

## APPENDIX F

### OLDHAM REPLACEMENT UNITARY DEVELOPMENT PLAN

#### NOTES OF ROUND TABLE SESSION ON HOUSING HELD ON 9 FEBRUARY 2005

##### ATTENDING:

Richard Mordey	Inspector - PINS
George Arrowsmith	Inspector - PINS
Sarah Barker	Oldham MBC
John Billington	OMBC
Mike Gibson	OMBC
Mark Glyn	OMBC
Len Harris	OMBC
Phil Jobling	OMBC
Gareth Owen	OMBC
Tony McAteer	MCP Planning & Development - representing various objectors
Richard Purser	MCP
Sarah Baron	Broadway Malyan - representing Westbury Homes
Jane Dickman	Westbury Homes
Peter Emery	Emery Planning - representing Holroy Developments
Alan Chorlton	Chorlton Planning - representing various objectors
Justin Paul	J10 Planning - representing Whiteoak Ltd

## **FORMAT OF NOTES**

These are summary notes of the discussion and not a verbatim report. The session followed the agenda set out by the Inspectors.

## **TIMESCALE**

Several objectors argued that the RUDP:

- does not satisfy PPG3's requirement for a sufficient supply of sites to be shown on the proposals map to accommodate at least the first 5 years of the plan
- does not make provision for at least 10 years potential supply of housing in accordance with the Minister, Keith Hill's, statement that plans should make provision for at least 10 years potential supply of housing

The Council were satisfied that the plan did identify a 5 year supply. They accepted that their choice of 2011 as an end date for the housing proposals did not satisfy the 10 year requirement but argued that this was justified by exceptional circumstances, these being:

- the Government's choice of Oldham and Rochdale as one of the Pathfinder areas under the Housing Market Renewal Fund (HMR)
- the review of housing targets as part of the partial review of RPG13 (now RSS13)
- the advent of the new planning system.

The Council were also concerned that identifying provision to 2016 could lead to over-allocation.

There was discussion about the extent to which these circumstances justified the Council's approach. Objectors said that the designation of HMRS in other locations had not prevented plans identifying a 10 year housing supply. The Council maintained that circumstances in Oldham were different and that, in any event, housing resulting from windfalls would avoid any potential problems. They pointed out that the Government Office for the North West had not objected to their approach.

All parties maintained their positions.

## **OVERALL REQUIREMENT.**

There was no dispute over the 270 dwellings per annum requirement in RSS13. One objector considered that the plan said little about managing and monitoring supply. The Council maintained that the plan was clear on this.

An objector suggested replacing the word "accommodate" in policy H1 by "achieve". The Council had no objection to the replacement.

## ***Clearance***

In the light of the HMR the Council had changed its position on clearance from that in the Revised Deposit Draft. It is now assuming an annual clearance rate of 267 dwellings per annum based on clearance rates in the HMR Prospectus. There were some minor differences between the participants on the exact allowance to be made for clearance depending on such factors as the overlap between the HMR and RUDP timeframes and the need to provide new dwellings in advance of clearance. Alternative allowances proposed ranged from 256 dwellings per annum (MCP) to 300 (Emery).

There was considerable discussion about the way the HMR would operate, with reference to matters like the replacement strategy and building costs. The Council emphasised the need to be responsive to change as the HMR programme develops.

## **HOUSING SUPPLY**

### ***Commitments***

Objectors made the point that resolutions to grant planning permission subject to a section 106 agreement are not actually commitments. The Council responded that they were effectively commitments since the principle of development had been accepted. They cannot properly be classed as allocations, and the sites are usually developed.

In response to an objector the Council said that allocation site no H1.1.2 (Housing Topic Paper, Appendix 3) has not been included in the commitments allowance. They maintained that there was no duplication in the tables in the Housing Topic Paper, although there have been some changes since they were prepared.

An objector thought that there was double counting between completions and the windfall allowance. This would have the effect of reducing the supply from that estimated by the Council. The discussion is reported below.

### ***Slippage***

Some objectors argued that the Council should have made a 10% allowance for slippage. This was considered especially important in the light of the Council's failure to look beyond 2011 in their housing proposals. Reference was made to the support given by previous inspectors to such allowances and to PPS1's injunction to planning authorities to be realistic about what can be implemented over the plan period. As examples of currently zoned sites where slippage had already occurred, allocations H1.1.9 (Lower Lime Road, Oldham) and H1.1.10 (Athens Way, Lees) were quoted.

