Oldham Local Plan

Local Plan Review: Issues and Options Housing Topic Paper

July 2021

Oldham Council

1 Introduction

1.1 This Housing Topic Paper is one of a series that has been prepared as part of the process of evidence gathering to support the review and preparation of Oldham's Local Plan.

1.2 The full range of Topic Papers deal with the following:

- Housing
- Economy and Employment
- Our centres (incorporating retail)
- Communities (incorporating community facilities, health and well-being, education and infrastructure etc).
- Natural Environment (incorporating Green Belt, Other Protected Open Land, nature conservation designations and wider Green Infrastructure including open space, sport and recreation provision)
- Built Environment (incorporating design, heritage)
- Transport
- Climate Change, Energy and Flood Risk
- Site Allocations

1.3 The principal aim of the Topic Paper is to set out current key policies, plans and strategies relating this topic area that will form the basis for the development of the Local Plan. The Topic Papers will present a profile of the borough and highlight key issues and opportunities that the Local Plan should seek to address. Helping to shape and influence the direction and focus of the Local Plan's planning policies, designation and site allocations.

1.4 It is intended that the Topic Papers will be 'living' documents that can be updated as we progress through the preparation of the Local Plan, carry out further consultation and complete additional evidence.

2 Key Policies, Plans and Strategies

National Context

National Planning Policy Framework (NPPF)

2.1 Paragraph 8 sets out the three overarching objectives for achieving sustainable development. These include a social objective which seeks 'to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations'.

2.2 To deliver sustainable development in a positive way paragraph 11 sets out a presumption in favour of sustainable development, which in terms of plan-making means that:

a) 'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.

2.3 Chapter 5 (Delivering a sufficient supply of homes) sets out a number of requirements regarding boosting the supply of homes. The key elements are as follows:

- Paragraph 60 states that strategic policies should be based upon a local housing need assessment, conducted using the standard method set out in national planning guidance.
- Paragraph 61 states that policies should identify the size, type and tenure of homes needed for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.
- Paragraphs 62 to 64 sets out the requirements in relation to affordable housing:
  - Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met onsite in the first instance, unless off-site provision or an appropriate financial contribution can be robustly justified or the agreed approach contributes to the objective of creating mixed and balanced communities;
  - Affordable housing should not be sought for developments that are not on major sites;

- To support the re-use of brownfield land, where vacant buildings are being re-used or redeveloped, any affordable housing contribution should be reduced by a proportionate amount;

- Where major housing development is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significant prejudice the ability to meet the identified affordable housing needs of specific groups. There are also exemptions to this requirement where the site or proposed development provides solely for Build to Rent homes, provides specialist accommodation for people with specific needs, for self-build or custom build homes or is exclusively for affordable housing.

- Paragraphs 65 to 66 sets out the requirements in relation to establishing a housing requirement figure. This requirement should be for the whole area and show the extent to which identified housing need can be met over the plan period. This should include a housing requirement for identified neighbourhood areas within the overall requirement, which should not need re-testing at the neighbourhood plan examination, unless there has been a a significant change in circumstances that would affect the figures.

- Paragraphs 67 to 70 sets out the requirements for identifying land for homes, stating that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a Strategic Housing Land Availability Assessment (SHLAA). Section ** of this report will outline the council's SHLAA in more detail. The SHLAA will look at the availability, suitability and likely economic viability of sites and will then be used to inform planning policies which identify a sufficient supply and mix of housing sites. These policies should identify a supply of:

  - specific, deliverable sites for years one to five of the plan; and
  - specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

- To promote the development of a good mix of sites local planning authorities should identify land to accommodate at least 10% of their housing requirement on sites of one hectare or less through a variety of means including allocations, tools such as design assessments and Local Development Orders, supporting the development of windfall sites and addressing mechanisms for delivery.

- Provision is made for the development of entry level exception sites, suitable for first time buyers, unless the need for such homes is already being met within the authority's area. These should be outside existing settlements, on land which is not already allocated for housing.

- Paragraphs 73 to 76 set out the requirements in relation to maintaining supply and delivery:

- Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their adopted housing requirement, or against their local housing need where strategic policies are more than five years old (unless they have been reviewed and found not to need updating). The supply of specific deliverable sites should also include a buffer of between 5%, 10% or 20% depending upon whether an annual position statement is prepared and agreed and having regards to past performance.

2.4 The NPPF also sets out details regarding the Housing Delivery Test, stating that where the test indicates that delivery has fallen below 95% of the Local Planning Authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.

2.5 Chapter 11 sets out the requirements relating to 'making effective use of land':

- Planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should contain a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land, including:
  - promoting and supporting the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively; and
  - supporting opportunities to use the airspace above existing residential and commercial premises for new homes; and

2.6 It also sets out that local planning authorities should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs.

2.7 Paragraphs 122 and 123 set out the approach to achieving appropriate densities, stating that planning policies should support development that makes efficient use of land, having regard to:

- the identified need for housing and other forms of development, and the availability of land suitable for accommodating it;
- local market conditions and viability;
- the availability and capacity of infrastructure and services;
- the desirability of maintaining an area's prevailing character (including residential gardens), or of promoting regeneration and change; and
- the importance of securing well-designed, attractive places.

2.8 Paragraph 123 sets out that where there is an existing or anticipated shortage of land for meeting identified housing needs, planning policies (and decisions) should avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

2.9 In addition to the above, other relevant sections of NPPF include:

- Chapter 7 on 'Ensuring the vitality of town centres' states that planning policies should recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.
- Paragraph 107 states that maximum parking standards for residential (and non-residential) development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network.

National Planning Policy Guidance

Brownfield land registers (2017)

2.10 Brownfield land registers are intended to provide up-to-date and consistent information on previously developed land that are considered to be appropriate for residential development. For certain sites on the register, authorities are able to trigger a grant of permission in principle for residential development where they follow the required procedures. More detail on Oldham Council's brownfield land register can be found in section 3.

Build to rent (2018)

2.11 NPPF defines "build to rent" as purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

2.12 The guidance on build to rent states that local planning authorities should take account of the need for a range of types and tenures including for those who wish to rent. If a need is identified, there should be a policy setting out the approach to promoting and accommodating build to rent which recognises the circumstances and locations where such provision will be encouraged (such as part of a large site or in town centre regeneration areas).

2.13 The guidance goes on to provide detail on the amount of build to rent that it is expected to be provided, how affordable rent is calculated, how such schemes can be managed and the quality standards which are to be applied.

First Homes (2021)

2.14 The guidance sets out the Government's latest affordable housing scheme - 'First Homes'[1]. Consultation on the proposals ended in May 2020 and the government published a summary of consultation responses in August 2020. First Homes will soon become legislation and changes to national planning policy and the guidance coming into effect on 28th June 2021.

2.15 First Homes are intended to help first time buyers into home ownership in the communities they want to live in. Key workers and armed forces personnel would also be eligible for the scheme. Specific local connection restrictions may therefore be applied to those who are eligible, supported by appropriate evidence.

