

Oldham

Local

Plan

Strategic Housing Land Availability Assessment as at 1st April 2019

2020



Oldham
Council

1	Important information about the Strategic Housing Land Availability Assessment	2
2	Executive Summary	3
3	Introduction	6
4	Methodology	8
5	Findings	27
6	Housing Trajectories	36
7	Conclusion	42

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 will be identified through the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF), Oldham Local Plan (once adopted), any Neighbourhood Plans in the district or any sites that are included on Part 2 of the Brownfield Land Register (sites with Permission in Principle).*
- *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 ⁽¹⁾. 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.*
- *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.*

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

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 (economic viability) 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 its housing land requirement. Maps of potential sites and a brief summary assessment are found in the appendices.
- 2.3** The SHLAA forms a key component of the evidence base underpinning housing policies and land allocations in the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF) and Oldham's Local Plan (and informs the council's Brownfield Land Register). This will help the Local Plan to meet the area's housing needs and demonstrate whether we can provide a continuous five years' supply of housing land. It also identifies potential development land for up to fifteen years after the Plan is adopted.
- 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 GMSF, 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. The land included in the SHLAA forms the "baseline" housing land supply and does not include those strategic allocations which are being considered as part of GMSF.
- 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. [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 availability 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 as at 01/04/19);
- Sites with extant (current) full or outline residential planning permission as at 01/04/19;
- 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 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. On the whole, these sites are considered unconstrained in relation to significant policy or physical limitations).

2.9 Table 1 below sets out the number of dwellings in each of these categories and places them in five year time periods, up to 2029 and beyond. The column headed "Total Dwellings 2019-2024" represents the five year housing land supply. “Potential” sites included in this are those which have yet to receive permission as of 01/04/19 but where we are confident 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.

Table 1 Strategic Housing Land Supply 2019

SHLAA Category	Total Additions 2019-2024	Total Additions 2024-2029	Total Additions 11+	Total Additions All Periods
Sites under construction	1,203	0	0	1,203
Sites with extant planning permission	745	461	200	1,406
Saved UDP Phase 1 housing allocations	0	374	0	374
Saved UDP Phase 2 housing allocations	63	351	22	436
Lapsed and stalled sites >5 dwellings	0	591	402	993
Potential sites	370	2,439	2,406	5,215
<i>Subtotal</i>	<i>2,381</i>	<i>4,216</i>	<i>3,030</i>	<i>9,627</i>
Current small sites allowance minus any small sites already identified in supply	0	270	540	810
Current clearance allowance	-20	-20	-40	-80
Total	2,361	4,466	3,530	10,357

2.10 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.

2.11 Based on the above methodology, Local Housing Need (LHN) for Oldham has recently changed to 692 homes per year. This is due to the publication of the latest housing affordability ratios by the Office for National Statistics (ONS) in March 2019 and the subsequent adjustment this has made to Local Housing Need. Projected clearance is considered within the SHLAA and will need to be met on top of the local housing need.

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 67 of the National Planning Policy Framework (NPPF) 2019. 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 the likely economic viability (achievability).
- 3.2** The council will also be undertaking an Employment Land Review which will help to better understand the area's land supply. When completed, the employment land 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.
- 3.3** The SHLAA forms a key component of the evidence base which will underpin housing policies and land allocations in the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF) and the Oldham Local Plan. Paragraphs 73-75 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.
- 3.4** It is also used to inform the council's [Brownfield Land Register](#) which is published separately. The regulations ⁽¹⁾ 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.
- 3.5** Whilst the SHLAA is an important evidence source it does not, in itself, determine whether a site should be allocated for development. Instead, the purpose of the assessment is to provide information on a range of options to allow an informed decision to be made on which sites are most suitable to meet needs.

Greater Manchester Plan for Homes, Jobs and the Environment (GMSF)

- 3.6** Oldham Council is working with the Greater Manchester Combined Authority (GMCA) and the nine other GM authorities to develop the GMSF. The plan sets out how we'll make Greater Manchester one of the best places to live and work in the world. It's being produced by all 10 Councils working together in partnership, which will ensure that we have the right land available in the right places to deliver the homes and jobs we need up to 2038. It will also identify the new infrastructure such as transport, schools, health centres and utility networks required to achieve this.

1 Town and Country Planning (Brownfield Land Register) Regulations 2017.

- 3.7** The GMSF will identify what is needed to meet demand for housing and business development and will help manage the supply of land across the city-region. This will include determining how many new homes and how much land is needed for new jobs over the next 20 years, as well as identifying broad locations for development.
- 3.8** Public consultation on the draft GMSF was carried out from January to March 2019. The consultation responses are available through the GMCA website. The next consultation on the plan will be carried out in Summer 2020.
- 3.9** The SHLAA methodology outlined in this report follows the relevant Planning Practice Guidance (PPG) note updated in July 2019 by the Ministry of Housing Communities 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. The GMSF consultation in 2016 included a GM-wide call for sites where local residents, businesses, land owners and developers were invited to submit details of sites that they thought could be suitable for housing or economic development. Alongside the sites identified through other sources (see Table 2), the results of this call for sites process will contribute to the range of the 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

- 3.10** 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 (apart from those parts of the Borough that fall under the responsibility of the Peak District National Park Planning Authority).
- 3.11** As stated, the council is working collaboratively with the GMCA and the other nine GM districts to ensure that, whilst each authority will undertake their own SHLAA, the broad approach is consistent and will be used to inform the GMSF.
- 3.12** This report updates the 2018 SHLAA, published in December 2018. The baseline for this assessment is 1st April 2019. It provides the five year land supply position covering the period between 1st April 2019 and 31st March 2024, and also identifies the potential supply for the medium (years 6 to 10) and longer term (11 years plus).

