

OLDHAM'S REPLACEMENT UNITARY
DEVELOPMENT PLAN

TOPIC PAPER

HOUSING

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CONTACT: LEN HARRIS, STRATEGIC
PLANNING AND INFORMATION SECTION
(0161 911 4163)

CONTENTS	PAGE No.
1. Introduction	3
2. Issues for the Inquiry	4
3. National and Regional Policy Context	5
4. Local Policy Context	11
5. Draft Replacement Unitary Development Plan Housing Strategy	14
6. Draft RUDP Housing Requirement and Supply – An Overview of Policies H1, H1.1 and H1.2	16
7. Response to Issues Raised By Objectors	30
8. Conclusion	37
Appendix 1 Technical Information	38
Appendix 2 Documents referred to in the Topic Paper	44
Appendix 3 Status of Draft RUDP Phase 1 housing allocations	45
Appendix 4 Summary of proposed Pre-Inquiry Changes to to housing policies	48

1. INTRODUCTION

1.1 The Revised Deposit Draft Replacement Unitary Development Plan (RUDP) contains a range of housing policies covering the following topics:

- the scale and location of future housing development;
- the treatment of future windfall sites;
- the density of housing developments;
- housing mix;
- the provision of affordable housing and sites for Gypsies and Travelling Showpeople ; and
- the provision of lifetime homes.

1.2 The purpose of this Topic Paper is to explain the Plan's approach to issues of housing land requirement and supply. The following policies are therefore covered in this paper:

- H1 – Housing Land Requirement and Supply,
- H1.1 – Housing Land Release – Phase 1, and
- H1.2 – Housing Land Release – Phase 2.

1.3 In relation to policies H1.1 and H1.2, this paper will not cover issues specific to particular sites, rather these two policies are included here in order to appreciate the general strategy behind the release and phasing of allocated sites.

1.4 The remainder of this paper is divided into 6 sections as follows:

Section 2 sets out a summary of issues raised by objectors to the above three policies.

Section 3 summarises the national and regional policy background against which the above three policies have been developed.

Section 4 summarises the local policy context for the RUDP housing policies.

Section 5 summarises the Draft RUDP strategy in so far as it pertains to the policies covered by this paper.

Section 6 provides a more detailed overview of the development of policies H1, H1.1 and H1.2.

Section 7 provides the Council's response to issues raised by objectors.

Section 8 provides a conclusion to the paper.

Appendix 1 is the technical appendix containing tables of figures.

Appendix 2 provides a list of documents referred to in this paper.

Appendix 3 is a table tracing what has happened to each Phase 1 Draft RUDP housing allocation.

Appendix 4 contains a summary of the pre-inquiry changes.

2. ISSUES FOR THE INQUIRY

2.1 Although it is not the purpose of this paper to deal with objections raised by specific objectors, it is intended to refer to the policy issues raised and provide the Council's response. Responses to specific objections raised by objectors will be covered in separate proofs of evidence as appropriate. This paper does not cover site specific objections.

2.2 Policy related issues raised by objectors to H1, H1.1 and H1.2 can be summarised as follows:

H1 - Housing Land Requirement and Supply

- a. the housing requirement is too low and additional housing land should be allocated;
- b. the brownfield target is too high;
- c. the windfall and small sites allowances are too high;
- d. the clearance strategy is unclear/simplistic and under estimates future clearance levels;

- e. vacant dwellings should not be deducted from the clearance allowance;
- f. reoccupation of vacant dwellings should not count towards the housing requirement; and
- g. Supplementary planning documents should not be used as part of the phasing mechanism.

H1.1 Housing Land Release – Phase 1, and H1.2 Housing Land Release – Phase 2

- a. the housing allocations are unlikely to provide a choice of good quality housing;
- b. there is too much housing development planned in Saddleworth. Housing development will have a negative impact on Saddleworth villages; and
- c. some objectors express a general uncertainty about the availability of allocated sites.

3. NATIONAL AND REGIONAL POLICY CONTEXT

3.1 It is the Council's view that policies H1, H1.1 and H1.2 reflect key aspects of national and regional guidance as expressed in Planning Policy Guidance Notes (PPGs) and Regional Spatial Strategy for the North West (RPG13). The following provides a summary of the relevant key points contained in the guidance, considered most appropriate to the development of these policies.

Planning Policy Guidance Note 3: Housing (2000)

3.2 Planning Policy Guidance 3 (PPG3) is the primary national source of guidance on planning for new housing development. PPG3 sets out the Government's objectives for the provision of housing. These can be summarised as follows:

- a. everyone should have the opportunity of a decent home;
- b. there should be a greater choice of housing that does not reinforce social distinctions;
- c. the housing needs of all the community should be recognised, including those in need of affordable or special housing;
- d. more sustainable patterns of development should be promoted with better use made of existing previously developed land; and
- e. new housing and residential environments should be well designed and should make a significant contribution to promoting urban renaissance and improving the quality of life.

Housing Land Requirement

- 3.3 Paragraph 7 states that regional planning guidance (now regional spatial strategy) will set the overall provision to be made for housing in the region, and its distribution. PPG3 adds that in preparing unitary development plans, authorities must have regard to this regional guidance but should avoid, wherever possible, re-opening consideration of the level of housing provision for their areas.

Plan, Monitor and Manage

- 3.4 It is a clear that monitoring housing land requirements and supply forms a central plank of the policy set out by PPG3. Rather than “predict and provide”, local authorities and regional bodies are encouraged to have regard to a range of factors in determining the appropriateness of the planned level of housing and its distribution.

Re-Using Urban Land and Buildings

- 3.5 The Government is committed to maximising the re-use of previously developed land and empty properties and the conversion of non-residential buildings for housing in order both to promote regeneration and minimise the amount of greenfield land being taken for development. To emphasise this commitment to re-using previously

developed land and buildings, PPG3 advises that unitary development plans should set their own target for the proportion of additional housing to be provided on previously developed land or through the conversions of existing buildings. Such targets should be set having regard to those set at the national and regional level.

Identifying Areas and Sites

- 3.6 Paragraphs 30 and 31 of PPG3 are key pieces of advice that are central to the allocation of sites. Paragraph 30 urges local authorities to follow a “sequential approach” to the allocation of land, instigating a search sequence that prioritises the re-use of previously-developed land and buildings. In following the sequence, local authorities need not consider all of the land in their area and should not extend the search further than required to provide sufficient capacity to meet the appropriate housing requirement.
- 3.7 PPG3 adds further guidance in paragraph 31 which states that in deciding which sites to allocate for housing, local planning authorities should assess their potential and suitability for development against each of the following criteria:
- a. the availability of previously developed sites and empty or underused buildings and their suitability for housing use;
 - b. the location and accessibility of potential development sites to jobs, shops and services by modes other than the car, and the potential for improving such accessibility;
 - c. the capacity of existing and potential infrastructure, including public transport water and sewerage, other utilities and infrastructure (such as schools and hospitals) to absorb further development and the cost of adding further infrastructure;
 - d. the ability to build communities to support new physical and social infrastructure and to provide sufficient demand to sustain appropriate local services and facilities; and

- e. the physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account that such risk may increase as a result of climate change.

Releasing Land for Development

- 3.8 In determining the order in which sites identified should be developed, PPG3 states the presumption will be that previously developed sites (or buildings for re-use or conversion) should be developed before greenfield sites. The exception to this principle will be where previously developed sites score so poorly in relation to the criteria listed in PPG3 paragraph 31 as to preclude their use for housing (PPG3, paragraph 32). This general approach to site selection is reflected in the Draft RUDP Strategy. The guidance goes on to promote the use of phasing as a part of the plan, monitor and manage approach to the release of land for housing development (PPG3 paragraph 33).

Windfalls

- 3.9 Windfall sites are those that have not been specifically allocated through the local plan process.
- 3.10 Paragraph 36 of PPG3 states that authorities should make allowances for all the different types of windfalls in their plans. Allowance should be made on the basis of examining past trends in windfalls coming forward for development and on the likely future windfall potential as assessed in a capacity study. PPG3 makes it clear that no allowance should be made for the development of greenfield windfall sites, although this does not necessarily preclude the grant of planning permission on such sites.