2.16 First Homes are a type of 'affordable housing'[2] whereby homes will be offered at a discounted market sales value. Specifically, the national standard for First Homes is that:

- they must be discounted by a minimum of 30% against the market value;
- after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London); and
- the home is sold to a person who meets the First Homes eligibility criteria.

2.17 The First Homes eligibility criteria is set out as:

- A purchaser (or, if a joint purchase, all the purchasers) of a First Home should be a first-time buyer as defined in paragraph 6 of schedule 6ZA of the Finance Act 2003 for the purposes of Stamp Duty Relief for first-time buyers;
- Purchasers of First Homes, whether individuals, couples or group purchasers, should have a combined annual household income not exceeding £80,000 (or £90,000 in Greater London) in the tax year immediately preceding the year of purchase;
- A purchaser of a First Home should have a mortgage or home purchase plan (if required to comply with Islamic law) to fund a minimum of 50% of the discounted purchase price; and
- These national standard criteria should also apply at all future sales of a First Home.

2.18 The guidance sets out that council's can set higher discounts than the minimum 30% proposed or a lower sales price cap, to ensure they are affordable for local people. This must be supported by robust evidence, setting out identified need for alternative requirements.

2.19 In addition, to qualify as a First Home, a section 106 agreement should secure the necessary restrictions on the use and sale of the property, and a legal restriction on the title of the property, to ensure that First Homes, as a discounted market sale home, are retained in perpetuity (although the sales price cap will only apply to the first sale).

1 First Homes planning practice guidance: https://www.gov.uk/guidance/first-homes
2 As defined in NPPF Annex 2.

2.20 First Homes will be delivered through two routes within the planning system: as a proportion (25%) of section 106 affordable housing contributions and through an amendment to the policy on entry-level exception sites.

2.21 For residential developments, once a minimum of 25% of First Homes has been accounted for, the remainder of the affordable housing tenures should be delivered in line with the proportions set out in the local plan policy.

Design: process and tools (2019)

2.22 The PPG sets out that well-designed places can be achieved by taking a proactive and collaborative approach at all stages of the planning process, from policy and plan formulation through to the determination of planning applications and the post approval stage. The guidance should be read alongside the National Design Guide, which sets out the characteristics of well-designed places and demonstrates what good design means in practise.

National Design Guide (2019)

2.23 The Design Guide outlines the components for good design, including a consideration for the context for places and buildings; hard and soft landscaping; technical infrastructure and social infrastructure; sets out a National Model Design Code and provides good practise examples.

2.24 In terms of homes and buildings, the Guide sets out that well-designed homes and buildings are functional, accessible and sustainable. They provide:

- good quality internal and external environments for their users, promoting health and well-being;
- relate positively to the private, shared and public spaces around them, contributing to social interaction and inclusion; and
- resolve the details of operation and servicing so that they are unobtrusive and well-integrated into their neighbourhoods.

Housing and economic needs assessment (2020)

2.25 This guidance has been updated in line with the government's new standard method for calculating local housing need (as published in December 2020). It relates specifically to the standard methodology for assessing housing need, to ensure consistency in meeting the government's aim of boosting the housing supply. The PPG defines housing need as an unconstrained assessment of the number of homes needed in an area and is the first step is deciding how many homes should be planned for. It is undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies on, for example, site allocations.

2.26 PPG expects the standard methodology set out in this guidance to be followed when assessing local housing need, unless there are exceptional circumstances which warrant an alternative approach. The method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected housing growth and previous under-supply. It identifies a minimum annual housing need, not a housing requirement.

2.27 The guidance goes through a number of steps in calculating the local housing need figure. This involves firstly setting the baseline using national household growth projections and then adjusting these against affordability in the area. The new standard methodology has introduced a 35% uplift on the need figure determined through the standard method for the top 20 cities and urban areas in England, which includes the Greater Manchester authority of Manchester.

2.28 Strategic plan-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This should then be kept under review and revised where appropriate, for example when household projections and affordability ratios are updated by the Office of National Statistics (ONS).

2.29 The guidance also discusses the need for different types of housing for particular groups as part of the overall housing need. The standard method does not break down the need figure into different housing types, so the need for particular sizes, types and tenures of homes should be considered separately.

Housing and economic land availability assessment (2019)

2.30 This guidance outlines the purpose of the assessment of land availability (for housing, this is the Strategic Housing Land Availability Assessment - SHLAA) and sets out a methodology for carrying this out. The council's latest SHLAA has a base date of 1 April 2020 and is summarised within section 3.

Housing: optional technical standards (2015)

2.31 This provides guidance on how planning authorities can gather evidence to set optional requirements and the nationally described space standard. Issues discussed include standards such as accessibility, adaptability and wheelchair standards, water efficiency and internal space standards in new homes.

Neighbourhood planning (2020)

2.32 This guidance states that neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area, for example giving them the ability to choose where they want new homes.

Plan-making (2020)

2.33 This states that strategic policy-making authorities are required to cooperate with each other, and other bodies, when preparing strategic policies. It makes reference to NPPF which asks authorities to produce a statement of common ground. This is a written record of the progress made by strategic policy-making authorities with strategic cross-boundary matters. This is expected to contain key strategic matters such as meeting the housing need in the area, the housing requirements in any adopted and emerging strategic policies relevant to housing.

2.34 It also refers to the need for authorities to have a clear understanding of housing needs in their area, including identifying the overall housing need, preparing a SHLAA and a viability assessment to ensure that housing policies are realistic. It also gives guidance on updating housing policies and the implications for the Housing Delivery Test.

Self-build and custom house building (2021)

2.35 This describes what self/custom build housing is and the duty on authorities to keep a register of people who are seeking to acquire serviced plots of land for this type of home. This type of building is where an individual or association of individuals build homes to be occupied by themselves. In considering whether a home falls under this definition, the authority must be satisfied that the initial owner of the home will have primary input into its final design and layout. More details on Oldham Council's self-build and custom housebuilding register can be found in section 3.

Viability (2019)

2.36 This advises that development plans should set out the contributions expected from development, which includes the levels and types of affordable housing provision required. It emphasises that viability assessment is best undertaken at plan making stage, allowing sites to be deliverable, without the need for further assessment at the decision making stage.

Planning for the Future - Planning White Paper (2020)

2.37 On the 6th August 2020, the Government published their Planning White Paper, entitled Planning for the Future. The White Paper, proposed a fundamental reform of the planning system with the intention to streamline and modernise the planning process, bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed. The White Paper proposed 24 main changes upon which views were sought through the consultation. The main changes proposed in relation to housing were as follows:

- Simplifying the Local Plan system to identify three types of land – “Growth” areas that are “suitable for substantial development”, “Renewal” areas “suitable for development”, and areas that are “Protected”;
- Growth areas “would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building”;
- Changes to how local housing need is assessed, seeking to address housing affordability and having regard to local constraints. A new standard method would be a means of distributing the national target of 300,000 new homes annually, and one million homes by the end of the Parliamentary term; and
  Housing Delivery Test and Presumption in Favour of Sustainable Development to be retained.