4 Methodology

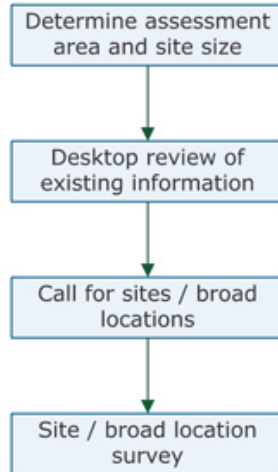
4.1 The purpose of this section is to outline the procedure used for completing the various stages of the SHLAA, informed by the methodology set out in the current PPG (updated July 2019). The guidance recommends the use of this standard process as it makes clear what inputs and processes are required in order 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.

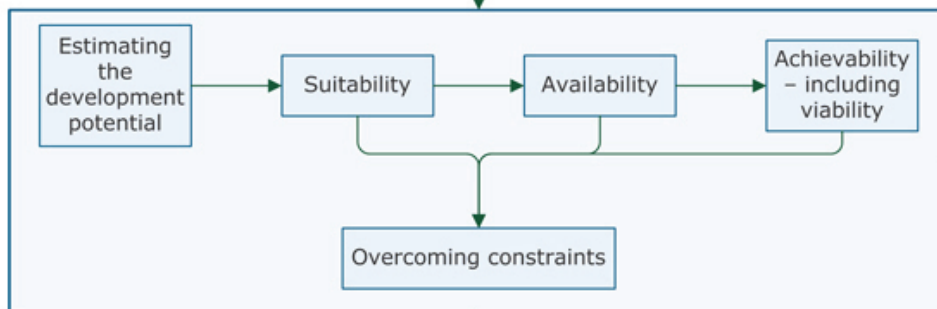
4.2 The flow chart overleaf sets out the various stages in the methodology:

Figure 1: SHLAA Methodology

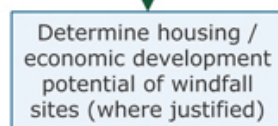
Stage 1- Site / broad location identification



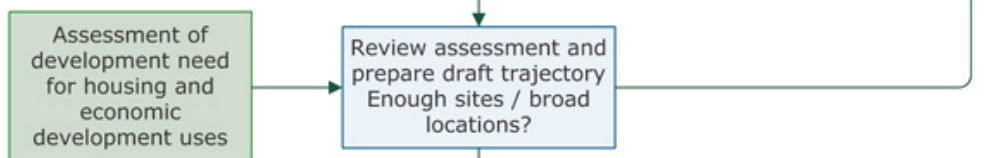
Stage 2 - Site / broad location assessment



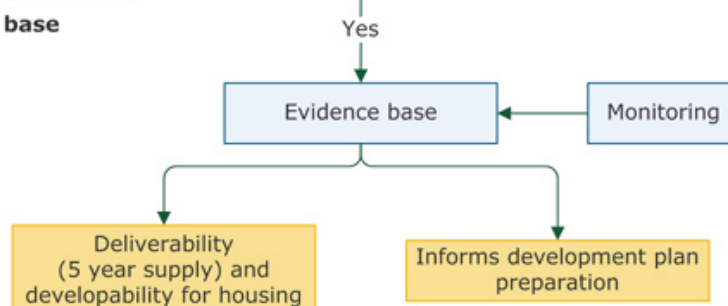
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



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 500m² of floor space) and above. However, the guidance allows for Local Planning Authorities to consider alternative thresholds if they feel this is 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 (Acolaid)/ 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 (Acolaid) / 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 (Acolaid) 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, land owners 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.
	Previous local call for sites exercises and ongoing call for sites exercise (from SHLAA 2018)	The Council undertook a 'call for sites' survey in 2012, to inform the then proposed Site Allocations Development Plan Document ⁽¹⁾ . There is also an ongoing call for sites exercise which was published as part of the previous SHLAA in 2018. Any

1 The preparation of the Site Allocations document has now been superseded by the GMSF consultation and the Local Plan Review.

Type Of Site	Potential Data Source	Explanation
		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 as part of any further Local Plan consultation	The council issued a Regulation 18 notice ⁽²⁾ , in 2017 marking the beginning of the new Local Plan review. A number of sites were submitted for consideration as part of the early consultation on this ⁽³⁾ .
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.
	Masterplans / Development briefs	Sites identified for potential residential uses in documents such as Oldham Town Centre and Royton Town Centre Masterplans.
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.

² 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.

³ 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. 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
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.
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.
	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. offices to residential)	Sources include: Local authority empty property register National Land Use Database-Previously Developed Land Commercial property databases Open Space Study	Vacant land and buildings have been assessed for their housing development potential.