Creating Sustainable Residential Environments

- 3.11 The creation of sustainable residential environments is at the core of the advice in PPG3 and government planning policy in general. PPG3 is

clear that local authorities should promote this objective in a number of ways, including:

- a. promoting development that is linked to public transport, for example by exploiting opportunities to locate larger housing developments along good quality public transport corridors;
- b. promoting mixed use development, for example by allocating mixed-use sites with a residential element; and
- c. promoting the most efficient use of land - PPG3 advises that local planning authorities should avoid developments of less than 30 dwellings per hectare and encourage developments between 30 and 50 dwellings, whilst seeking greater intensity of development at places with good public transport accessibility (PPG3 paragraph 58).

Regional Spatial Strategy for the North West (RPG 13)

3.12 The overriding aim of Regional Spatial Strategy (RSS) for the North West is to promote sustainable patterns of spatial development and physical change. Chapter 2 of RPG13 sets out the Core Development Principles that should inform spatial and development planning across the Region in order to achieve sustainable development. Policy DP1 states that development plans should adopt the following sequential approach to meeting development needs:

- a. the effective use of existing buildings and infrastructure within urban areas, including the re-use or conversion of empty buildings;
- b. the use of previously-developed land, particularly that which is accessible by public transport, walking or cycling; and then
- c. the development on previously undeveloped land, where this avoids areas of important open space, is well located in relation to houses, jobs, other services and infrastructure and is or can be made accessible by public transport, walking or cycling.

3.13 In terms of spatial development, RSS for the North West states that a significant proportion of development and urban renaissance resources of the Region should be focussed on the North West Metropolitan Area, which includes, amongst others, the ten unitary authorities in Greater Manchester. Paragraph 3.7 states that in this area the emphasis should be on encouraging new development and redevelopment of good quality which will provide a significant portion of the new and better housing and other development required to cope with the anticipated household growth in the Region. It adds that this development should be accommodated without encroaching on the following: Green Belt areas, areas of nationally and internationally recognised ecological importance, or other open land that is protected for its agricultural, amenity, recreation or wildlife value.

3.14 Chapter 5 of RSS introduces the key means of delivering the urban renaissance required within the Region, with a focus on issues such as health and education, housing provision, transport, urban green space and the recycling of land and buildings. Policy UR4 sets targets for the recycling of land and buildings. The regional target is that 70% of new dwellings, including conversions, constructed in the region from April 2002 should use previously developed land and existing buildings in sustainable locations in line with the approach to development set out in Core Development Principles and the Spatial Development Framework. The policy recognises that there are variations across the Region and therefore the policy sets several sub-regional targets which local planning authorities should take account of in preparing their development plans. The figure set for Oldham is at least 80%.

3.15 Policy UR7 and the supporting text outlines the approach to regional housing provision. Table 5.1 sets out the distribution of regional housing provision expressed as an annual average rate of housing provision for each county and unitary authority. This table shows that

Oldham is expected to provide an annual average rate of housing provision, net of clearance, of 270 dwellings.

3.16 A review of Regional Spatial Strategy for the North West has begun, with a timetable that sees a first draft published for consultation in Summer 2005. If the review results in change to the housing policies, then the appropriate action will be taken to address it.

3.17 At a sub-regional level, the policy context is provided by the Greater Manchester Strategic Planning Framework, and A Strategy for Greater Manchester. The Greater Manchester Strategic Planning Framework was reviewed in 1999 by the Association of Greater Manchester Authorities (AGMA), to inform the review of Regional Planning Guidance for the North West (as it was then known) and the review of Greater Manchester Districts' unitary development plans. The vision and spatial planning framework set out in the Framework encompass:

- a. a focus on the sustainable regeneration of urban areas,
- b. the promotion of well designed, compact, energy efficient, mixed use, sustainable neighbourhoods, and
- c. a holistic approach to urban renewal, which includes improving the quality of the housing stock and housing choice, providing affordable housing and improving the quality of housing areas.

3.18 A Strategy for Greater Manchester was published by AGMA in 2003 and provides a ten to fifteen year vision for the future of the sub-region. It sets out eight themes for the conurbation, of which the most relevant in this context is Creating Sustainable Communities. Of the key actions proposed, that with the most direct relevance to the housing policies of the Draft RUDP is to promote innovative, high quality, sustainable design solutions in neighbourhoods and in the replacement of the housing stock;

4. LOCAL POLICY CONTEXT

Housing Market Renewal (HMR)

- 4.1 In 2002 the Government announced that Oldham and Rochdale Borough Councils would be invited to develop a joint Housing Market Renewal (HMR) pathfinder initiative. Oldham and Rochdale have been chosen, along with eight other areas in England, as an area where intervention within the housing market may be required in order to address problems of low demand in housing.
- 4.2 The stated aim of the Partnership is,
“to deliver a transformation in the housing markets in our area that will create sustainable communities and lead to greater community cohesion” (Transformation and Cohesion, the Housing Market Renewal Prospectus for the Oldham and Rochdale Pathfinder, December 2003).
- 4.3 In order to achieve this overall aim, the Pathfinder has agreed five objectives. These are:
- a. To transform the housing choices available to meet current and future demand and support economic growth, by providing modern attractive homes in sustainable neighbourhoods through clearance of obsolete property, remodelling of existing property and redevelopment of other areas.
 - b. To improve the image, safety and attractiveness of neighbourhoods so people will be proud to live there and choose to invest.
 - c. To achieve and sustain an excellent standard for existing retained housing, focusing especially on priority neighbourhoods.
 - d. To improve substantially the quality of life of local people by increasing employment and leisure opportunities, and transforming their educational attainment and health.

- e. In all that we do, we will work towards achieving community cohesion: creating places where a range of people ... can live happily together.

(Transformation and Cohesion, HMR Prospectus for the Oldham and Rochdale Pathfinder, December 2003)

- 4.4 The lifetime of the Pathfinder is expected to be 15 years. The Prospectus estimates that during this period, some 6,000 dwellings will be cleared across the Partnership, but, crucially, an even greater number of new dwellings – some 7,000 - will be developed.
- 4.5 At the time of writing, funding to implement a housing market renewal strategy within Oldham has only been granted for the first two years (2004-2006) of the programme and applies to proposals in the two Wave 1 areas of Derker and Werneth/Freehold.
- 4.6 The HMR Partnership has recently appointed consultants to produce a strategy for what will become a bid for funding for the second wave of HMR Masterplans in Oldham. Funding has been set aside nationally for the period April 2006 to March 2008 and a decision on the amount that Oldham and Rochdale will receive is expected in the autumn of 2005.

Oldham's Community Strategy 2002 – 2022.

- 4.7 The Community Strategy was published in 2002 to improve coordination, identify common priorities and clear goals, and share responsibility for achieving them between all members of the Local Strategic Partnership. It is currently under review with a revised Strategy due for publication early in 2005.
- 4.8 Priorities for action are set out for several areas of activity, including Housing and the Environment and Transport. Under the former, the

Strategy sets out the Partnership's aim over the next twenty years to create a confident and thriving housing market, which provides diversity of choice to meet the needs and aspirations of all who wish to reside in the Borough. Under both topics, the visions have at their core the theme of providing good standard accommodation for people who wish to live in the Borough.

- 4.9 Since the publication of the 2002 Community Strategy, the Local Strategic Partnership and the North West Development Agency have commissioned the consultancy Urbed to undertake a visioning exercise for the whole Borough. Draft reports have been published for public consultation. Some of the ideas stemming from the visioning work will be taken up in the review of the Community Strategy. However, planning policy aspects will need to be incorporated into development plan documents planned for future preparation.

5. DRAFT REPLACEMENT UNITARY DEVELOPMENT PLAN (RUDP) HOUSING STRATEGY

- 5.1 Policies H1, H1.1 and H1.2, have been drafted to achieve the management of land for housing in a way that will match the needs and demands of the population with the development of sustainably located homes.