2.38 In parallel, the Government also released a more technical consultation paper for consultation until 1 October 2020[3] This sought views on a range of matters, including:

- The Government’s proposals to change how local housing need is assessed (as flagged in the White Paper);
- How the “First Homes” home ownership scheme will be delivered through the planning process;

3 'Changes to the current planning system', available at: Government response to the local housing need proposals in “Changes to the current planning system” - GOV.UK (www.gov.uk)

- Extending “Permission in Principle” to major development; and
- Measures to assist small and medium size housebuilders, and new entrants to the housing market.

2.39 The government is still analysing feedback from the consultations on both papers, however has provided a response in relation to changes to the standard method for assessing local housing need (the ‘standard method’) and First Homes as contained within the technical paper. Further information on the papers and the government response to the consultation so far, is available online at: Government response to the local housing need proposals in “Changes to the current planning system” - GOV.UK (www.gov.uk).

Housing White Paper (2017)

2.40 The Government's 2017 Housing White Paper 'Fixing our Broken Housing Market' set out many of the policy approaches that were subsequently implemented through the revised NPPF and PPGs. The main premise of this is the historic lack of housebuilding - leading to acute shortages in places and widespread lack of affordability - and the need to significantly boost the number of homes being delivered. The causes of the housing shortage were identified in the paper as being: not enough local authorities planning for the homes needed; housing building that is too slow; and a construction industry that is too reliant on a small number of large developers.

2.41 The document had key messages and recommendations for a number of professions, including local authority planners, housing associations, housebuilders, developers and infrastructure providers. It first introduced the "standard" methodology for calculating housing need, it set intentions to make the planning system more open and accessible and tackle unnecessary delays and set out how the government would ensure more houses are built, through measures such as the housing delivery test.

2.42 A supplement document, "Planning for the right homes in the right places" was issued for consultation later in 2017, developing the proposals first put forward in the white paper. This included more detail on the standard methodology for housing need, more information on neighbourhood planning's role in delivering housing and the use of viability assessments.

2.43 Some measures contained within this paper were later reintroduced in the 'Planning for the Future' White Paper.

Planning Policy for Traveller Sites (2012)

2.44 This document sets out the Government's planning policy for traveller sites, with the aim being to ensure fair and equal treatment for travellers which facilitates their traditional and nomadic way of life whilst respecting the interests of settled residents. It includes guidance on assessing the need for traveller sites, encouraging local authorities to plan for sites, to promote more private site provision as well as recognising that provision of their own sites is not always possible, reducing the number of unauthorised encampments and increasing the number of sites in appropriate locations with planning permission and ensuring Local Plans include fair, realistic and inclusive policies.

The Town and Country Planning (Brownfield Land Register) Regulations (2017)

2.45 The Town and Country Planning (Brownfield Land Register) Regulations 2017 require local authorities to prepare, maintain and publish a register of brownfield land. The purpose of the register is to provide up-to-date and consistent information on previously developed land that the local authority considers to be appropriate for residential development.

2.46 For the purposes of the register, brownfield land is the same as the definition of previously developed land set out in Annex 2 of the National Planning Policy Framework (NPPF): "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape".

2.47 The register is comprised of two parts:

- Part 1 comprises all brownfield sites (which meet the criteria as set out in the regulations) that have been assessed as suitable for residential development and could include sites with or without planning permission; and
- Part 2 identifies sites that the local authority has decided should be granted (planning) permission in principle (PiP) for residential development. PiP is an alternative route to obtaining planning permission which separates "in principle" matters, such as use and location, from technical details, which are left to be agreed later. The theory is that this will provide greater certainty earlier on in the planning process, making it easier for developers to commit resources to a scheme in the knowledge that the principle of development has already been established and they only need to agree the details.

2.48 Local authorities are required to update the information relating to each entry and review the sites on their registers at least once a year. Regulation 4 of the Brownfield Land Register Regulations 2017 states that the register must include all parcels of brownfield land of at least 0.25 hectares in size, or capable of supporting at least 5 dwellings, that the council considers to be suitable and available for residential development and that is considered achievable. Sites below these thresholds can also be included on the register at the discretion of the local authority. In terms of assessing the sites, sites on the brownfield register must be:

- Suitable for residential development (including any site which: has been allocated for housing in the Local Plan; has planning permission for housing; or is, in the opinion of the council, appropriate for housing having regard to any adverse impact on the natural or local built environment);

- Available for residential development, where there is known landowner or developer interest, or there are no issues relating to ownership or other legal impediments preventing residential development.

- Achievable, meaning that the council considers that residential development is likely to take place within 15 years of the entry date on the register.

2.49 Regulation 4 also sets out that sites included on the register must be wholly brownfield land. Sites which are a mixture of brownfield and greenfield land are not included on the register.

2.50 The first Brownfield Land Register for Oldham was published at the end of the 2017, with an update in 2018, 2019 and most recently in December 2020. The council does not propose to progress Part 2 of its brownfield register at this time.

2.51 Further information on Oldham's Brownfield Register is contained within section 3 of this topic paper.

Self-build and Custom Housebuilding Register

2.52 Local authorities in England are required to research demand for self-build plots in their area and from 1st April 2016 the Self-build and Custom Housebuilding Act 2015 obliges them to maintain a list of people and groups interested in building their own homes.

2.53 Oldham Council was awarded Vanguard status for self and custom build, under the Government's Right to Build pilot scheme, and the register is part of the council's plans to make it easier for people who would like to build their own houses to get their projects off the ground. By asking interested parties to sign up to the register the council is able to find out more about the number and location of sites which are required in Oldham, and the types of houses that people would like to construct or have built for them. This will also helps the council to work with partners to develop the projects which people want in the borough.

2.54 Being a Vanguard Council, Oldham has been working on a number of approaches to promoting self and custom build, including:

- Providing guidance and information to support interested parties in progressing their aspiration to deliver their custom build development;
- Identifying council-owned sites which may be suited to custom build and preparing them for ease of development;
- Seeking developer-led custom build homes on council-owned sites which are already being marketed for new homes;
- Working with Community Build Werneth Ltd. to develop 37 bespoke homes on land which the council has sold to the group at open market value.

2.55 Further analysis of the self/ custom build register is available within the evidence base section of this topic paper.

Rural Exception Sites

2.56 Rural exception sites are defined by NPPF as "small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the Local Planning Authority's discretion, for example where essential to enable the delivery of affordable units without grant funding." [(4)].

2.57 NPPF states that in rural areas, local planning authorities should support opportunities to bring forward rural exception sites that would provide affordable housing to meet identified needs, and consider whether allowing some market housing on these sites would help to facilitate this. It goes onto to state that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. However, planning policies and decisions should avoid the development of isolated homes in the countryside unless special circumstances (listed under paragraph 79).