The Council were against the concept of a slippage allowance in principle. They considered that it conflicted with the 'Plan, Monitor and Manage' approach. In support of their stance they pointed out that the plan incorporated proposals for monitoring and

management and that the actual supply of housing in the previous plan period had exceeded the plan's calculated requirement.

### ***Allowance for Replacement on Cleared Sites***

The Council have assumed a 60% replacement rate on cleared sites within the HMR. Since an average annual clearance rate of 267 dwellings has been assumed, this equates to an annual replacement rate of 160 dwellings or an annual net clearance rate of 107 dwellings. One objector (Baron) accepted the 60% assumption. Another (Paul) referred to the lack of a needs or assessment survey.

The Council have treated replacement housing, or 'build-back', on cleared sites as part of the housing supply. One objector preferred the alternative approach of 'netting off' the build-back element to leave a residual housing requirement - i.e. the difference between the number of houses cleared and the number built back on site. It was agreed that the difference in approach should not lead to any difference in the calculated need for new housing sites.

Some objectors considered that the 60% assumed replacement rate was too high. Alternative replacement assumptions ranged from 40% to 55%. Their reasons included:

- Past experience in Oldham and other locations
- Assessment of the HMR objectives, which include the need to provide larger family houses and better living conditions
- An assessment of the masterplan for Derker contained in the HMR Prospectus
- PPS1's encouragement of mixed development
- RSS13's reference to physical and social problems in areas of high density older housing.

The different assumptions on replacement rates are combined with differences in assumptions about timing. For example, the objector who advocated a 40% replacement assumption also argued that a large proportion of the replacement would take place after 2016. Consequently, alternative assumptions about the number of replacement dwellings built per annum on clearance sites range from 80 (Emery) to 141 (MCP) compared with the Council's estimate of 160.

The Council said that assessing the replacement rate was not an exact science. They said that replacement rates in Oldham had varied from 30% to 80%. Reference was made to an instance of 100% replacement in Burnley and to the Government's support for high residential densities. The representative from the HMR Pathfinder Team said that they were looking for high densities and high replacement rates. There was the opportunity to achieve 100% replacement in some areas. It was pointed out that table 8.7, Key Outputs, in the HMR Prospectus, envisaged a net increase in dwellings in the HMR area over the 15 year programme period. This is based on a big anticipated increase in years 6-15 as opposed to a decrease in years 1-5.

## *Windfall Sites*

There was no serious dispute over the small sites allowance.

Discussion centred on the Council's assumption that large windfall sites (at least 0.4ha or 10 dwellings) would generate 100 dwellings per annum from 2006 onwards.

There was no significant challenge to the Council's previous assumption (in the First and Revised Deposit Drafts of the RUDP) that large windfall sites would contribute an average of 75 dwellings per annum from 2006 onwards. However, there were serious reservations about the 100 dwellings per annum now assumed.

The Council produced an Interim Report on their Urban Potential Study 2005 together with a supporting Economic and Market Viability Assessment prepared by GVA Grimley.

In general terms the objectors' view was that the study and assessment were not sufficiently rigorous or comprehensive to provide a sound justification for the Council's 100 dwellings per annum assumption. In view of the limited time they had been given to analyse these documents the Inspector gave objectors the opportunity to comment in writing. Nevertheless from their preliminary reading objectors had a number of reservations including:

- The historical data supporting the windfall assessment does not go back beyond 1997.
- Some of the sites identified in the Urban Potential Study will not come forward early enough to contribute to a 10 year supply. Some of the sites identified as likely to come forward in the 5-10 year period would not produce completions in that period.
- Some sites may be more suitable for open space
- many of the sites considered have existing industrial or other uses.
- There has been no testing of the data with the house building industry or with site owners
- The sample of sites investigated by Grimley have a lot of problems, including the viability of residential redevelopment

The Council said that in carrying out the Urban Potential Study they had attempted to follow the North West Regional Assembly guidelines although they had not been able to follow them completely. The reason the supporting data went back only to 1997 is that it is the earliest date for which a greenfield/brownfield split is available. Future housing clearance sites have been excluded from the identification of potential sites as had, in most cases, land used as recreational open space.. However, the Council has not investigated the effect on employment of redeveloping existing industrial sites for housing. In future the Council would consult with the house building industry. They considered that the impact of the HMR might bring forward some of the sites that

Grimleys had classified as marginal into the 5-10 year period, which would bring them into the RUDP timescale to 2016.