- 5.2 The Draft RUDP Housing chapter sets out 9 policy objectives. Of these, the following act as a good summary of the aims of policies H1, H1.1 and H1.2:

- a. to encourage the development of new housing stock in locations that meet the need to encourage more sustainable living patterns;
- b. to ensure that efficient use is made of land identified for housing development;
- c. to make it a priority to re-use previously developed land;

- d. to provide for a spread of housing sites across the Borough;
- e. to contribute towards the urban regeneration of the Borough and Greater Manchester as a whole;
- f. to make the best use of existing building stock;
- g. to encourage the development of a variety of house types and sizes, including affordable housing and upper market housing, that reflect housing needs and demands in the Borough and in a manner consistent with delivering the Plan's sustainability objectives; and
- h. to support objectives set by the Housing Market Renewal Fund Pathfinder.

5.3 These objectives have been progressed through policies H1, H1.1 and H1.2 by:

- a. establishing a housing requirement for Oldham of 270 dwellings p.a. (net) in accordance with RPG13 (Policy H1);
- b. establishing a "brownfield" target of at least 80% in accordance with RPG13 (Policy H1);
- c. planning for the phased release of allocated sites so as to ensure that housing provision is managed in accordance with local, regional and planning objectives and to give greater priority to the release of well located previously developed land (Policies H1, H1.1 and H1.2); and
- d. allocating sites for development with an emphasis on those which are:
 - well located in relation to the urban area, public transport links and access to basic services;
 - spread throughout the Borough but with an emphasis on sites which are well related to the existing built-up area and the boundary of the Housing Market Renewal Pathfinder;
 - on previously-developed land, particularly within Phase 1;

- existing mill buildings suitable for conversion; and
- capable of contributing towards meeting HMR objectives.

5.4 It is the Council's view that this approach to housing land policy is consistent with the above key aspects of national and regional planning guidance.

6. DRAFT RUDP HOUSING REQUIREMENT AND SUPPLY – AN OVERVIEW OF POLICIES H1, H1.1 AND H1.2

6.1 The Council has made a number of pre-inquiry changes which affect significant elements of policies H1, H1.1 and H1.2. The following overview is largely based on these policies as amended by the proposed pre-inquiry changes, which are to be considered by the Council on 24th November 2004 (see Appendix 4 for summary).

Policy H1 – Housing Land Requirement and Supply

6.2 Policy H1 is at the core of the Draft RUDP housing chapter. The purpose of this policy is to:

- a. Set the annual housing requirement;
- b. Indicate how clearance will be dealt with for the duration of the plan period, and how this affects the amount of land that needs to be allocated;
- c. Set the target for the reuse of previously-developed land;
- d. Set the basis for phasing allocated sites;
- e. Set the basis for establishing priorities for housing land release beyond; 2006 and in the long term; and
- f. Set the basis for monitoring the housing policies of the plan.

Annual Housing Requirement

6.3 Policy H1 sets the Council's net housing requirement according to that established by RPG13.

6.4 At First Deposit stage, RPG13 had only been published in draft form. Consequently, Policy H1 incorporated the draft RPG13 housing

requirement of 320 dwellings (net) and added to this a clearance allowance of 80 dwellings p.a. Subsequently, the final RPG13 included a reduced housing requirement of 270 dwellings p.a. (net) and it is this figure which forms the core of Policy H1 in the Revised Deposit Draft RUDP.

6.5 Regional Spatial Strategy states that these annual rates of provision should apply from April 2002 to 2006. However, it adds that where development plans are reviewed and the new plans extend beyond 2006, they should continue to provide for additional dwellings at the same annual average rate until such time as any different rate is adopted following review of RPG.

6.6 Policy H1 states that the plan makes provision for a net increase of 270 dwellings per annum over the period 2003 to 2011. For the purposes of the RUDP, it is assumed that the annual rate will be applied from year 2006 to 2011 in accordance with RPG13. However a review of RSS, including policies governing housing provision, is currently underway. The rate of provision set out in the Draft RUDP will therefore be applicable until the review of RPG has been completed. It is the Council's intention to publish a Local Development Document dealing with the implications of this review for housing policy as a priority.

Clearance

6.7 RSS establishes a housing provision that is expressed as being net of housing clearance. The need to build new housing to replace cleared dwellings is additional to the RSS requirement.

6.8 The clearance rate set out in the First Deposit Draft RUDP was 80 dwellings p.a. as of mid-2001. It was acknowledged in the Plan that this rate was significantly below that achieved in prior years, although a significant number of previous demolitions involved Council property –

a situation which, it was felt at the time, would be unlikely to be repeated given the level of resources then available. The level of clearance within the private sector was, at the time, restricted to the renewal areas of Westwood and Glodwick, with some potential clearance anticipated in the Single Regeneration Budget Round 6 regeneration area centred on Werneth and Hollinwood, and in the Fitton Hill/Hathershaw New Deal area.

6.9 The granting of Housing Market Renewal (HMR) Pathfinder status to Oldham, however, has fundamentally altered the policy environment within which clearance issues are being considered. Even so, the Revised Deposit Draft RUDP retained the 80 dwellings p.a. clearance estimate, acknowledging that this was an interim position pending clarification of the intentions of the HMR Pathfinder, which had, at that time, yet to produce an approved prospectus detailing its plans. There was, therefore, no certainty of funding levels for future clearance.

6.10 The HMR prospectus was finally presented to the Government in December 2003, a short time after the end of the revised deposit period. Details of the overall objectives of the Pathfinder have been detailed above.

6.11 Although funding to implement a housing market renewal strategy in Oldham has only been granted for the period 2004-2006 and applies to the Wave 1 project areas of Werneth/Freehold and Derker, it is clear that clearance activity in the Borough over the next fifteen years is likely to be significantly focussed on areas within the Pathfinder.

6.12 The Prospectus estimates that total clearance in the two Wave 1 areas will reach some 1,062 dwellings over a five-year period (2004 to 2009). Although it is likely that clearance will be higher in Oldham than Rochdale, accurate estimates of clearance levels beyond those expressed for Wave 1 are not available.

6.13 As part of the Council's Pre-Inquiry Changes, it is stated that if it is assumed that two thirds of clearance will occur in Oldham, then some 4,000 dwellings would be cleared over the likely 15 year lifetime of the HMR Pathfinder (2004 to 2019). A level of clearance on this scale over a fifteen-year period would equate to an average of 267 dwellings per annum.

6.14 However, it is the Council's view that in reality, the potential level of clearance within the Pathfinder will remain under continual review and it is likely that both the level and rate of clearance will vary considerably throughout the lifetime of the HMR project. In particular, the actual delivery of clearance will depend on a number of factors, including:

- a. Future funding levels;
- b. The result of community consultations and of working with local communities to develop proposals;
- c. The residential character of areas subject to clearance proposals;
and
- d. Changes in the housing market.

6.15 It is clear the Housing Market Renewal Fund could have a significant impact on clearance levels over the plan period, leading to clearance levels above the 80 dwellings per annum assumed in the First and Revised Deposit Draft RUDPs. As explained above, however, it is difficult to be precise about the numbers of dwellings realistically likely to be subject to clearance. A precise and reliable annual clearance rate up to 2011 is, therefore, not available.

6.16 Given this high degree of uncertainty, the Council recognises that current and future clearance levels, and their implications for the housing land strategy, will require close monitoring. This is dealt with further below at paragraphs 5.43 and 5.44 on page 26.

Previously Developed Land

6.17 Policy UR4 of RPG13 sets targets for the recycling of land and buildings. In Oldham Borough, on average at least 80% of new housing development should be on previously developed land. Accordingly, this rate has been incorporated in to Policy H1.

6.18 As Table 3 of Appendix 1 shows, the Council is currently meeting the target set out in RSS. Since 2001, an average of 82.5% of completions have been on previously developed land. Phase 1 allocations, as amended by the Council's Pre-Inquiry Changes, consist entirely of previously developed land. The Council, therefore, expects that following the current strategy, it will be able to continue to meet its target for the duration of the plan period. For the last monitoring period of 2003/04, the proportion of development on previously developed land was 84%.

The Phasing of Housing Land Release

6.19 In line with advice in PPG3 relating to the management of housing land, Policy H1 allows for the release of housing land in two phases, the aim being to better manage the rate at which land is developed.

