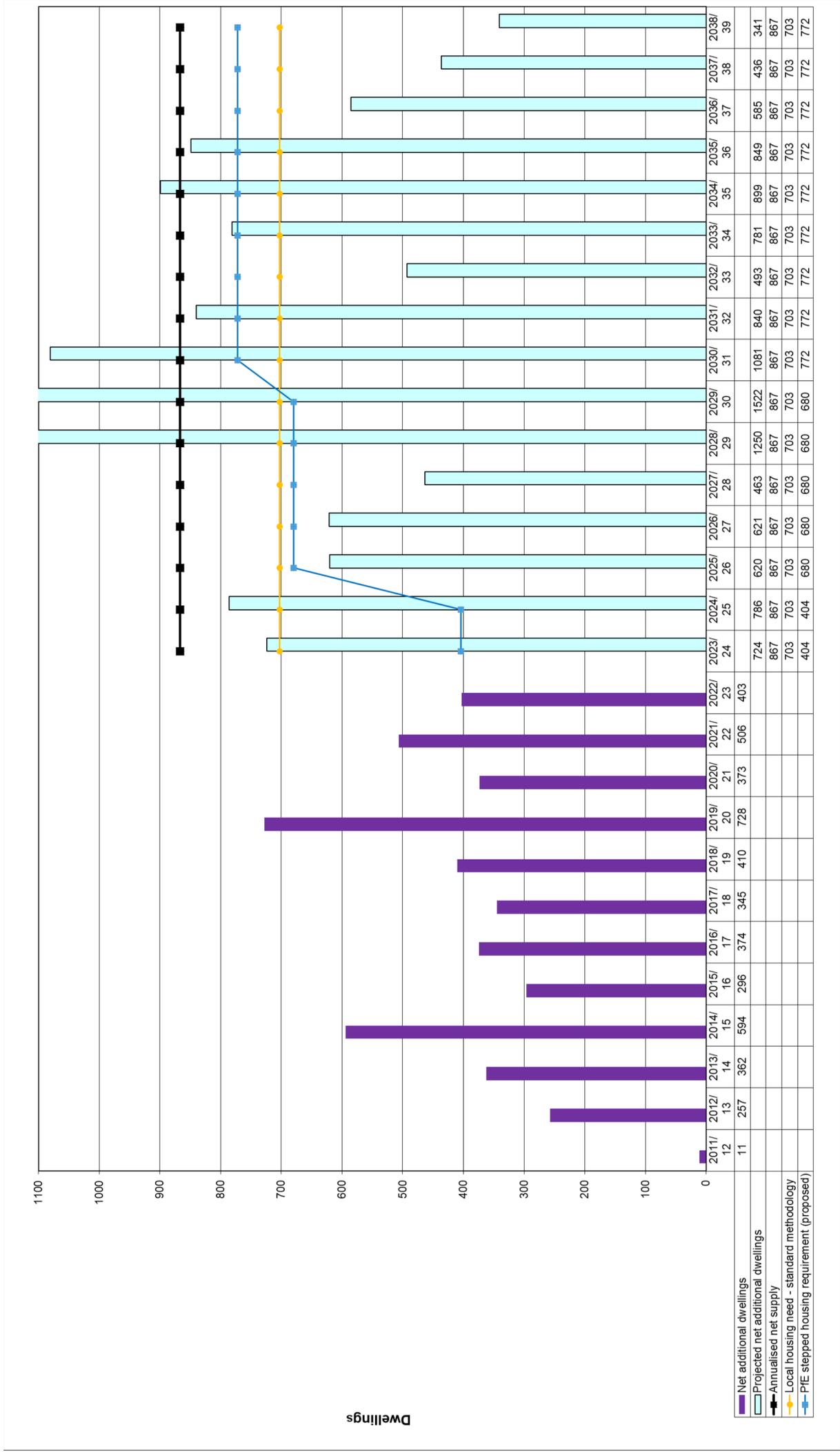
**Table 15 Housing Land Supply 2023 compared to Housing Requirement**

	Housing requirement as per the standard methodology	Places for Everyone housing requirement
Houses required per year	703	570 <sup>28</sup>
Total houses required for five-year period (including accounting for clearance)	3,515	2,850
Total housing supply for five-year period (2022-2027)	3,202	3,202
Supply as a % of housing requirement	90%	111%
Supply expressed in years	4.5	5.5

<sup>27</sup> Indicator 11 of the [Authorities Monitoring Report \(2021/22\)](#), pages 19-22.

<sup>28</sup> The PfE housing requirement is the five-year average of the remaining two years of the stepped requirement of 404 homes per year which apply to 2022-2025 and three years of the stepped requirement of 680 homes per year which apply to years 2025-2030.