2.58 Rural exception sites are also listed under the exceptional circumstances for development in the Green Belt (NPPF, paragraph 145), whereby development in the Green Belt which relates to limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites). Planning policy also sets out that major developments on rural exception sites are also exempt from the affordable housing requirement of 10% (as set out under paragraph 64).

2.59 There are a number of more rural areas in the borough, mainly including parts of Saddleworth. Saddleworth has also been identified within the LHNA as having an identified need for affordable housing, which has also been cited as a key issue in retaining young people living within district. Furthermore, Saddleworth has higher than borough average house prices, meaning access to housing within the district is limited to those on a higher income. As such, there may be scope for the provision of affordable housing, such as through the allocation of a rural exception site, within Saddleworth. The scope for this may be further considered through the site allocations work and neighbourhood plans.

Vacant Building Credit

2.60 Vacant Building Credit (VBC) is intended to incentivise brownfield development, including the reuse or redevelopment of empty and redundant buildings.

2.61 NPPF sets out that where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the Local Planning Authority calculates any affordable housing contribution which will be sought as set out in their Local Plan[(5)]. Affordable housing contributions may be required

4 Annex 2 Glossary - Rural Exception Sites (https://www.gov.uk/government/publications/national-planning-policy-framework--2)

5 Paragraph 36; footnote 28.

for any increase in floorspace. The financial credit applies in calculating either the number of affordable housing units to be provided onsite or a contribution to off site provision.

2.62 An example is provided in planning guidance which sets out that where a building with a gross floorspace of 8,000 square metre building is demolished as part of a proposed development with a gross floorspace of 10,000 square metres, any affordable housing contribution should be a fifth of what would normally be sought[(6)].

2.63 Planning guidance sets out that in considering how VBC should apply to a particular development, local planning authorities should have regard to the intention of national policy. In doing so, it may be appropriate for authorities to consider:

- whether the building has been made vacant for the sole purposes of re-development; and
- whether the building is covered by an extant or recently expired planning permission for the same or substantially the same development

2.64 VBC does not apply to abandoned buildings. Planning guidance sets out that in deciding whether a use has been abandoned, account should be taken of all relevant circumstances, such as:

- the condition of the property;
- the period of non-use;
- whether there is an intervening use; and
- any evidence regarding the owner's intention.

2.65 Deciding whether VBC applies to a proposed development application is a case for the collecting authority to judge. As such, local authorities can set out their own policies and requirements for applying VBC, including setting out criteria for application and defining what constitutes a vacant building (including the required vacancy period). It may be appropriate to align VBC policy with employment policy relating to the loss of employment land to ensure consistency. For example by ensuring a marketing and viability statement is submitted alongside any application proposing to apply VBC, which sets out evidence relating to an appropriate marketing period as is defined in employment policy. This is to ensure that employment uses and sites are protected and are brought back into use where possible and appropriate.

2.66 It is important to ensure that developments on these sites still achieve sustainable development and provide high-quality homes which contribute to meeting local housing needs. As such development proposals seeking to apply VBC should still be considered as per the local plan policies as a whole, whilst ensuring brownfield land is brought back into positive use.

2.67 Furthermore, heritage assets, such as mills (as identified within the Mill Strategy), should be protected and enhanced where possible when considering VBC. VBC should support the conversion of mills identified as appropriate within the Mill Strategy, rather than facilitate demolition, where possible.

6 Planning Guidance: Planning Obligations, 027 Reference ID: 23b-027-20190315

2.68 When defining what constitutes a vacant building local plan policies can include specific criteria. In determining what criterion may be appropriate, a scoping exercise has been carried out which looks at planning guidance and best practice, arising from other local authorities VBC policies. The following criterion has been identified:

- The site must meet the NPPF definition of 'Previously Developed Land'[(7)];
- The building must meet the council's definition of a 'Vacant Building' and must not have been abandoned. The whole building should be vacant for VBC to apply;
- The building must not have been made vacant for the sole purposes of redevelopment. The applicant must demonstrate that vacancy has arisen for other reason; and
- If the proposal is covered by an extant or recently expired planning permission for the same or substantially the same development or has there been an application submitted but not determined since the VBC was reintroduced and VBC not sought, VBC will not apply.

2.69 Alternative criteria may also be appropriate.

2.70 A VBC policy can also identify an appropriate vacancy period in determining the length of time a building must have been vacant for before VBC can apply. Many authorities who have a VBC policy use the CIL definition of a 'vacant building', such as:

- a building that has not been in continuous use for any 6-month period during the last 3 years[(8)].

2.71 Oldham does not currently have CIL however the definition provides a clear vacancy period for measuring whether VBC applies.

2.72 It may also be appropriate to align the vacancy period with employment policies. For example, policy 14 (Supporting Oldham's Economy) of the current Local Plan set out that uses (other than those listed within the policy) will be permitted on sites currently or most recently used for employment purposes, provided that the applicant can clearly demonstrate that it is no longer appropriate or viable to continue the existing use. This can be demonstrated through a marketing exercise (agreed by the council) and/or a viability exercise. Currently, the council requires a marketing exercise to demonstrate that the building has been vacant for at least 12 months and appropriate steps have been taken to actively market the site for employment uses. Where possible this should be agreed with council prior to commencement.

2.73 As such, it may be prudent to reflect the employment policy, which at present, for example, would require buildings to be vacant for at least 12 months and any application to be supported by marketing evidence, for VBC to be applied (considering other criterion was met). As the employment policy is under review, identifying an appropriate vacancy period will be reviewed as appropriate in line with evidence, including the Employment Land Review.

7 NPPF, Annex 2 Glossary: 'Previously Developed Land'

8 The Community Infrastructure Levy (Amendment) (England) (No.2) Regulations 2019: Paragraph 1, Schedule 1

Housing our Ageing Population Panel for Innovation (HAPPI)

2.74 The panel has published a series of inquiry reports on Housing for an Ageing Population, known as HAPPI.

2.75 The HAPPI principles are based on 10 key design criteria. Many are recognisable from good design generally - good light, ventilation, room to move around and good storage - but they have particular relevance to older persons' housing which needs to both offer an attractive alternative to the family home, and be able to adapt over time to meet changing needs.

2.76 The principles reflect:

- Space and flexibility;
- Daylight in the home and in shared spaces;
- Balconies and outdoor space;
- Adaptability and 'care ready' design;
- Positive use of circulation space;
- Shared facilities and 'hubs';
- Plants, trees, and the natural environment;
- Energy efficiency and sustainable design;
- Storage for belongings and bicycles; and
- External shared surfaces and 'home zones'.

2.77 For local authorities, HAPPI recommends that:

- Their Local Plan gives the necessary priority to older people's housing needs – not least as a core component of any new settlements – and that new developments of retirement housing embrace HAPPI design principles;
- Policies should recognise the specialist nature of high-quality retirement housing and ensure that policy requirements do not make the delivery of such housing unviable;
- Appropriate sites are brought forward to meet any identified shortfall in market provision; and
- Support for housing association development for older people, which can free up affordable, under-occupied family homes.