6.20 Sites have been allocated to give preference to:

- a. the re-use of previously developed sites and empty or under used buildings; and
- b. the development of residential sites in locations where jobs, shops and services can be reached without the need to use a car.

6.21 Allocations have also been made in the light of the following factors:

- a. The ability of existing and potential infrastructure, including public transport and physical and social infrastructure, to accommodate additional development;
- b. Development constraints and likely development timescales;
- c. The need to develop residential sites that can provide homes of different types, sizes and levels of affordability; and
- d. The need to support the objectives and programmes of the Housing Market Renewal Fund.

6.22 The annual housing land availability monitoring report will normally provide the first notice of a shortfall in housing land supply and identify the need for consideration to be given to the early release of Phase 2 sites. Where this is the case, the Council will use the criteria set out below to identify those Phase 2 sites that should be considered a priority for early release.

6.23 It is intended that amendments to the phasing of allocated sites will be identified and made public through the publication of a supplementary planning document (SPD). All SPDs will be subject to Council approval and will follow appropriate public consultation on the proposed amendments to the phasing of sites. This consultation will include owners of all phase 2 sites (where known), house builders known to be developing (or known to have an interest) in the Borough, the House Builders Federation and the Council for the Protection of Rural England. Although an SPD cannot formally amend the contents of the Plan itself, it will be a material consideration in the determination of a planning application for residential development on the named site(s).

6.24 It is also intended that the SPD will be used to defer the development of Phase 1 or Phase 2 sites in the event of a substantial oversupply of housing land - for example should several large windfall sites

unexpectedly come forward. Again, this will be an issue that would be identified in the annual monitoring report. Should the deferment of Phase 1 status be necessary, the priority will be to retain those sites that perform best against the criteria set out below. Again, it is intended that a formal process of consultation and publication will be carried out in the manner outlined above.

- 6.25 The use of an SPD as part of a phasing policy is in line with the Government's guidance "Planning to Deliver – The Managed Release of Housing Sites: Towards Better Practice".

Long Term Development

- 6.26 RPG13 does not set a specific end-date for housing land requirements to be met. Instead, the annual housing requirement set by this policy is expected to run until at least 2006 or until a new building rate is set through a review of RPG13. However, the development plan should look beyond current time horizons and consider how priorities for development may manifest themselves in the future. Although other policy objectives must clearly be taken into account, the current intention is that the release of housing land after 2006 will be considered in line with the following criteria, which would also be used to determine the release of Phase 2 sites, or the deferment of Phase 1 sites:

- a. type of site, in order of preference:
 - i) previously-developed sites in the urban area
 - ii) previously-developed sites outside the urban area
 - iii) greenfield sites in the urban area
 - iv) greenfield sites outside the urban area
- b. location, in order of preference:
 - i) inner urban
 - ii) urban extension

- iii) suburban
- iv) village extension

c. public transport accessibility, in order of preference:

- i) very good accessibility - choice of two or three public transport modes, one of which should be a frequent bus route
- ii) good accessibility - within 400m of a frequent bus route, or 800m of a rail or Metrolink station
- iii) satisfactory accessibility - within 400m of a bus route with at least two daytime services an hour Monday to Saturday
- iv) basic accessibility - within 400m of a bus route that operates daytime Monday to Saturday.

d. ready for development, in order of preference:

- i) ready immediately
- ii) ready in 3-5 years
- iii) ready in 5-7 years
- iv) ready in 7 years plus.

6.27 These criteria have been established as a guide for developers and other interested parties. It is not the intention of the Council to introduce a mechanistic approach to the criteria, for example by applying a scoring system by which future proposals will be judged. Rather sites will be treated on their merits and according to the nature of the proposals, but by reference to these criteria and the objectives of the Housing Section of the plan.

Monitoring

6.28 Government planning guidance recommends that a “plan, monitor, manage” approach is applied the release of housing land. This means housing objectives and the way in which they are met must be regularly reviewed. With this in mind the Council will monitor the impact of the

following factors on the objectives set out in the introduction to this chapter:

a. Housing Supply

- i) number of dwellings built
- ii) location of new development
- iii) proportion of dwellings built on previously developed land and through conversions
- iv) number of dwellings built on windfall sites
- v) number of dwellings built on small sites
- vi) the “build-back” rate on residential clearance sites.

b. Development Characteristics

- i) dwelling mix and size according to number of bedrooms
- ii) level and type of affordable housing delivered
- iii) net housing density
- iv) car parking provision.

c. The Housing Context

- i) population and households
- ii) housing need
- iii) condition of housing stock
- iv) areas of low housing demand
- v) clearance activity
- vi) the development of urban regeneration initiatives.
- vii) vacancy rates.

6.29 Future annual housing land monitoring reports will deal specifically with issues arising from HMR in so far as they affect policies and proposals in this chapter. Such reports will consider actual and planned clearance and the potential implications on housing land release, including any implications for the release of Phase 2 housing allocations.

**Policy H1.1 – Housing Land Release – Phase 1, and Policy H1.2
Housing Land Release – Phase 2**

6.30 In achieving the annual average rate of provision required over the Plan period, the Draft RUDP identifies a number of sources of new dwellings, as amended by the Council’s proposed pre-inquiry changes. These are:

- a. Phase 1 housing allocations;
- b. Phase 2 housing allocations;
- c. Dwellings available on sites with an outstanding planning permission as of 31st March 2004;
- d. Dwellings available on sites under construction as of 31st March 2004;
- e. Dwellings available on sites where planning permission is dependent on the signing of a legal agreement as of 31st March 2004;
- f. Dwellings potentially available on future small development sites, expressed as an annual average rate;
- g. Dwellings potentially available on future large windfall site, expressed as an annual average rate; and
- h. New dwellings potentially available owing to the redevelopment of sites which have been cleared of existing dwellings.

6.31 The potential contribution of each of these sources is summarised in Table 1 of the Technical Appendix. The rest of this section considers the various components of the Borough’s housing land supply in further detail.

Allocations

6.32 The UDP housing land supply is divided into two phases established by policies H1.1 and H1.2 respectively. As a result of the pre-inquiry

changes put forward by the Council, there have been a number of amendments to the list of allocations in both phases. In summary, these changes involve:

- a. Updating the allocations to a 31st March 2004 base date. Some allocations have been deleted as they have received planning permission since the publication of the Revised Deposit Plan in October 2003.
- b. Bringing forward four phase 2 sites into phase 1. These sites are:
 - i) Pretoria Road, Oldham;
 - ii) Sandy Mill, Royton (the site boundary for this site has also been extended);
 - iii) Jowett Street, Oldham; and
 - iv) Huddersfield Road/Dunkerley Street, Oldham.
- c. The allocation of two new phase 1 sites which are considered to be key sites falling within the boundary of the Housing Market Renewal Fund. These are:
 - i) Spencer Street, Oldham; and
 - ii) Hartford Mill/Land off Milne Street.

6.33 In total, the revised Phase 1 (Policy H1.1) involves the allocation of 18 sites with an indicative capacity of 1,202 dwellings. The revised Phase 2 (Policy H1.2) consists of 8 sites with an indicative capacity of 408 dwellings.

6.34 Adding the supply in these two phases together gives a total number of 26 sites and 1,610 dwellings.

6.35 The phasing policy has been drafted with the intention that Phase 1 sites will meet short and medium term needs, whilst Phase 2 sites form a pool of sites which may be brought forward in the longer-term, or

sooner in circumstances where monitoring process indicates that there is likely to be a sustained shortfall in the envisaged Phase 1 supply.

Current Commitments – Under Construction or with Planning Permission and sites with an outstanding legal agreement

6.36 As of April 2004 there were a total of 858 dwellings estimated to be available on large sites either under construction, with planning permission or where planning permission is dependent upon the signing of a S106 agreement.