Type Of Site	Potential Data Source	Explanation
	Employment Land Review Mill Survey	
Other greenfield land around edge of the urban area	Site surveys / Ordnance Survey maps / Aerial photography	The edges of existing urban areas and potential infill opportunities were assessed to identify any potential for urban expansion; this was done as a desk top exercise scrutinising OS and aerial maps, site visits, local knowledge and through suggestions at workshops / consultations.
Large scale redevelopment and redesign of existing residential or economic areas	Regeneration priority areas / proposals	Additional capacity or newly available land may emerge as part of wider clearance / redevelopment proposals.

Stage 2: Site / Broad Location Assessment

Desktop review of existing information

- 4.6** 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.
- 4.7** All sites included within the SHLAA have been plotted onto the council's Geographical Information System (GIS). A dedicated SHLAA database of known sites and locations also 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).
- 4.8** 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, United Utilities and Highways Agency) and other sections within the council as appropriate. GM Mapping tools and data, which provides information on key constraints and infrastructure, has also been used to inform the assessments.
- 4.9** PPG states that those sites where particular policy constraints have been identified through the desk-top 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 re-use them.

- 4.10** 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 are considered to be 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

- 4.11** 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

- 4.12** 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.

- 4.13** 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.

4.14 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 will be influenced by the outcomes of the GMSF. Policies and approaches emerging from this, alongside changes to national policy guidance and legislation, are very likely to have to be taken into account.

4.15 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.

4.16 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 the draft GMSF (or 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 to be subject to a more detailed open space audit and review before being considered for housing, assessing it against current and future needs of local residents. This is unless current circumstances suggest they could be suitable;
- 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 they still meet the criteria for future protection. An initial assessment of these sites has suggested that some areas may have housing potential. However, in order 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 form part of a GMSF allocation has been assessed separately.

4.17 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.

4.18 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.

Assessing the availability of sites / broad locations for development

4.19 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.

4.20 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 the GMSF consultation).

4.21 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 they 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

4.22 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.

4.23 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 had previous industrial uses or landfill).

Estimating the development potential of each site

- 4.24** When assessing the capacity of a site, it is acknowledged that not all of a site will 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.
- 4.25** For the SHLAA the following assumptions on net developable area were used (in line with the approach taken from the GMSF 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.
- 4.26** As there are no large sites assessed in this SHLAA, the 80% assumption has been used for all sites which do not already have an identified capacity.
- 4.27** 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 timeframe.
- 4.28** For other sites where there is no suggested capacity, the SHLAA has adapted the density assumptions used for different locations in the draft 2019 GMSF (adjusted for any individual site characteristics or physical constraints). Increasing residential densities is an essential element of the GMSF town centre strategy and new development should take advantage of high public transport connectivity in these areas. This is set out in Table 3 overleaf.
- 4.29** The draft GMSF, published in January 2019, set out proposed density assumptions for new housing developments. These have been used to inform the density assumptions and as such the capacity of sites within the SHLAA where appropriate. The assumptions are set out in the table overleaf:

Table 3 Draft GMSF 2019 Density Assumptions for New Housing

Location (highest density applies when site falls within more than one location)	Minimum net residential density (dwellings per hectare)		
	Within the location	Within 400 metres	Within 800 metres
Designated centres:			
City Centre	200	120	70
Designated town centres	120	70	50
Other designated centres	70	50	35
Public transport stops:			
Main rail stations and Metrolink stops in the City Centre	N/A	200	120
Other rail stations and Metrolink stops in large designated centres	N/A	120	70
Other rail stations with a frequent service and all other Metrolink stops	N/A	70	50
Areas within GMAL 6 and above	50	35	35
All other locations: minimum net residential density of 35 dwellings per hectare			

4.30 The policy states that 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.

4.31 In order to deliver a mix of housing, the densities above should typically be delivered as follows:

- 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 possible 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 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 2019) 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 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;
- Market conditions.

4.38 In order to establish realistic delivery rates, some 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. To be meaningful, this analysis can only include larger sites of at least 50 dwellings and those being built by private developers. Other 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.

4.39 This found that the average lead-in time between permission and first commencement was approximately 6 months and that an average of 40 dwellings per year were completed. However, there have been relatively few large-scale, fully private developments in recent years and more evidence will need to be gathered to establish this as a consistent trend. A relatively modest completion rate assumption of 30 dwellings per year has therefore been used in this SHLAA, unless additional information known about individual sites suggests that a higher or lower delivery rate should be applied.

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

- Likely to be developed within 1 to 5 years (i.e. 01/04/19 to 31/03/2024);
- Likely to be developed within 6 to 10 years (i.e. 01/04/2024 to 31/03/2029);
- Likely to be developed 11 years plus (i.e. 01/04/2029 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.

Stage 3: Windfall Assessment

4.42 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.

4.43 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.