Regional Context

Greater Manchester Strategy (GMCA, 2018)

2.78 The vision for the Greater Manchester Strategy is *'To make Greater Manchester one of the best places in the world to grow up, get on and grow old:*

- *A place where all children are given the best start in life and young people grow up inspired to exceed expectations;*

- *A place where people are proud to live, with a decent home, a fulfilling job, and stress-free journeys the norm. But if you need a helping hand you'll get it;*

- *A place of ideas and invention, with a modern and productive economy that draws in investment, visitors and talent;*

- *A place where people live healthy lives and older people are valued;*
- *A place at the forefront of action on climate change with clean air and a flourishing natural environment; and*
- *A place where all voices are heard and where, working together, we can shape our future.'*

2.79 The strategy for delivering this vision is structured around ten priorities, which include providing '*Safe, decent and affordable housing'.* The outcomes and targets for this priority are:

Table 1 Greater Manchester Strategy Outcomes/ Priorities

High quality housing, with appropriate and affordable options for different groups	By 2020, more than 10,000 net additional dwellings will be built per annum, up from 6,190 in 2015/16.
No one sleeping rough on Greater Manchester's streets.	End rough sleeping by 2020, from an estimated 189 rough sleepers in 2016.

2.80 The strategy sets out a number of ambitions and priorities are identified under this theme. These include:

- For Greater Manchester to become the UK's leading innovator in housing development;
- For all parts of Greater Manchester to be neighbourhoods of choice with good quality affordable homes in safe and attractive communities, well served by public transport, so that the people that live in them are connected to jobs and opportunity and have access to excellent local amenities, green spaces and high quality cultural and leisure offer;
- The need to create a housing offer to meet the needs and aspirations of existing and future residents;
- The Greater Manchester Spatial Framework (now Places for Everyone);
- The Greater Manchester Housing Investment Strategy, which will be put in place new models of development and investment to maintain a strong and continuing emphasis on directing new housing to brownfield land in urban locations;
- Increasing density of housing around public transport hubs;
- Developing Greater Manchester's town centres offer for housing as part of a broader approach to repurposing and reinvigorating our town centres;

- Supporting development in existing suburban areas which are attractive housing locations and seek to bring forward development in other neighbourhoods that have the attributes to attract and retain a high skilled workforce; and

- To reduce carbon emissions from housing through reducing energy efficiency and promoting decentralised energy generation in communities.

2.81 The strategy also recognises that it is not just about delivering new housing but also about improving the quality of our neighbourhoods. Creating neighbourhoods of choice, connected to opportunity with residents being able to enjoy an excellent quality of life. All this highlights that housing policy needs to be part of a wider 'place-making' approach along with education and skills, employment, transport, health, commercial development and public service reform.

Greater Manchester Housing Strategy (GMCA, 2019-2024)

2.82 The Strategy is based on and builds upon the Greater Manchester Strategy which, in terms of housing, sets out priorities to provide 'safe, decent and affordable housing' for Greater Manchester residents. The focus of the Housing Strategy is a recognition that housing is at the heart of many of the broader issues that Greater Manchester needs to tackle, including health, carbon reduction, tackling homelessness, providing skills and training residents, and growing our economy. The Housing Vision agreed by Greater Manchester Combined Authority (GMCA) in January 2019 is the precursor for the detail within this strategy, which will be complemented with an implementation plan to monitor progress. The Strategy is structured around three main elements - housing, people and place; existing stock; and new homes needed.

2.83 The vision is fundamentally that:

- those of us in need, homeless or at risk of becoming homeless can quickly access social housing or other affordable housing options to we can retain our place in the community; and
- no-one will need to sleep rough in GM.

2.84 For the 1.2 million existing homes within GM's stock:

- to receive the investment they need to meet and exceed modern requirements for their safety, warmth and physical accessibility. This includes retrofitting existing homes to meet GM's ambitions to be a carbon neutral city region by 2038;
- those homes will be part of neighbourhoods of choice, connected to economic opportunities and strategic infrastructure, and offering an excellent natural environment and quality of life for all parts of the community; and
- when we rent in either the social or private sector we can be confident that our homes will be well managed and safe, decent and affordable.

2.85 For new homes needed, the vision is:

- to consistently deliver the right homes in the right places, providing the number and mix of new homes for future needs of GM.
- that the new homes being built enhance the choice, affordability, quality and variety of housing available in their neighbourhoods, and are accompanied by

- transport, social and other infrastructure they need for their residents and the existing community to thrive, including schools, health facilities and green spaces;
- that the quality and design of new homes means a better match for the housing supply to the future housing needs and incomes of all GM's residents; and
- that the construction industry in GM is a centre of excellence and innovation, and an attractive employer for a new generation of skilled workers.

2.86 The strategy goes on to set out ambitions for housing in relation to health and social care; age-friendly GM; rough sleeping and homelessness; supported housing; safe and decent homes; fuel poverty, carbon reduction and retrofit, ownership and affordability.

2.87 The actions fall under two strategic priorities:

2.88 A safe, healthy, accessible home for all

1. Tackling homelessness and rough sleeping;
2. Making a positive difference to the lives of private tenants;
3. Developing healthy homes services to support vulnerable households;
4. Improving access to social housing for those who need it;
5. Identifying pathways to volume domestic retrofit and reducing fuel poverty

2.89 Delivering the new homes we need

- New models of delivery;
- Investing in truly affordable housing;
- Increasing choice in the housing market for Greater Manchester households.

Places for Everyone (PfE)

2.90 Places for Everyone: A Joint Development Plan Document of Nine Greater Manchester Districts is being jointly prepared, following Stockport's decision to withdraw in late 2020. The nine local Greater Manchester districts agreed that to address strategic matters such as housing need and economic growth as well as issues such as flood risk and strategic infrastructure, it would be best to work on a joint development plan - Places for Everyone. Once Places for Everyone is adopted, all nine Local Plans will be required to be in general conformity with it. As the proposed Places for Everyone evolves, strategic policies can be reflected in draft Local Plans.

2.91 In relation to housing, the key aspects Places for Everyone will cover which affect Oldham are:

- A review of the Green Belt boundary;
- The designation of strategic sites;
- Housing need up to 2037

2.92 For the purposes of this topic paper information on draft policies is as proposed in the GMSF Publication Plan Draft for Approval October 2020.

GMSF Publication Plan: Draft for Approval (October 2020)

2.93 In terms of housing, the GMSF Publication Plan Draft for Approval October 2020 set out that higher densities and town centre regeneration alongside the proposed strategic allocations demonstrate how the GMSF would deliver a mix of housing to meet the diverse needs of our communities and to support economic growth. The plan set a minimum target of 50,000 additional affordable homes to be provided over the plan period.

2.94 The Housing Vision and Housing Strategy set out above, provide further detail on type and mix of housing and affordable housing in a Greater Manchester context.