Small Sites Allowance

6.37 The RUDP makes an allowance for dwellings coming forward on small sites (i.e. less than 0.4 ha/10 dwellings) over the Plan period. This allowance is set at 55 dwellings per annum and is based on past trends over the period 1997 to 2001. Table 7 in Appendix 1 shows completions on small sites in period 1997 to 2004. The table shows that the RUDP allowance of 55 dwellings per annum has, on average, been exceeded between 2001 and 2004 (the average is 66 dwellings per annum). Table 6 in Appendix 1 shows that the number of small sites and dwellings forming part of the housing land supply has been increasing year on year between 1999 and 2004.

Windfall Allowance

6.38 Although the RUDP allocates larger sites for development (10 dwellings/0.4 hectares and above) it is expected that non-allocated large sites will continue to come forward for development over the plan period. At First Deposit stage, the RUDP made an allowance for dwellings completions on large “windfall” sites at a rate of 75 dwellings p.a. It was assumed that owing to the lead-in time for sites to gain planning permission and for development to start, completions on large windfall sites would not begin for two years from the Plan's base date

(2001 for the First Deposit RUDP and 2003 for the Revised Deposit RUDP).

6.39 The rate of 75 dwellings p.a. was estimated from average completions on previously developed medium windfall sites (10 to 25 dwellings) and average completions on previously developed large windfall sites (25 dwellings and above), with a discount added to the large windfall average to take into account that larger sites may be less likely to come forward for development (although a small number of large windfall sites could have a significant impact on completion rates). Tables 8 and 9 in the Technical Appendix provide details of completions on medium and large windfall sites over the period 1997 to 2001. The Council has taken a cautious view of likely completions on windfall sites.

6.40 However, the Housing market Renewal Fund is likely to have a significant impact on levels of house building in the Borough and in particular on the potential for larger windfall sites to come forward for development. As a response to the development of HMR policy, the Council has proposed Pre-Inquiry Changes to key employment policies B2.1 Primary Employment Zones and B2.2 Protection of Existing Employment Sites Outside Primary Employment Zones, which give greater potential for residential development to take place in circumstances where previously it would normally have been resisted.

6.41 It is the Council's view that the impact of HMR and these changes is likely to increase the amount of development on large windfall sites. The Council has, therefore, made a pre-inquiry change increasing the windfall allowance from 75 to 100 dwellings p.a. An urban capacity study update is currently underway and will report in January 2005.

6.42 In accordance with paragraph 36 of PPG3, no allowance has been made for greenfield windfall sites, although, again, PPG3 does not expressly forbid the development of such sites.

Redevelopment of Cleared Sites

6.43 Although the impact of the Housing Market Renewal Fund will lead to an increase in the clearance of existing residential property, it is the express intention of the Pathfinder to actually *increase* the amount of housing within the Pathfinder area. The Master Plans for both Derker and Freehold/Werneth make it clear that sites cleared of residential properties will in the main be redeveloped for residential use. Given the fact that a substantial amount of housing to be cleared will be in flatted and terraced form, it is unlikely that the new housing will be developed to the same density. Experience from the past redevelopment of clearance sites suggests that an average of 60% of cleared housing could be replaced on site. The Pre-Inquiry Change therefore includes a clearance replacement figure of 160 dwellings p.a., based on 60% of the average potential HMR clearance of 267 dwellings p.a. (4,000 dwellings over 15 years).

6.44 As expressed above, the actual rate of clearance within HMR will vary according to a number of factors. Further, it is clear that the actual number of dwellings built back on a cleared site will vary and be dependent on both the nature/density of the cleared properties and the nature and design of the replacement housing. As such this is an issue which will be kept under careful review as part of the Draft RUDP housing supply. Should such monitoring indicate that replacement rates are likely to be lower than expected for an extended period of time, then the policies of the Housing Section of the plan provide the facility for the Council to review its position regarding the housing land supply/requirement and give notice through a supplementary planning

document that specified Phase 2 sites are considered to be available for development.

7. RESPONSE TO ISSUES RAISED BY OBJECTORS

- 7.1 The Council's response is set out in the order in which the issues were summarised above.

H1 Housing Land Requirement and Supply,

Issue 1 - The housing requirement is too low and additional housing land should be allocated.

- 7.2 The Council's approach to establishing the housing requirement fully accords with both RPG13 (Policy UR7) which establishes the annual average rate of housing provision for each strategic planning authority in the North West, and the advice set out in PPG3 – Housing, paragraph 7, which states that local planning authorities must have regard to the overall level of housing set by regional planning guidance, and warns against re-opening the consideration of the level of housing provision. As stated in paragraph 6.6, a review of RPG13 is currently being undertaken, but until that review is complete, the housing requirement set out in RPG13 policy UR7 provides the framework for the Draft Replacement UDP.

Issue 2 - The “brownfield” target is too high.

- 7.3 Policy H1 establishes a target for the development of previously developed land (including buildings) over the Plan period which is expressed as an “average of at least 80% of new dwellings”. This requirement is based on that set out in RPG13, Policy UR4 and is entirely consistent with the Government objective of maximising the

amount of new residential development on previously-developed land. It is therefore the Council's view that the target set out in policy H1 is reasonable and appropriate.

Issue 3 - The windfall and small sites allowances are too high.

- 7.4 The background to the setting of the small sites allowance and windfall allowance has been set out above. The Council accepts that the setting of such allowances requires a degree of estimation. However, as Table 5 in Appendix 1 shows, there is a constant flow of new sites of all sizes coming forward for development through the grant of planning permission. The Council's housing land monitoring process indicates that a high proportion of these sites come forward for development. For example, over the period April 2003 to March 2004, the rate of development of small sites under construction (89 dwellings - see Table 6 in Appendix 1) exceeded the Draft RUDP allowance (55 dwellings).

Issue 4 - The clearance strategy is unclear/simplistic and under estimates future clearance levels.

- 7.5 As explained above, the Council has made a number of Pre-Inquiry Changes to the clearance section of policy H1. The changes acknowledge that the clearance rate set out in both the First Deposit and Revised Deposit Draft RUDP will be exceeded and gives an indication of the possible scale of such clearance. The Pre-Inquiry Changes also make it clear that although the HMR Pathfinder aspires to a certain level of clearance, for the reasons set out above, it is by no means certain that 4,000 or so dwellings will actually be cleared. It is the Council's view that the policy as established by the Pre-Inquiry Changes is as clear as current circumstances allow and offers a

realistic view of future clearance levels in Oldham, recognising as it does that the monitoring of proposed clearance and the potential impact on housing land supply/requirement will form an important part of future annual housing land monitoring reports.

Issue 5 - Vacant dwellings should not be deducted from the clearance allowance.

7.6 The Revised Deposit Draft RUDP stated that cleared dwellings which have been vacant for more than 6 months would not be counted towards the RUDP clearance rate. This approach was adopted in response to concerns that a significant number of dwellings within the HMR areas, which may be subject to clearance, were vacant. As experience of HMR grows, however, it has become clear that although vacancy levels are indeed high in some parts of the Pathfinder, many properties which may be cleared remain occupied. The Council has proposed a pre-inquiry change deleting the reference to this issue. This helps to overcome difficulties around definitions of vacancy and represents a more cautious approach regarding planned growth within the HMR areas. Thus the Council now proposes that all cleared properties, whether vacant or not, will be counted for the purposes of calculating progress against the housing requirement as set out in Policy H1. It is, therefore, the Council's view that this issue has now been addressed.

Issue 6 – The reoccupation of vacant dwellings should not count towards the housing requirement.

7.7 The First Deposit Draft RUDP included an allowance of 63 dwellings p.a for the reoccupation of vacant dwellings, based on the Council's Empty Homes Strategy. The Council also took the view that this approach was in line with policy UR6 of RPG13, which encourages

local planning authorities to give high priority to making the best use of existing dwellings so as to minimise the need to develop new housing on greenfield sites. The justification to the policy further states, “ Attempts to reduce housing vacancy levels should re-use the existing stock wherever possible to minimise the amount of land needed for new housing to meet the requirements set out in Policy UR7.”