Grimleys had been asked to assess a sample of 25 sites. In general these were more difficult sites on the west side of the Borough, especially those which would impact on the HMR. In assessing sites both the Council and Grimleys had taken into account sustainability.

The Council's decision to increase the annual windfall allowance by 25 dwellings (from 75 to 100) was just an estimate to reflect the impact of the HMR and related changes to policies B2.1 and B2.2.

Whilst recognising the validity of some of the objectors' reservations, the Council considered that the Urban Potential Study and the Economic and Market Viability Assessment showed that the estimate of 100 dwellings per annum for the period 2006-2011 is robust and realistic. Moreover they considered that there is potential to achieve a similar windfall rate in the medium (5-10 years) and long term (10-15 years).

In general objectors maintained their position that the Council had not substantiated their assumption of an annual supply of 100 dwellings from large windfalls over the period 2006-2011. Similar doubts applied to the medium and longer term supplies, from 5-10 and 10-15 years - i.e. from 2011-2021.

### ***Double Counting involving Commitments and Windfalls***

An objector (Emery) argued that, in many cases, large windfall sites would not begin to produce houses until more than 2 years after permission was granted. Therefore, whatever other reservations were applicable, it was over-optimistic for the Council to assume that sites which had not been granted planning permission by the base date of 31.3.04 could produce 100 completions a year from 2006 onwards. The objector referred to this as "double counting". The Council maintained that the committed supply of housing is quite distinct from the windfall supply and that there is no double counting.

### ***UDP Allocations***

An objector pointed out that an allocation does not necessarily guarantee that a site will be developed at any time or in the phase to which it is allocated. In response to concerns about the absence of a date for bringing forward Phase 2 allocations, the Council argued that it was necessary to ensure maximum flexibility.

## **OVERALL ADEQUACY OF SUPPLY**

Participants' views followed from their views on the components of supply and demand. Broadly speaking all the objectors considered that the plan has not identified sufficient sites to cover the plan period to 2016. Most considered that the combination of commitments, windfalls and Phase 1 allocations is not sufficient to provide a 5 year

supply from the likely date of adoption in 2006. Solutions advocated included the allocation of more sites, bringing forward some Phase 2 sites to Phase 1, allocating more land under the LR1 (Reserved for Future Development) designation and specifying the criteria for bringing forward more land for development in the plan rather than in Supplementary Planning Guidance (SPG).

The Council maintained their position that the circumstances surrounding the plan - the designation of the HMR, the impending revision of the RSS housing requirement and the advent of the new planning system - justified their approach. They argued that additional allocations could lead to overprovision and would conflict with the Plan, Monitor and Manage approach. They considered that the criteria specified in the plan used in conjunction with SPGs and the updating of the plan through the new Local Development Framework will prove an adequate mechanism for ensuring that the Borough has a sufficient supply of housing.

### **GEOGRAPHICAL DISTRIBUTION OF SUPPLY**

An objector (Chorlton) considered that there would eventually be a shortage of housing sites in Saddleworth when all the windfall sites had been used. He considered that too much land in Saddleworth had been designated as Local Green Gap, that the plan now put too much emphasis on the HMR (at the expense of areas like Shaw and Royton as well as Saddleworth) and that the First Deposit Draft had shown a better balance. Whilst supporting the proportion of housing supply allocated to Saddleworth, a second objector (MCP) considered that development there would be unlikely to impact on the HMR.

The Council maintained that the release of further housing sites in Saddleworth and elsewhere would conflict with the objectives of the HMR. They considered that the proportion of dwelling supply in Saddleworth (commitments plus allocations) is consistent with recent experience. The intention is to provide a spread of housing sites across the Borough while actively promoting development in the more urban areas, especially the HMR Pathfinder.

### **AFFORDABLE HOUSING**

An objector (Baron) considered that the presumed 25% quota for affordable housing in policy H2.1 was too inflexible. The Council replied that the figure was intended to act as a benchmark in negotiation with developers. It could be flexible in operation. Reference was made to the need for affordable housing in Saddleworth.

### **LIFETIME HOMES**

An objector (Baron) argued that the policy should be justified or deleted. The Council replied that it was an innovative and aspirational policy and that the 10% criterion could be used as a basis for negotiation.