Figure 3 Housing Land Supply Trajectory (as at 1 April 2023)



- 6.14** To better align with PfE housing land supply monitoring, since the publication of the previous SHLAA (as at 1 April 2022) the housing land supply has been identified on an annual basis and as such has informed this trajectory.
- 6.15** Whilst this is indicative, compared to past completions the above trajectory (figure three) illustrates that there is expected to be an increase in the annual average completion rate over the next five years (2022/23 to 2027/28) with 3,172 net completions over this period (taking account of expected clearance). This equates to an annual average of 634 dwellings over this five-year period and reflects the assumed delivery of sites that are either currently under construction or have an extant planning permission, together with other identified sites that are expected to come forward in the short term. Overall, the housing land supply equates to an annual average projected supply of 867 dwellings per year for the period of 2023/24 to 2038/39.
- 6.16** As is identified by table 15 and figure 3, the five-year housing land supply as at 1 April 2023 (2023-2028) represents 90% of the total housing required for this period as per the standard methodology housing requirement. This equates to a 4.5 year supply of housing. This reflects the challenge that meeting the standard methodology housing requirement presents for Oldham and meeting it will require a step-change in housing delivery. This is difficult as whilst we can identify potentially suitable, available and achievable sites, the council has limited influence on the delivery of the majority of these sites, which is often determined by private developers.
- 6.17** Compared to the proposed stepped housing requirement set out within PfE, the five-year housing land supply as at 1 April 2023 (2023-2028) represents 111% of the total housing required for this period. This equates to a 5.5-year supply of housing. This is sufficient to meet the stepped requirement and provides an appropriate flexibility allowance to allow for changes in supply and/or delivery.

### ***Post Five-Year Supply***

- 6.18** The trajectory indicates that a further 9,961 dwellings are expected to be delivered beyond five years (including 552 dwellings expected to be delivered beyond 2039, as set out in section 5 above). These are expected on sites that would either require a full or reserved matters application, a new planning application, construction would need to resume or, for potential sites, be granted planning permission for housing.

### ***Previously Developed Land***

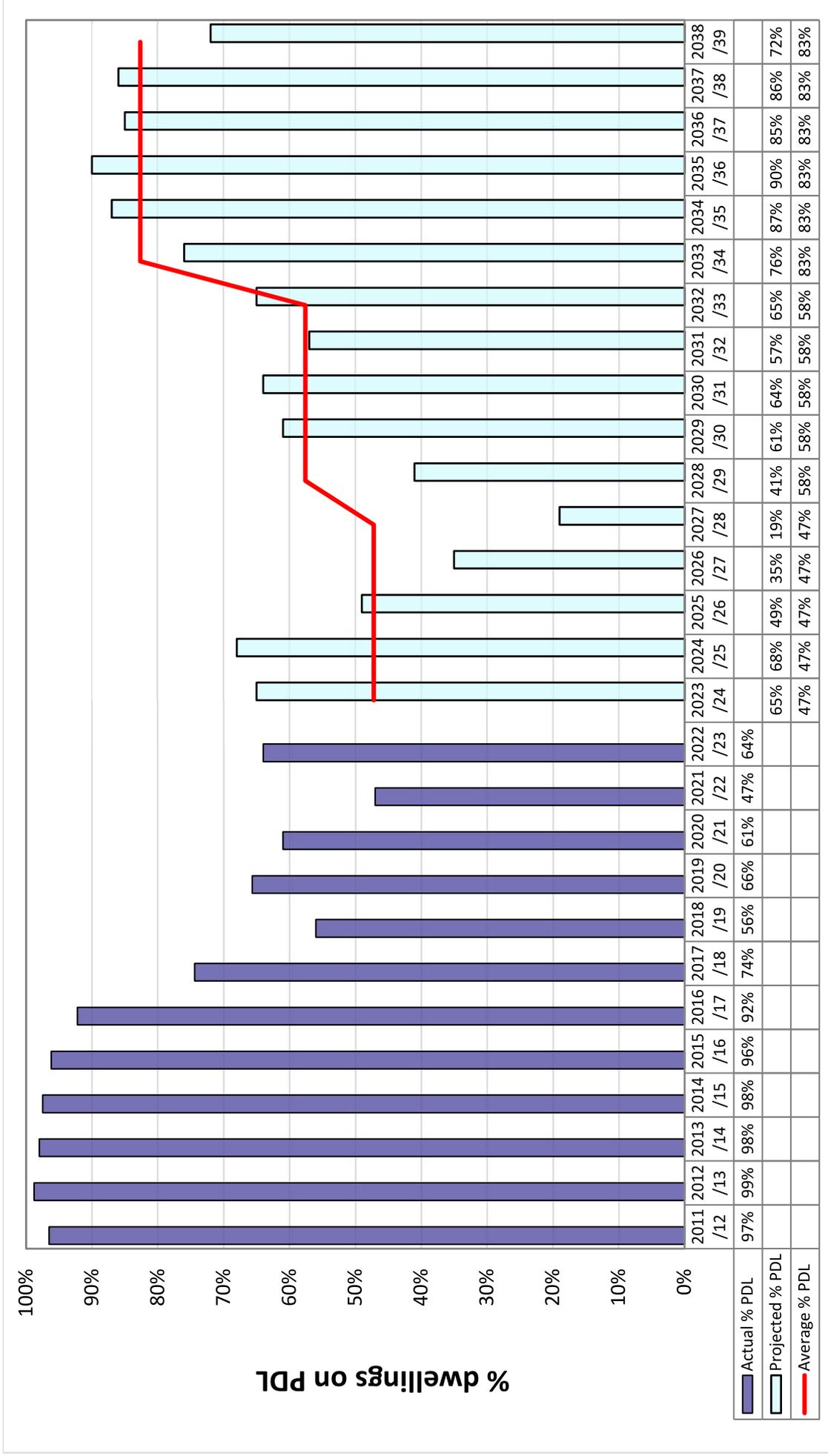
- 6.19** In 2022/23, 64% or 259 dwellings were completed on previously developed land in Oldham. This is higher than the previous year (47%). An additional 113 dwellings were also delivered on mixed sites (containing both brownfield and greenfield land) - therefore 92% of all dwellings completed in 2022/23 were on PDL or mixed sites. Greenfield sites only accounted for 9% (9 sites) of all sites (104 sites) with plot completions during 2022/23. Brownfield and mixed sites still make up the majority of sites within the housing land supply.
- 6.20** The previously developed land (PDL) trajectory (figure 4) shows:

- 
- Projections for the next five years (2023-2028) show that 47% of the five-year housing land supply is on PDL;
  - Overall, an average of 71% of all dwellings identified as part of the borough's potential housing land supply are on PDL.

**6.21** The PDL projections relating to the housing land supply do not include dwellings delivered on sites that are a mixture of greenfield and brownfield land within the site. The five-year housing land supply includes a further 894 dwellings on mixed sites (28% of the five-year supply). The post five-year housing land supply includes 1,018 dwellings on mixed sites (11% of the post five-year supply).

**6.22** In total 75% of the five-year housing land supply and 81% of the post five-year housing land supply is made up of previously developed land or mixed sites.

Figure 4 Previously Developed Land Trajectory (as at 1 April 2023)



## 7 Conclusion

- 7.1** This SHLAA report provides a snapshot of the housing land supply position as of 1 April 2023. The housing land supply is constantly evolving with new sites gaining permission, sites being completed and potential land coming forward. As such, the SHLAA will be reviewed regularly to capture changes which have taken place since the publication of the previous report.
- 7.2** The SHLAA process also provides an opportunity for stakeholders to be involved in shaping the land supply position. Suggestions for additional sites are welcomed, alongside the provision of additional information on any of the existing sites contained within the SHLAA.
- 7.3** Oldham's current local housing need based on the DLUHC Standard Methodology is for 703 new homes per year. Projected clearance is considered within the SHLAA and will need to be met on top of the housing need figure.
- 7.4** The standard methodology housing requirement represents a significant increase on the adopted Local Plan housing requirement of 289 new homes per year. Whilst the SHLAA demonstrates that there is sufficient potential housing land currently available over the plan period, with the majority of this being brownfield, there will be a need to identify further land to demonstrate a five-year supply of deliverable housing land against the standard methodology housing requirement.
- 7.5** A consultation<sup>29</sup> on the main modifications to the PfE Joint Development Plan that were put forward during the Examination in Public (which ran from November 2022 to July 2023) has recently concluded. The Inspectors will now consider the representations submitted during the consultation and issue their final report in due course. Upon adoption PfE will set out Oldham's housing requirement for the plan period. PfE proposes a stepped housing requirement for Oldham of 404 homes per year for 2022-2025, 680 homes per year for 2025-2030, and 772 homes per year for 2030-2039<sup>30</sup>. This equates to an annual average of 680 new homes per year. As per the stepped requirement the housing land supply identified in this SHLAA would be sufficient to meet the requirement for the first five years and the remainder of the plan period.
- 7.6** See separate documents for appendices:

**Appendix 1a SHLAA Schedule of Sites by Category**

**Appendix 1b SHLAA Schedule of Sites by Ward**

**Appendix 2 Borough Map of Housing Land Supply**

**Appendix 3 Detailed Potential Site Assessment Tables**

**Appendix 4 SHLAA Discounted Sites**

**Appendix 5 Update on 2022 SHLAA Sites**

<sup>29</sup> Consultation on main modifications ran from 11 October 2023 to 6 December 2023.

<sup>30</sup> As set out in the [Places for Everyone Plan Composite Version: Modifications Version 2023](#), table 7.2, page 174.