- 4.44** 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).
- 4.45** There will always be a large number of 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.
- 4.46** One way to calculate an indicative delivery rate is to identify all sites which would have been considered a “windfall” at the time it was first granted permission and calculate completions that have taken place on these sites. For historical data, it has proved difficult to establish whether some sites would have been windfalls as they may have been built out over a number of years and the original permission may pre-date the consistent monitoring data that is currently available. Therefore, the most practical period to choose for this analysis was to use the base date of the first full SHLAA of 1st April 2012. Initial results suggest that a relatively significant number of dwellings have been granted permission on such sites. However, this is not considered a long enough timeframe to establish a consistent trend, especially as there is inevitably some lag between sites gaining permission and completions coming forward.
- 4.47** Therefore, it is considered most appropriate not to have a windfall allowance until there is more evidence available. It is considered that windfall sites will continue to supply a relatively significant proportion amount of housing land and therefore, instead of a specific allowance, there is an assumption that if some sites identified in the housing land supply are not delivered in the timeframe anticipated, these will be replaced by windfall sites.

Approach to small sites in the planning system

- 4.48** The council does consider 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.
- 4.49** The allowance rate is based on an analysis of housing completions on small sites over a five year period 01 April 2014 to 31 March 2019. This shows that 250 homes have been completed on small sites in this period (an average of around 12% of all completions over this time), equating to an average of 50 homes per annum.

Table 4 Housing Completions on sites producing less than 5 dwellings 01/04/2014 to 31/03/2019

Year	Total completion on sites under 5 dwellings
2014/15	15
2015/16	25
2016/17	35
2017/18	86
2018/19	109
TOTAL	270
Average p.a.	54

4.50 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.

4.51 Table 4 shows that, based on the average number of homes delivered over the past five years, there could be an allowance of 810 dwellings applied from 1st April 2024 and beyond.

Clearance Allowance

4.52 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.

4.53 This SHLAA has analysed the actual number of planning permissions that would result in the loss of a dwelling (not including demolition and replacement which is already accounted for) and the results can be seen in Table 5.

Table 5 Clearance / loss of dwellings 01/04/2014 to 01/04/2019

Year	No. of dwellings included in permissions resulting in clearance/loss*	Has the loss taken place (no. of dwellings lost)?
2014/15	2	2
2015/16	6	1
2016/17	5	1
2017/18	6	1
2018/19	10	9
TOTAL	29	14
Average p.a.	5.8	2.8

4.54 *Not including sites where cleared dwellings are replaced by new dwellings

4.55 Table 5 shows that clearance/loss of dwellings to other uses has been minimal over the last five years, with 29 dwellings being granted permission for change of use or demolition and only 14 actual losses. A relatively small clearance allowance of 4 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.

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 01/04/19);
- Sites with extant residential planning permission as at 01/04/19;
- Saved housing allocations (UDP Phase 1 and 2);
- Lapsed and Stalled housing sites;
- Potential 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.

Please note that these findings are based on the housing land supply position as at 1st April 2019. 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 1 for full listing of sites.

5.3 The tables below provide a summary of the capacity of sites in the overall land supply. Table 6 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 6 Ward Summary of Housing Land Supply

Ward	Years 0 to 5	Years 6 to 10	Years 11+	Total
Alexandra	14	228	117	359
Chadderton Central	166	225	349	740
Chadderton North	3	58	91	152
Chadderton South	37	151	204	392
Coldhurst	133	68	339	540
Crompton	6	5	0	11
Failsworth East	96	280	10	386
Failsworth West	349	105	43	497
Hollinwood	142	210	71	423
Medlock Vale	244	199	33	476
Royton North	70	24	123	217
Royton South	70	234	123	427
Saddleworth North	94	225	101	420
Saddleworth South	111	159	24	294
Saddleworth West & Lees	107	309	31	447
Shaw	113	93	127	333
St James'	200	222	91	513
St. Mary's	176	845	1036	2057
Waterhead	129	158	112	399
Werneth	121	418	5	544
Total	2,381	4,216	3,030	9,627

5.4 See appendix 1b for a full breakdown of sites by ward and appendix 2 for a borough map showing the sites.

Sites Under Construction

5.5 Table 7 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 1st April 2019. 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 ground works. Table 7 shows that there were 1,203 dwellings available on 109 sites that were under construction as at 1st April 2019. Sites in this category are included in the current five year housing land supply.

Table 7 Sites Under Construction

SHLAA Category	Total Dwellings 2019-2024	Total Dwellings 2024-2029	Total Dwellings Years 11+	Total Dwellings - All Periods
Sites under construction	1,203	0	0	1,203

Sites with an Extant Planning Permission

5.6 Table 8 above shows sites within the supply that had an extant (current) full or outline planning permission for residential development (including mixed use sites), as at 1st April 2019. It shows that there were 1,406 dwellings available on 181 sites with an extant planning permission for housing as at 1st April 2019. This includes saved UDP Phase 2 allocation Holden Fold Lane (H1.2.13) which had outline permission for 12 dwellings as at 1st April 2019 (and which has since had reserved matters approval).

Table 8 Sites with Extant Planning Permission

SHLAA Category	Total Dwellings 2019-2024	Total Dwellings 2024-2029	Total Dwellings 11+	Total Dwellings - All Periods
Sites with extant planning permission	745	461	200	1,406

5.7 Sites in this category are included in the current five year housing land supply if they have a full planning permission for residential or, for sites with only outline permission, there is evidence to suggest they will be delivered within five years. For large sites of over 150 dwellings it is expected that, based on a delivery rate of 30 dwellings per year, some dwellings will be delivered beyond year 5.