- 7.8 Subsequently, at Revised Deposit stage the Council withdrew the re-occupation allowance, owing to difficulties around the monitoring of this figure, but reserved the right to count re-occupied dwellings against the housing requirement set out in policy H1. A number of objectors have pointed out that this approach is inappropriate, since the housing requirement set out in RPG13 already allows for a reduction in vacancy rate. The Secretary of State reduced the final RPG13 requirement by 50 dwellings p.a. for Oldham (in line with similar reductions across the region) on the assumption that regional vacancy rates would fall to 3%. The Council finds the advice in Policy UR6 and paragraph 5.25 of RPG13 unclear on the issue of vacancy. However, it now, on balance, accepts the objectors’ point that the Regional Spatial Strategy figure has been reduced to allow for a predicted reduction in vacancy rates and that UR6 should not be taken as a justification to count the re-occupation of vacant dwellings towards the housing requirement, but rather to be a policy designed to achieve the assumed 3% vacancy rate. Therefore, the re-occupation of vacant dwellings should not count towards the housing requirement set out in Policy H1 because this could constitute “double counting”. This represents a cautious approach given some uncertainty around interpretation of this particular aspect of RPG13. It also helps to overcome difficulties around definitions and the monitoring of vacancy. The Council has, therefore, made a pre-inquiry change deleting references to the re-occupation of vacant dwellings. It is the Council's view that this issue has been addressed.

Issue 7 - SPD should not be used as part of the phasing mechanism.

7.9 The Council's approach to the use of a phasing policy has been explained in detail above. The reasoned justification to policy H1 also provides an extensive explanation of the Council's approach to this issue and for the sake of brevity it is not intended to repeat it in detail in this paper. In summary, however, it is the Council's view that the use of a phasing policy is entirely in-line with the objectives of PPG3 and in particular the "plan, monitor and manage" approach to the release of land for housing, as outlined above, and that the use of SPD accords with "Planning to Deliver", again as outlined above. It is therefore the Council's view that the approach to phasing and the use of SPD is clear, reasonable and in-line with a key aspect of Government planning policy.

H1.1 Housing Land Release, Phase 1, and H1.2 Housing Land Release, Phase 2

Issue 1 - Housing allocations are unlikely to provide a choice of good quality housing.

7.10 Through the publication of the First Deposit Draft RUDP, the Revised Deposit Draft RUDP and through the proposed pre-inquiry changes outlined above, the Council has made a total of 28 allocations for Phase 1 residential development, or mixed development including residential use. The objectives of the Housing Chapter include a reference to ensuring that a spread of housing sites is made available throughout the Borough. In response to a series of objections made to the First Deposit Draft RUDP, at Revised Deposit Stage the Council

amended objective (g) to include a reference to encouraging a variety of house types, including “upper market” housing.

7.11 The table in Appendix 3 provides an indication of the status of all sites allocated for Phase 1 housing or mixed use development through the review of the UDP. It is clear from this table that a significant number of sites have come forward for development, either through the grant of planning permission or having commenced construction. Further, Table 11 in Appendix 1 provides an indication of the types of housing currently being developed in the Borough. As can be seen, the complete range of house types is currently being developed. Further, the level of development activity in the Borough is being achieved through a number of large and medium sized developers who operate at national, regional and local levels.

7.12 Finally, through the Housing Market Renewal Fund, the Council is proactively encouraging high quality housing. For example, on the St. Mary's site (allocation H1.1.6) the Council is working with English Partnerships, Gleeson Homes, Contour Housing Association and Triangle Architects to develop cutting edge, highly sustainable housing on the edge of Oldham Town Centre. On the Vulcan Street site (allocation H1.1.22) the Council in conjunction with a local private developer has recently taken part in setting up a design competition with the aim of producing modern, high quality homes.

7.13 As the Vision Statement for the HMR Pathfinder states, “Nothing less than fundamental change will do”, (HMR Prospectus, page 2). The provision of modern quality housing is central to this vision.

7.14 It is therefore the Council's view that there is no evidence that housing allocations are unlikely to provide a choice of good quality housing and indeed that the housing allocations, plus commitments and future windfall sites will provide a choice of good quality housing.

Issue 2 - Too much housing development/negative impact on Saddleworth villages.

- 7.15 A number of objectors have raised concerns that there is too much housing development taking place in Saddleworth. As a result of objections relating to this issue the Council included a Table in Appendix C of the Revised Deposit Draft RUDP, which indicated the dwelling supply attributable to commitments and allocations in each of the seven sub-districts. This showed that 25.2% of this supply was in Saddleworth, the second highest in the Borough, with Oldham the highest at 43.0%.
- 7.16 The proposed pre-inquiry changes outlined above change the total housing land supply and to some extent its distribution. The Council has therefore revised the table in Appendix C of the Revised Deposit Draft RUDP through a proposed pre-inquiry change. As a result of the proposed pre-inquiry changes, the proportions in Oldham and Saddleworth change to 47.3% and 20.9% respectively.
- 7.17 Further, it is a stated objective of the Draft RUDP that the plan will allow for a spread of housing sites across the Borough. Owing to its pleasant environment, Saddleworth is attractive to both developers and would-be residents. It is not the intention of the Council to delete allocations in Saddleworth, particularly as all of the current Phase 1 allocations there involve the development of previously developed land, which would provide local regeneration benefits. However, it should be made clear that it is the intention to continue to actively promote development in the more urban areas of the Borough, particularly through the HMR Pathfinder and the Council's new Regeneration Department.

Issue 3 - General uncertainty about the availability of allocated sites.

7.18 As stated above under Issue 1, the table in Appendix 3 shows the current status of all sites allocated through the First Deposit Draft RUDP and since. Of 28 sites allocated for Phase 1 development, construction has started on 5 (which have a combined capacity of 193 dwellings) and site preparation works have begun on a further 2 sites (with a capacity of 123 dwellings). Only 5 of the Phase 1 allocations, excluding those amended by the Council's proposed pre-inquiry changes (which are new allocations or allocations brought forward from Phase 2), have not reached planning application stage, and of these, pre-application discussions are underway on one. It is the Council's view, therefore, that there is a high degree of certainty that allocated Phase 1 sites will come forward for development within the plan period.

8. CONCLUSION

- 8.1 In conclusion, the approach set out in the Revised Deposit Draft RUDP and the proposed pre-inquiry changes:
- a. Is consistent with national and regional guidance;
 - b. Is consistent with the urban regeneration agenda and, in particular, the HMR Pathfinder;
 - c. provides for an adequate supply of housing land to meet requirements; and
 - d. is appropriate in the circumstances, given the degree of uncertainty around clearance levels and the impacts of clearance on the housing requirement.

8.2 The approach ensures that a long term strategy for the sustainable regeneration of the Borough will not be jeopardised through short term decisions.

APPENDIX 1 TECHNICAL INFORMATION

SECTION A – TOTAL DRAFT RUDP HOUSING LAND SUPPLY

Table 1: Total Housing Land Supply, April 2004 to March 2011

	<i>Dwellings</i>	<i>% Dwellings PDL</i>	<i>% Dwellings GF</i>
1. Large sites under construction 2004	361	76.5	23.5
2. Large sites with planning permission 2004	361	81.7	18.3
3. Large sites awaiting signing of a legal agreement 2004	136	100	0
Sub-total (1 + 2 + 3)	858	82.4	17.6
4. Phase 1 allocations	1202	100	0
5. Phase 2 allocations	408	3	97
Sub-total (4 + 5)	1610	75	25
6. Small sites allowance at 55 dwellings p.a. 2004 –2011	385	100	0
7. Completions on large windfall sites @ 100 dwellings p.a. 2006-2011	500	100	0
8. Allowance for build-back on clearance sites @ 160 dwellings p.a. 2007-2011	640	100	0
Sub-total (6 + 7 + 8)	1525	100	0
OVERALL TOTAL	3993	86	14

SECTION B - NEW HOUSE BUILDING AND CLEARANCE

Table 2: Housing Completions and Clearance 1st July 1992 to 31st March 2004

Year	Gross Completions	Clearance	Net Change
1992/93	620	435	185
1993/94	655*	266	389
1994/95	453	166	287
1995/96	756	83	673
1996/97	736	135	601
1997/98 & 1998/99	1,163	533	630
1999-2000	426	102	324
2000-2001(a)	258	228	30
2001-2002 (b)	368	95	273
2002-2003	370	47	323
2003-2004 (c)	497	227	270

*Includes 77 unrecorded units cleared between 1990 and 1993.