2.95 Chapter 7 'Homes for Greater Manchester' set out various policies for housing including:

2.96 **Policy GM-H 1** Scale of New Housing Development: a minimum of 201,000 new additional dwellings will be delivered in GM over the plan period 2018-2037, or an annual average of around 10,580;

2.97 **Policy GM-H 2** Affordability of New Housing: Substantial improvements will be sought in the ability of people to access housing at a price they can afford, through various measures listed in the policy;

2.98 **Policy GM-H 3** Type, Size and Design of New Housing: Development across GM should seek to incorporate a range of dwelling types and sizes to meet local needs and deliver more inclusive neighbourhoods. Where appropriate this should include incorporating specialist housing for older households and vulnerable people. The precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, to reflect local circumstances. In terms of design, all new dwellings must comply with nationally described space standards and be built to the 'accessible and adaptable' standard of Part M4(2) Building Regulations;

2.99 **Policy GM-H 4** Density of New Housing: This policy set out expected minimum density standards for new development, reflecting the location and accessibility of the site by transport and active travel methods. It defines circumstances where lower density may be acceptable, and proposes appropriate density split for houses and apartments in the density standards; and

2.100 For Greater Manchester as a whole a minimum of 179,078 new homes will be delivered over the plan period of 2020-2037, or an annual average of around 10,534 homes. A summary of the housing land supply position for each district was also provided.

2.101 The GMSF Publication Plan Draft for Approval October 2020 also proposed a number of strategic allocations across Greater Manchester for housing and employment land.

Local Context

Corporate Plan 2017 - 2020 (Oldham Council, 2017)

2.102 Oldham's current Corporate Plan expired in December 2020. Work to refresh the plan was due to be completed by Summer 2020, however, the impact of the COVID-19 pandemic meant that this was no longer viable. Instead, the council is in the process of developing our COVID-19 Recovery Strategy which will act as an interim Corporate Plan until at least 2022.

Covid-19 Recovery Strategy (Oldham Council)

2.103 As a Co-operative Council, Oldham is committed to tackling the impact of COVID-19, protecting our most vulnerable residents and communities. The steps we are taking to tackle the pandemic and the subsequent recovery planning, aim to support people, especially those groups who are often most impacted.

2.104 Building on the learning so far and the anticipated events to come, we are developing a comprehensive Recovery Strategy, which will help shape our approach and vision for Oldham over the next eighteen months. We do this whilst we continue to respond to an ongoing critical incident where we are focused each day on saving the lives of Oldham's residents.

2.105 Our objectives and approach to our Recovery Strategy are rooted in the Oldham Model, ensuring as we adapt to a changing world that we build Thriving Communities, an Inclusive Economy and work Co-operatively with each other.

The Oldham Plan 2017 -2022 (Oldham Council, 2017)

2.106 The Oldham Plan is a collective statement of the Oldham Partnership. The Partnership's ambition is for Oldham '*to be a productive and co-operative place with healthy, aspirational and sustainable communities'.*

2.107 Linking to the Corporate Plan, the Partnership identified three fundamental shifts which will work together to deliver this ambition:

- ***An Inclusive Economy*** – for Oldham to become Greater Manchester's Inclusive Economy capital by making significant progress in living standards, wages and skills for everyone through, for example:
  - Supporting the growth of our key employment capabilities seeking and supporting increased innovation and enterprise;
  - Ensuring the spatial rebalancing of the economy to create the best kind of residential, commercial and retail offer for our borough;
- ***Co-operative Services*** – to collaborate, integrate and innovate to improve outcomes for residents and create the most effective and seamless services in GM; and
- ***Thriving Communities*** – for people and communities to have the power to be healthy, happy and able to make positive choices and both offer and access insightful and responsive support when required.

Creating a Better Place (Oldham Council, 2020 - ongoing)

2.108 'Creating a Better Place' incorporates significant programmes of work that have been progressed in order to set out a comprehensive vision and strategic framework for the borough. Creating a Better Place focuses on building more homes for our residents, creating new jobs through town centre regeneration, and ensuring Oldham is a great place to visit with lots of family friendly and accessible places to go.

2.109 This approach has the potential to deliver around 2,500 new homes in the town centre designed for a range of different budgets and needs, 1,000 new jobs and 100 new opportunities for apprenticeships, and is in alignment with Oldham Council's priority as part of Oldham's Green New Deal Strategy to be a smarter, greener and more enterprising place.

2.110 The aim is to provide a diverse housing offer that meets the needs of different sections of the population at different times in their lives. The proposals go beyond numbers alone with a focus on the significant contribution a good housing offer makes to quality of life with access to local services, shops and open green space.

2.111 Creating a Better Place was reviewed in August 2020 to confirm alignment with the borough's economic recovery and to consider the different projects' progression in support of the financial implications associated with COVID-19.

Oldham's Housing Strategy (Oldham Council, 2019)

2.112 The aim of the Housing Strategy and underpinning delivery plan is to provide a diverse housing offer in Oldham, that is attractive and meets the needs of different sections of the population at different stages of their lives. The proposals go beyond the projected numbers of new homes and focus on the dynamics between people, homes and the wider economy.

2.113 In addition to the ambitions of the strategy to build a broader range of housing in the borough, the strategy considers how best the council can support people in a range of housing situations.

2.114 In summary, the Oldham Housing Offer will include:

- Greater diversity in the type of new homes built;
- More choice in affordable homes and financial products;
- Homes attractive to young people;
- Homes suitable for older people;
- Specialised and supported housing for vulnerable people;
- More homes accessible to large and inter-generational families to relieve overcrowding;
- Options to 'Do It Yourself' and support for community-led housing;
- Greater choice for existing tenants;
- Bringing empty homes back into use;
- Improved quality and condition of homes and tenancies for private tenants.

2.115 The Strategy identifies a number of housing challenges facing the borough, in particular:

- Oldham's new LHN (716 new homes per year at the time of writing) is significantly higher than the Local Plan housing requirement of 289 new homes per year, and the HDT places further pressure on housing delivery in the borough;

- Oldham is not considered nationally to be a place of high housing need and so is not currently a priority for funding or assistance from many Government housing funding programmes;

- Oldham's housing sector has been affected by poor performance in the local economy over recent years and income levels are lower than the Greater Manchester average and the National average;

- Ageing housing stock in the borough - Oldham has the highest proportion of pre-1914 terraced housing in Greater Manchester (41%), which is concentrated in the parts of the borough experiencing the greatest levels of deprivation;

- High levels of disrepair within the existing housing stock, particularly in the private housing stock;

- A high proportion of properties in lower council tax bands;

- Lower than average levels of home ownership, compared to Greater Manchester and England;

- Outward migration of younger people from the borough to live elsewhere which is projected to continue;

- High levels of overcrowding, particularly in the terraced housing stock, and limited supply of larger family housing;

- Limited supply of viable housing sites to support the intended scale of housing development;

- The need to increase development on brownfield sites and make brownfield sites more viable;

- Access to rented housing stock is becoming difficult, particularly for new tenants;

- Oldham has an ageing population - by 2035 the number of people aged 75 and above is expected to increase by more than 10,000, as such there is a need for more suitable housing for older people;

- Welfare reform is leading to increasing homelessness and people at risk of homelessness.