Saved UDP Housing Allocations

5.8 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.

- 5.9** The saved UDP housing allocation policy sets out that Phase 1 housing allocations are considered to be a priority for development. Some of these are therefore included in the five year supply if there is evidence to suggest they are deliverable in the short term. 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 (with the exception of Phase 2 site H1.2.13 Holden Fold Lane, Royton which is included in the five year supply).
- 5.10** All allocations will be subject to a comprehensive review as part of the revised Local Plan preparation, although they are not fully assessed in this SHLAA they are considered capable of being delivered within the short, medium and long term. Table 9 shows that there were 810 dwellings available on 16 sites within the remaining housing allocations without permission as at 1st April 2019. This includes 63 dwellings on sites considered deliverable in the short term and 747 dwellings on sites considered deliverable in the medium to long term. A number of these sites have received planning permission after the monitoring period or are pending decisions on planning applications - these will be presented as appropriate in future updates of the SHLAA.

Table 9 Saved UDP Housing Allocations

SHLAA Category	Total Dwellings 2019-2014	Total Dwellings 2024-2029	Total Dwellings 11+	Total Dwellings - All Periods
Saved UDP Phase 1 Housing Allocations	0	374	0	374
Saved UDP Phase 2 Housing Allocations	63	351	22	436
Total Saved UDP Housing Allocations	63	725	22	810

Lapsed and Stalled Sites

- 5.11** 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 (i.e. before the previous NPPF was published).
- 5.12** 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 Section 4.48). There is a general presumption that sites within this category remain deliverable, unless there is a known constraint which would impede their future development.

Table 10 Lapsed and Stalled Sites

SHLAA Category	Total Dwellings 2019-2024	Total Dwellings 2024-2029	Total Dwellings 11+	Total Dwellings - All Periods
Lapsed and Stalled sites >5 dwellings	0	591	402	993

5.13 Table 10 shows that there were 993 dwellings available on 43 sites in this category. Of these, 591 dwellings are considered deliverable within the medium term and 402 in the long term. Although they have the advantage of previously receiving planning permission for housing, sites that are only 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.

Potential Sites

5.14 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). 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.

5.15 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 in 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 to another site;
- 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.

- 5.16** Please note that there are some sites in this category that have recently gained or are likely to gain planning permission for housing, including Shaw Hall Bank, Grasscroft (SHA0103) which was granted planning permission (subject to legal agreement) for 20 dwellings in June 2019. For the purposes of this SHLAA, these sites remain in the “potential” category as this is the status they had at 1st April 2019.
- 5.17** 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 1st April 2020. Additionally, there are some potential sites where there may be no policy restrictions preventing them from coming forward in the short term. These may form part of the five year supply in future updates.
- 5.18** Table 11 shows that there were 5,215 dwellings available on 97 “potential” sites as at 1st April 2019. Of these, 370 dwellings are considered deliverable in the short term (those with, or pending, planning permission); sites which have the potential to provide 2,439 dwellings are considered deliverable in the medium term and sites providing 2,406 dwellings are considered to have potential in the longer term.

Table 11 Potential Sites

SHLAA Category	Total Dwellings 2019-2024	Total Dwellings 2024-2029	Total Dwellings 11+	Total Dwellings - All Periods
Potential Sites	370	2,439	2,406	5,215

Location of sites

- 5.19** Appendices 1 to 3 set out the location of all sites identified within the SHLAA. Appendix 1 presents the housing land supply sites in tables based on the site category. These are accompanied by an overall borough map showing all the sites in Appendix 2. Appendix 3 provides a more detailed assessment of each new “potential” site identified as part of the SHLAA 2019.

Discounted sites

- 5.20** 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 to test the appropriateness of previously defined constraints. There were 205 discounted sites identified - the list is set out in Appendix 4.
- 5.21** The “discounted” sites are currently constrained for housing, either because of physical or planning policy restrictions or are otherwise considered unsuitable, unavailable or unachievable. These sites have been sub-divided into a number of categories depending on the reasons for discounting.
- 5.22** 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

- 5.23** 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.
- 5.24** 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 site 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

- 5.25** 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 secured.
- 5.26** 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).
- 5.27** 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)

- 5.28** 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 to determine whether it should remain as protected land (albeit possibly under an amended policy designation).
- 5.29** 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 OPOL review are available and this is explored through the Local Plan process. Any OPOL which forms part of a GMSF allocation is being assessed separately.

Discounted – open space

- 5.30** The SHLAA has considered a number of 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 being disposed of or are for possible disposal at some point in the future.
- 5.31** On the whole, existing open space is 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. Future suitability assessment 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

- 5.32** 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. Those Green Belt sites which form part of the GMSF allocations are being assessed separately.