(a) Covers period July 2000-March 2001.

(b) First year of new system of monitoring measuring April-March.

(c) Includes 36 completions which are accountable to the previous two years.

Table 3: Percentage of Completions on previously developed land.

Year	Total	PDL	% PDL
1996 – 1997			69.0
1997 – 1999			71.0
1999 – 2000	426	391	91.8
2000 – 2001 (a)	258	213	82.5
2001-2002 (b)	368	280	76.0
2002-2003	370	320	86.5
2003-2004	497	419	84.0

(a) Covers period July 2000-March 2001.

(b) First year of new system of monitoring measuring April-March.

Table 4 - Completions By Developer Type

Year	HA		Private		Total
	No.	%	No.	%	No.
1992/93	200	32	420	68	620
1993/94	190	29	465	71	655
1994/95	52	11	401	89	453
1995/96	81	11	675	89	756
1996/97	89	12	647	88	736
1997/98 & 1998/99	130	11	1,033	89	1,163
1999-2000	54	13	372	87	426
2000-2001	59	23	199	77	258
2001-2002	121	33	247	67	368
2002-2003	0	0	370	100	370
2003-2004	49	10	448	90	497

SECTION C - NEW OR “WINDFALL” SITES 1999-2004

Table 5 - New Sites by Size 1999-2004

Important Note – Table 4 indicates the number of new sites coming forward each year – i.e. previously unknown sites or “windfall” sites. For the avoidance of doubt, it should be noted that none of the large new sites will count towards the Draft RUDP windfall allowance as their contribution to the Draft RUDP supply would have been attributed to the commitments category of table X in policy H1.1 (as amended to a 2004 base date in the Council's Pre-Inquiry Changes).

Year	Small		Large		Total	
	Sites	Dwellings	Sites	Dwellings	Sites	Dwellings
1999	40	65	5	102	45	167
2000	62	109	7	508	69	617
2001	36	82	5	105	41	187
2002	35	77	2	62	37	139
2003	49	120	8	163	57	283

2004	65	136	14	264	79	400
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Small = less than 10 dwellings/0.4 hectare. Large = 10 dwellings/0.4 ha and above.

SECTION D – SMALL SITES ALLOWANCE

Table 6 - Small Sites Supply – Under construction and with an outstanding planning permission*, 1999-2004

Year	U/C		PP*		TOTAL	
	Sites	Dwellings	Sites	Dwellings	Sites	Dwellings
1999	29	70	N/a	N/a	-	-
2000	37	76	88	155	125	231
2001	40	76	92	188	132	264
2002	58	125	94	176	152	301
2003	53	138	114	215	167	353
2004	39	89	141	274	180	363

*Includes sites awaiting the signing of a legal agreement.

Table 7 - Completions on Small Sites 1997-2004

Year	Total Completed	Previously Developed Land		Greenfield Land	
		No.	%	No.	%
1997-1999	130	115	88.5	15	11.5
1999-2000	88	73	83	15	17
2000-2001	39	31	79.5	8	20.5
2001-2002	43	38	88	5	12
2002-2003	79	59	75	20	25
2003-2004	122	100	82	22	18
Average 2001-2004	81	66	80.7	16	19.3
RUDP Target	-	55	-	-	-

SECTION E - WINDFALL ALLOWANCE

Table 8 - Completions on Medium Windfall Sites 1997 - 2001

Year	Total Completed	Previously Developed Land		Greenfield Land	
		No.	%	No.	%
1997-1999	82	59	72	23	28
1999-2000	61	57	93.4	4	6.6
2000-2001	25	25	100	0	0
Total	168	141	84	27	16
Average	42	35		7	

Table 9 - Completions on Large Windfall Sites 1997 - 2001

Year	Total Completed	Previously Developed Land		Greenfield Land	
		No.	%	No.	%
1997-1999	230	212	92	18	8
1999-2000	49	49	100	0	0
2000-2001	45	45	100	0	0
Total	324	306	94.5	18	5.5
Average	81	76.5		4.5	

SECTION F - HOUSING SUPPLY 2004

Table 10 - Total Supply by Category 2004

Category	Sites	Dwellings
Sites under construction (dwellings remaining)	55	450
Sites with planning permission	152	627
Sites with an outstanding S106 agreement	17	456
Replacement UDP Sites	8	417
Other sites	23	145
Total Supply	255	2,095

* These figures do **not** include Revised Draft RUDP Phase 2 housing allocations.

Table 11 – Completions and Proposed Windfalls by Type of Property

Total Completions – by Type of Property, 2004 (Number of Properties)							
Beds	House Types					Total	% of beds
	Detached	Semi	Terraced	Flat			
1	0	0	0	12	12	2.5	
2	7	8	40	46	101	20.6	
3	59	60	79	2	200	40.9	
4+	109	26	41	0	176	36.0	
Total	175	94	160	60	489		
% of type	35.8	19.2	32.7	12.3			
New Windfall Sites 2004 – by Type of Property Planned (where known*) (Number of properties)							
1	0	0	4	10	14	4.7	
2	5	8	18	136	167	56.6	
3	7	21	30	1	59	20.0	
4+	45	5	5	0	55	18.6	
Total	57	34	57	147	295		

% of Type	19.3	11.5	19.3	49.8		
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* Windfall details are of 295 properties known out of the 400 dwellings planned.

Table 12 – Supply by Sub-District, 2004

Sub-District	Sites	Dwellings
Chadderton	19	234
Crompton	21	119
Failsworth	11	85
Lees	13	128
Oldham	81	684
Royton	24	228
Saddleworth	86	617
Total	255	2,095

Table 13 – Dwelling Completions 2004 – Total and Previously Developed Land by Sub-District

Sub-District	Overall Total	PDL	% Total PDL	% of Total Completions
Chadderton	15	15	3.6	3.0
Crompton	8	6	1.4	1.6
Failsworth	29	8	1.9	5.8
Lees	20	19	4.6	4.0
Oldham	299	290	69.2	60.2
Royton	22	18	4.3	4.4
Saddleworth	104	63	15.0	20.9
Total	497	419	84.3	

APPENDIX 2 DOCUMENTS REFERRED TO IN THE TOPIC PAPER

1. Planning Policy Guidance Note 3, Housing, ODPM, March 2000.
2. Regional Planning Guidance for the North West (RPG13) March 2003, Government Office for the North West – now known as Regional Spatial Strategy for the North West following commencement of parts of the Planning and Compulsory Purchase Act on 28th September 2004.
3. Review of Greater Manchester Strategic Planning Framework, August 1999, Association of Greater Manchester Authorities.
4. A Strategy for Greater Manchester, 2003, Association of Greater Manchester Authorities.
5. Transformation and Cohesion, the HMR Prospectus for the Oldham and Rochdale Pathfinder, December 2003.
6. Oldham Beyond – A Vision for the Borough of Oldham, April 2004, URBED.

APPENDIX 3 STATUS OF DRAFT RUDP PHASE 1 HOUSING ALLOCATIONS

Since the publication of the First Deposit Draft RUDP, there have been changes to the allocation of sites in Phases 1 and 2 (Policies H1.1 and H1.2 respectively). These changes have been the result of:

- Updating the allocation list to a 31st March 2003 base for the Revised Deposit Draft RUDP. This involved deleting sites which had been allocated at First Deposit stage and subsequently had received planning permission.
- Bringing Phase 2 sites forward into Phase 1 for the Revised Deposit Draft RUDP.
- Updating the allocation list to a 31st March 2004 base as a proposed pre-inquiry change. This involved deleting sites which had been allocated at Revised Deposit stage and subsequently had received planning permission.
- Bringing Phase 2 sites forward into Phase 1 as a proposed pre-inquiry change.
- Adding new allocations to Phase 1 as a proposed pre-inquiry change.

The intention of this table is to aid the Inquiry by summarising the current status of all sites allocated for phase 1 housing through the UDP review process. It includes sites amended and added as a Pre-Inquiry Change.