2.116 The strategy also sets out a number of opportunities to improve the housing and place offer, such as:

- Oldham's housing is relatively affordable compared to other parts of the North West and nationally. Given the right offer housing affordability could attract economically active young professionals and families, which could help to address the outward migration of these households;

- Building new homes required to meet our LHN provides an opportunity to increase the choices available, enabling people to find a suitable home at a decent price and provide a wider mix of tenure and type to reduce economic segregation and achieve a better mix of incomes;
- Explore new housing development models, such as a Local Housing Company, and alternative financial incentive schemes to support more of Oldham's residents from a wider variety of income groups to access home ownership;
- Selective Licensing and continued efforts to develop constructive working relationships with private landlords had the potential to drive up property and management standards in this sector;
- Developing Housing Action Area Pilots in the most disadvantaged neighbourhoods to held build resilience, community confidence and raise standards in the private rented sector, increasing desirability;
- Working with GM on improving transport networks and helping to bring investment and businesses to the region to strengthen Oldham's place and housing offer; and
- GM devolution and working locally to develop 'Healthy Homes' between housing, health and social care will provide many opportunities for coordinating and joining up services.

2.117 In terms of delivering the Housing Offer, addressing challenges and maximising opportunities, the strategy sets out a number of actions related to housing offer. Firstly, developing partnerships with committed developers and registered housing providers to build homes and places. This includes drawing up a simple MoU with each one to identify support of the ambitions and targets in the strategy and build better opportunities for small and medium sized house builders and developers.

2.118 Secondly, extracting greater co-operative and social value from contracts, including elements such as improvements to the public realm, play facilities and design features to make neighbourhoods more secure and age-friendly.

2.119 Thirdly, improving the viability of difficult sites with developers, in particular difficult brownfield sites to minimise the need for development on greenfield land. This includes a range of actions such as, land price and planning obligations, for example packaging sites, providing greater clarity in obligations and exploring sources of 'gap funding'; foster developer certainty and cash-flow, ensuring developers feel unconstrained to deliver new homes, through supporting sales of completed homes and deferring payment on the sale of council land for housing until sales have taken place; identifying new sources of funding, for example creating a Oldham Housing Fund that can be drawn on to offer developer loans to make sites viability; and improving housing markets in some localities through upgrading the quality of existing homes, environments and management practices.

2.120 In relation to developing the 'place offer', actions set out in the strategy include taking a place-based approach to solving problems and co-producing solutions with residents, for example through establishing a community hub to take forward community based programmes and bringing together place-based teams and private sector housing work.

2.121 Secondly, co-designing future-facing 'Place Plans' and masterplans with local communities. This would involve working with residents to draw up plans for their local areas as part of the Local Plan or neighbourhood planning. Place Plans would respond to the evidence of need, draw on strengths of the area's and make the most of opportunities to meet future housing, employment and public realm needs over the long term, supporting a vision for the life of the community. They could include a wide range of considerations that will determine what sort of place that neighbourhood becomes, including design of development, community spaces and local services. Masterplans could be developed by the council or developers in liaison with the council and local residents to help bring difficult sites forward.

2.122 Thirdly, producing evidence-based 'Housing Insights' to create more balanced thriving communities. The Housing Insights will be based on the Place Plans and will set out the evidence behind what might work best in terms the mix of new homes and other interventions/ investment that is expected to achieve the overall vision for that place, as articulated in the Place Plan. They provide the opportunity to present the evidence and proposals around housing to communities at an early stage and for this to be part of the place-planning/ masterplanning process. They will also inform the Local Plan and discussions with developers. Each Housing Insight will:

- Set out the current and future target mix of type, size, tenure, affordability and density of new homes relative to local incomes for that part of the borough, and therefore the number of new homes of each that are required to achieve the desired balance of homes over a particular period;
- Specify any particular council interventions and investment that may be focused on the area, including for example, Selective Licensing, empty homes programmes and private rented sector improvements; and
- Set out what financial products might be available to help first time buyers to secure a home in that area.

2.123 The Strategy also makes reference to the major development sites identified within the GMSF (now Places for Everyone). It states that the Housing Insights evidence base and Local Plan will provide a steer on requirements for major development sites in order to support their comprehensive, sustainable development and integration into surrounding neighbourhoods.

Oldham Town Centre Masterplan Vision (Oldham Council, 2019)

2.124 Oldham Town Centre has an important role to play in the delivery of our future housing growth and addressing our local needs. Through a series of building blocks and priority areas, the council's vision is that Oldham Town Centre will become a place that thrives, where our ambition for housing can be a catalyst for change.

2.125 Through delivering this vision it is the council's ambition to have quality town centre homes that:

- Increase the population living in the town centre;
- Increase footfall in the town centre;
- Increase the number of young people staying in the borough;
- Give a wider choice of residential options for all;
- Support an increase in the town centre leisure offer; and
- Decrease anti-social behaviour.

Draft Local Wealth Building Blueprint (Oldham Council, 2020)

2.126 A draft Local Wealth Building Blueprint is in production. Community wealth building aims to harness the spend, assets and wealth of the council and other key ‘anchor’ institutions within the borough to bring benefits to both the local economy and directly to residents. The vision of this Blueprint is to “harness the spend, assets and wealth of the council and other key ‘anchor’ institutions within the borough to bring benefits to the local economy and directly to residents”. It is supported by four pillars:

1. Progressive social value procurement - maximising social value and everything we spend to benefit local communities and residents.
2. Workforce and fair employment - ensure our workforce is representative of the communities we serve.
3. Land, assets and property for social good - increase how we make the best use of land and property for public good.
4. Growing a social economy - create the conditions for more locally owned and socially minded enterprises to take hold and thrive in Oldham.