Discounted – other

- 5.33** 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

- 5.34** Table 12 identifies the potential capacity from the discounted sites if the identified in-principle constraints could be removed. This shows that there could be 23,660 dwellings available on 205 sites which are currently discounted as at 1st April 2019. These figures show that the potential from constrained sites could be significant and includes a large potential capacity of 2,213 dwellings on 67 mill sites within BEAs, SEAs and other employment areas.
- 5.35** However, it must be borne in mind that the capacity is based only on a rough estimate using a standard density of 35 dwellings per hectare multiplied by the net developable area of the site (80% 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 Green Belt sites.
- 5.36** 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 proportion of this capacity will be achieved.

Table 12 Discounted sites - potential capacity

Discounted Site Category	Number of sites	Indicative capacity
Sites in BEAs/SEAs	41	1,305
Other active employment sites	35	1,418
Discounted OPOL (this includes all OPOL, some of which is considered undevelopable e.g. river valley)	26	7,589
Discounted existing open space	19	444
Discounted other	2	16
Discounted Green Belt	82	12,888
TOTAL	205	23,660

Update on SHLAA 2018 sites

5.37 Appendix 5 provides an update on sites that were part of the housing land supply in the previous published SHLAA 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 it's 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 2028/29 and beyond.
- 6.2** Following consultation in 2018, the Ministry of Housing and Local Government (MHCLG) introduced a standard methodology for calculating local housing need in February 2019. Oldham's current local housing need based on this standard methodology is 692 new homes per year. The draft GMSF published in January 2019 set a housing requirement for Oldham of 752 new homes per year. This requirement represents a significant increase on the previous housing requirement of 289 homes per year set out in the current Local Plan. The following section presents Oldham's current five year and post five year housing land supply trajectory, against the current housing requirement.
- 6.3** The housing trajectories take account of all sites identified in the housing land supply set out in the SHLAA for years 0-5 and beyond and shows the net additional dwellings which are expected over this time period. It takes account of projected clearance (which is 4 dwellings per annum) and the small sites allowance of 54 dwellings per annum (applied from year 6 onwards).

Recent completions

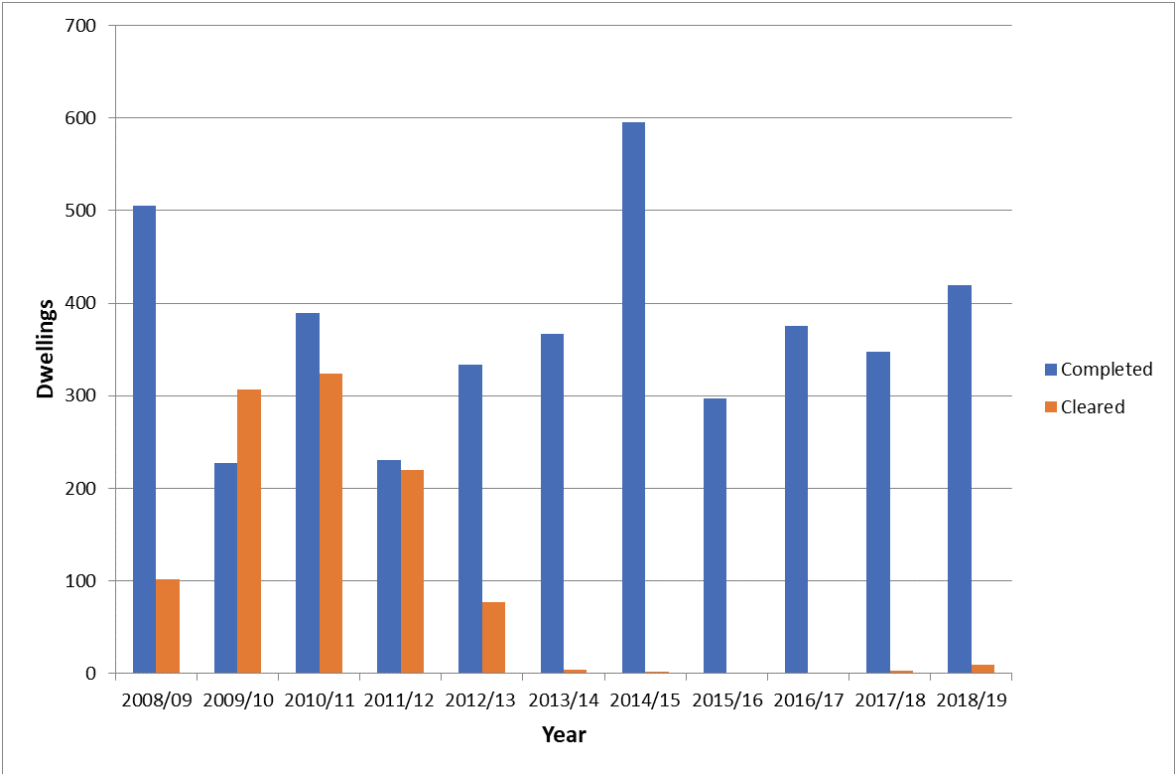
6.4 Table 13 and Figure 2 below provide information on the number of housing completions since 2008/09 to 2018/19. These have been amended following a monitoring anomaly which identified 119 missed completions from 2008/09, to backdate the missed completions into the relevant years. This is fully set out within the Authorities Monitoring Report 2019, available at: <https://www.oldham.gov.uk>