Phase 1						
Ref	Site	Type	Size (ha)	Indicative Capacity	Indicative Density	Current Status
H1.1.1	Land at Hunt Lane, Chadderton	PDL	4.05	120	30	Deleted at Revised Deposit stage owing to refusal of a planning application at the direction of the Highways Agency. Planning permission now granted for 125 dwellings on appeal.
H1.1.2	Land off Fields New Rd/Ramsey Street, Chadderton	PDL	3.41	136	40	Current RUDP Phase 1 allocation. Planning approval for 136 dwellings is subject to the signing of a legal agreement.
M3	Land at Oldham	PDL	1.56	10	-	Current RUDP Phase 1 allocation.

	Rd/ Hardman Street, Failsworth*					
H1.1.4	High Barn Rd, Royton	GF	3.1	56	18	Deleted at Revised Deposit stage owing to the grant of planning permission for 56 dwellings. Site preparation currently in progress.
H1.1.5	Cape Mill, Refuge St, Crompton	PDL	1.55	62	40	Deleted at Revised Deposit stage owing to the grant of planning permission for 67 dwellings. Site preparation currently in progress.
H1.1.6	St. Mary's Way Oldham	PDL	2.56	180	72	Current RUDP Phase 1 allocation. Members minded to approve application for 112 dwellings on 23/4/03. However, English Partnerships are currently engaged with the Council and its development partner in a complete redrafting of the scheme. It is envisaged that approximately 180 dwellings will now be developed, as amended by a pre-inquiry change. Development scheduled to begin mid-2005.
H1.1.7	Block Lane, Oldham	GF	2.29	92	40	Deleted at Revised Deposit stage owing to the grant of planning permission for 81 dwellings. Site now under construction.
H1.1.8	Land at Redgrave Street, Oldham	PDL	0.86	26	30	Deleted at revised deposit stage owing to the granting of an approval for a supermarket on appeal.
H1.1.9	Lower Lime Road, Oldham	PDL	2.59	78	30	Current RUDP Phase 1 allocation.
H1.1.10	Athens Way, Lees	PDL	0.55	22	40	Current RUDP Phase 1 allocation.
H1.1.11	Acorn Mill, St. John Street, Lees	PDL	0.23	35		Deleted at Pre-Inquiry Change stage owing to the grant of planning permission for 44 dwellings. Site now under construction.
H1.1.12	High Street/ Hartshead St, Lees	PDL	0.52	26	50	Deleted at Revised Deposit stage owing to the grant of planning permission for 34 dwellings. Site now under construction.
H1.1.13	Coverhill Rd, Grotton, Saddleworth	GF	0.58	11	19	Deleted at Pre-Inquiry Change stage owing to the grant of outline planning permission for 10 dwellings.
M2	Lumb Mill, Huddersfield Road, Delph, Saddleworth*	PDL	1.4	20	-	Current RUDP Phase 1 allocation. Planning application for 62 dwellings called in by the Secretary of State. The call-in Inquiry is programmed to begin on 21 st June 2005.
H1.1.15	Bailey Mill, Oldham Rd/Delph New Road, Delph, Saddleworth	PDL	0.86	50	43	Current RUDP Phase 1 allocation.
H1.1.16	Buckley New Mill, High Street, Uppermill, Saddleworth*	PDL	0.22	13	-	Deleted at Revised Deposit stage owing to the grant of planning permission for 14 dwellings. Site now under construction.

H1.1.17	Hopkinson Close, Uppermill, Saddleworth	PDL	0.37	20	50	Deleted at Revised Deposit stage owing to the grant of planning permission for 20 dwellings. Site now under construction.
M1	Frenches Wharf/Wellington Road, Greenfield Saddleworth*	PDL	4.76	70	-	Current RUDP Phase 1 allocation. Planning application for a mixed use development, including an indicative 99 dwellings, called in by the Secretary of State. The call-in Inquiry is programmed to begin on 21 st June 2005.
H1.1.19	Andrew Mill, Manchester Road/Chew Valley Road, Greenfield, Saddleworth	PDL	1.34	30	30	Current RUDP Phase 1 allocation. Planning application for 24 dwellings, called in by the Secretary of State. No date has been set for the start of the Inquiry.
H1.1.20	Rose Mill, Coalshaw Green Road, Chadderton	PDL	1.49	45	30	Moved from Phase 2 to Phase 1 at Revised Deposit stage. Private developer currently negotiating with the land owner.
H1.1.21	Springhey Mill, Huddersfield Road, Oldham	PDL	0.39	15	40	Moved from Phase 2 to Phase 1 at Revised Deposit stage.
H1.1.22	Vulcan Street, Oldham	PDL	1.23	61	50	New Draft RUDP Phase 1 allocation at revised deposit stage. Design competition recently completed.
H1.1.23	Pretoria Road, Oldham	PDL	0.46	14	30	Moved from Phase 2 to Phase 1 as a Pre-Inquiry Change.
H1.1.24	Sandy Mill, Royton	PDL	2.12	85	40	Moved from Phase 2 to Phase 1 as a Pre-Inquiry Change, and original site area extended. At the time of writing the Council is considering a planning application based on the original site boundary.
H1.1.25	Jowett Street, Oldham	PDL	0.66	26	40	Moved from Phase 2 to Phase 1 as a Pre-Inquiry Change.
M4	Huddersfield Road/Dunkerley Street, Oldham*	PDL	2.61	50	-	Moved from Phase 2 to Phase 1 as a Pre-Inquiry Change.
H1.1.26	Spencer Street, Oldham	PDL	3.00	150	50	New Phase 1 allocation proposed as a Pre-Inquiry Change.
H1.1.27	Hartford Mill/Land off Milne Street, Oldham	PDL	2.84	160	56	New Phase 1 allocation proposed as a Pre-Inquiry Change. The development potential of the Hartford Mill element of the site is currently being appraised by GVA Grimley through the HMR initiative.
TOTAL					1663	

Note:

- a. PDL = Previously Developed Land. GF = Greenfield land.
- b. Sites marked * are mixed use allocations which have a housing element
- c. Further details of the Council's requirements for each site can be found in Appendix 2 B.
- d. Housing capacities and densities referred to above are indicative only. Final developments on these sites may be at lower or higher capacities and densities.

APPENDIX 4 SUMMARY OF PROPOSED PRE-INQUIRY CHANGES TO HOUSING POLICIES, NOVEMBER 2004*.

Policy	Summary of Changes	Reason
H1 Housing land requirement and supply	<p>No changes to the policy wording, but significant changes to the reasoned justification to:</p> <ul style="list-style-type: none"> • Delete paragraph 6.10 and its reference to obsolete dwellings; • Re-draft paragraph 11, changing the approach in the plan to clearance; • Delete paragraphs 6.12 and 6.13 and reference to non-replacement of vacant dwellings; • Add vacancy rates to the list of monitoring information in paragraph 6.20. 	To meet objections, bring the plan up to date as far as possible regarding Housing Market Renewal, and reflect RPG13.
H1.1 Housing Land Release Phase 1	<p>Changes to the Phase 1 housing allocations to:</p> <ul style="list-style-type: none"> • Bring forward the site at Pretoria Road from Phase 2; • Bring forward the site at Sandy Mill from Phase 2 and extend the allocation; • Bring forward the site at Jowett Street from Phase 2; • Bring forward the site at Huddersfield Road/Dunkerley Street from Phase 2; • Allocate a new Phase 1 site at Spencer Street, Oldham; and • Allocate a new Phase 1 site at Hartford Mill, Oldham. <p>Changes to the reasoned justification to:</p>	To reflect the changed approach to clearance under H1 and bring the plan up to date regarding Housing Market Renewal.

	<ul style="list-style-type: none"> • Amend Table 3 to reflect the housing land supply as at April 2004; • Refer to an on-site build back assumption of 60% on cleared sites in paragraph 6.26; and • Amend Table 4 to reflect changed windfall assumption. 	
H1.2 Housing Land Release Phase 2.	Changes to the Phase 2 housing allocations to move four sites (see above) from Phase 2 to Phase 1.	To reflect changes resulting from the new approach to clearance.

* N.B. the changes are at the time of writing still subject to full Council approval on 24th November 2004.