Table 13 Housing Completions 2008/09 to 2018/19

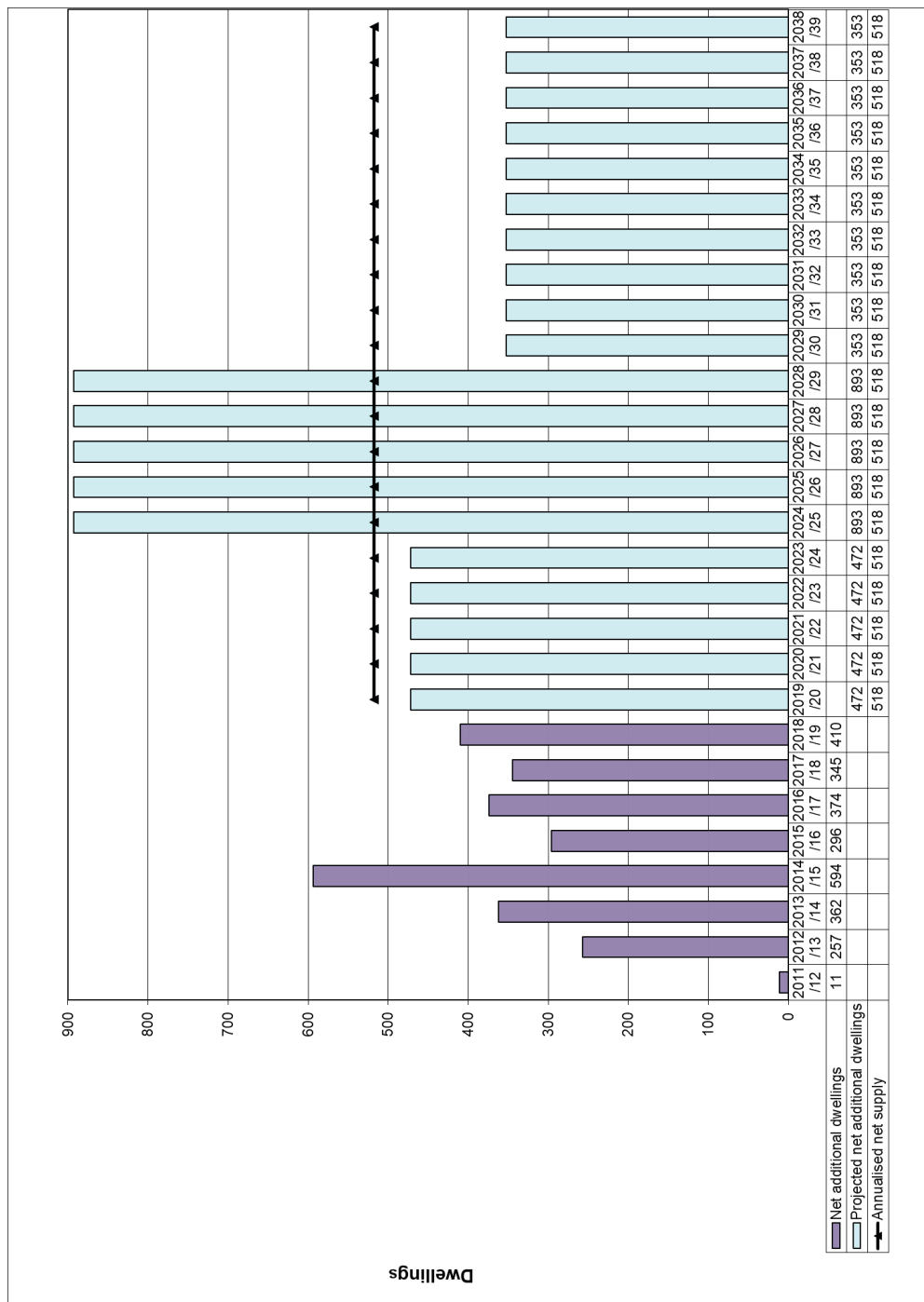
Year	Completed (Net)	Variance (against housing requirement)*
2008/09	403	114
2009/10	-80	-369
2010/11	65	-224
2011/12	11	-278
2012/13	257	-32
2013/14	363	74
2014/15	594	305
2015/16	296	7
2016/17	374	85
2017/18	345	56
2018/19	410	-282
Total	3,038	-544

*prior to 2018/19 the housing requirement was as set out in the adopted Local Plan, at 289 homes per year. For 2018/19 onwards, this Housing Requirement has changed as per the introduction of the standard methodology by MHCLG, to 692 homes per year.

Figure 2: Housing Completions 2008/09 to 2018/19



Housing Trajectory



- 6.5** Compared to past completions, the above trajectory illustrates that there is expected to be an increase in the annual average completion rate over the next five years (2019/20 to 2023/24) with 2,359 net completions over this period (taking account of expected clearance). This equates to an annual average of 472 dwellings over this 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.

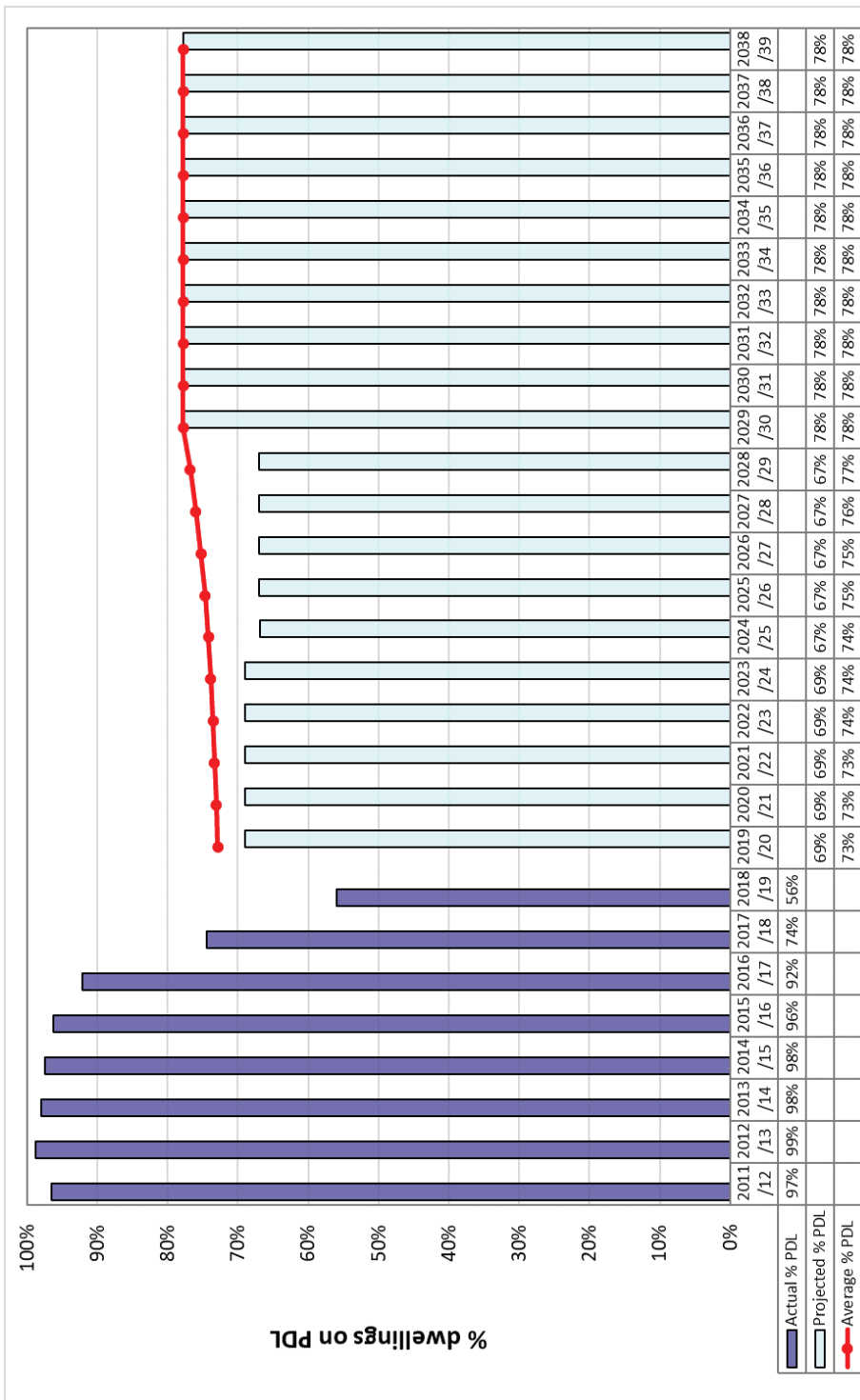
Post Five-Year Supply

- 6.6** The trajectory indicate that a further 7,995 dwellings are expected to be delivered beyond the next five years. 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

- 6.7** In 2018/19, 56% of dwellings were completed on previously developed (brownfield) land in Oldham. The previously developed land (PDL) trajectory shows:
- Projections for the next five years show that 69% 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.
- 6.8** 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 334 dwellings on mixed sites (14% of the five-year supply). The post five-year housing land supply includes 1,239 dwellings on mixed sites (17% of the post five-year supply).
- 6.9** In total 83% of the five-year housing land supply and 88% of the post five-year housing land supply is made up of previously developed land or mixed sites.

Previously Developed Land Trajectory



7 Conclusion

- 7.1** This SHLAA report provides a snapshot of the housing land supply position as of 1st April 2019. 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 MHCLGs standard methodology is 692 new homes per year. Projected clearance is considered within the SHLAA and will need to met on top of the housing need figure.
- 7.4** This requirement represents a significant increase on the previous housing requirement of 289 homes per year set out in the current Local Plan. Whilst the SHLAA demonstrates that there is a considerable amount of potential housing land currently available, with the majority of this being brownfield, there will be a need to identify further land if future housing targets are to be met.

7.5 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 3a Potential Sites Ward Maps

Appendix 3b Detailed 'New' Potential Site Assessment Tables

Appendix 4 SHLAA Discounted Sites

Appendix 5 Update on 2018 SHLAA Sites