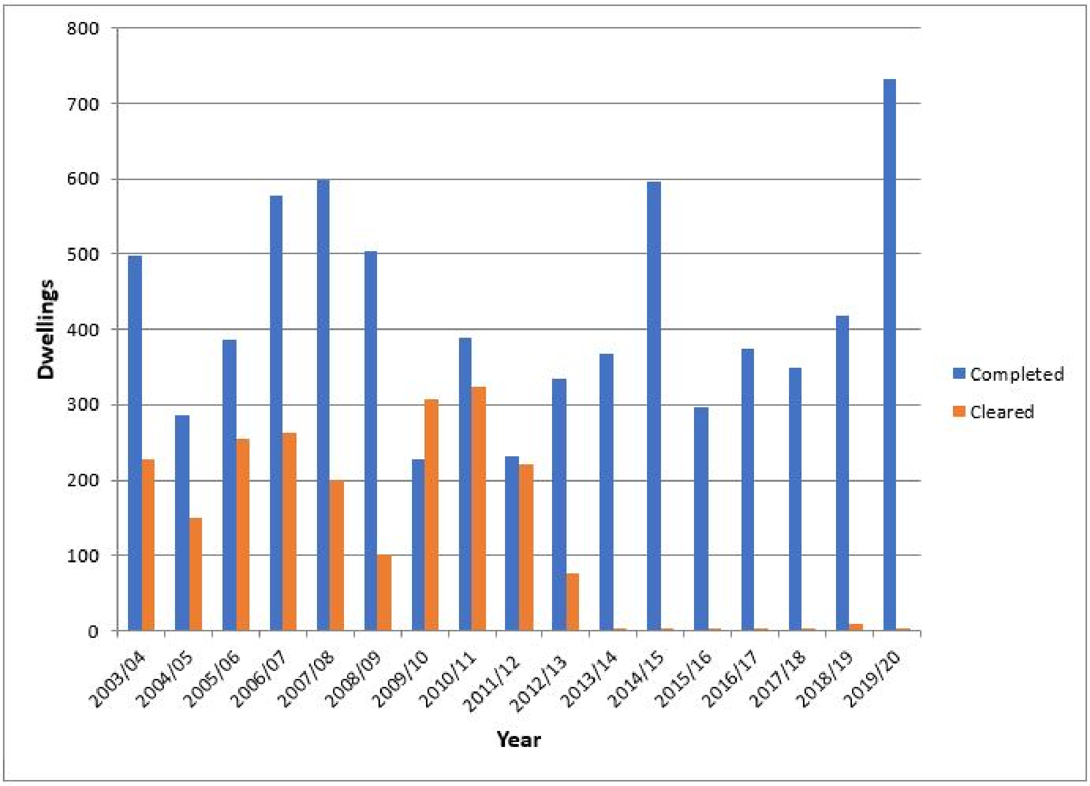
2.127 The Local Plan will have a key role to play in this piece of work as it progresses in all of the pillars, particularly in relation to Pillar 3 and making the best use of land and property.

3 Evidence Base

Housing Completions

3.1 This section looks at housing completions over the last 10 years, from 2010/11 to 2019/20.

3.2 **Figure 1: Housing Completions and Clearance 2003/04 to 2019/20**

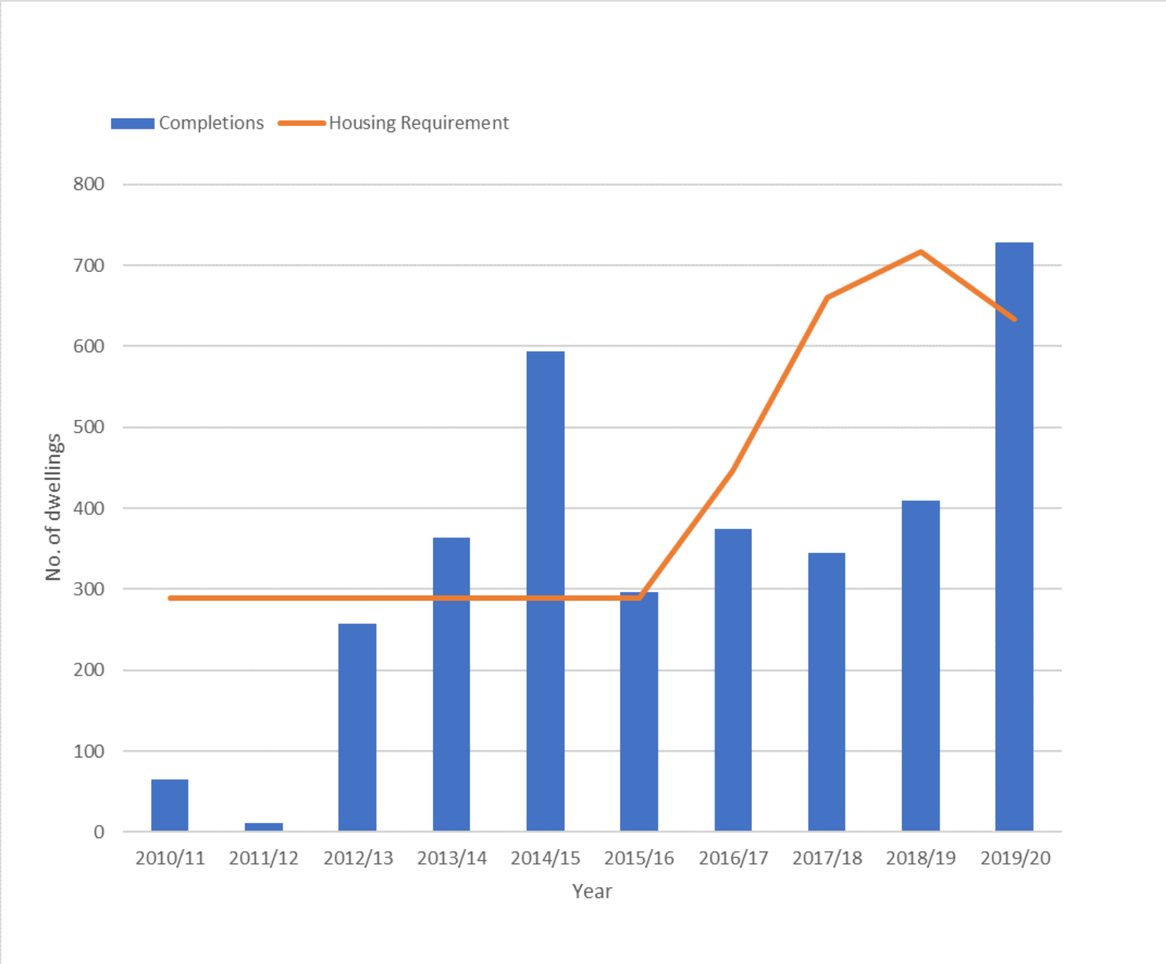


Housing Completions and Clearance 2003/04 to 2019/20

3.3 The completions in figure 1 show that there has been a net gain of 3,443 new homes over the last 10 years, equating to an average of 344 new homes a year. As illustrated by figure 2, this is 747 homes less than the housing requirement[(1)] for the same period (4,190 homes). Out of those 10 years, the number of net completions has exceeded the housing requirement (for the given year) four times. Three years of which was when the lower housing requirement of 289 new homes per year applied.

1 The requirement is based on that identified in Oldham's Joint Core Strategy and Development Management Development Plan Document (the Local Plan) for the period 2008/09 to 2014/15 and then the requirement identified through the Housing Delivery Test measurement for the period 2015/16 to 2019/20.

Figure 2: Housing Completions against Requirement



3.4 The number of net completions has fluctuated over the last ten years, as shown in figure 2. After falling in 2015/16, completions increased again from 2016/17 as a number of larger sites began construction. There have also been high levels of clearance that took place as a result of regeneration activity during 2003/04 to 2012/13, along with the changing economic conditions witnessed since 2008/09 that may have had an effect. However, over the last seven years, completions have improved, with an average of 421 dwellings being completed annually.

3.5 Completions in 2019/20 were significantly higher than the annual average, with 728 homes being completed. This is due to a number of reasons, including several large sites completing in full and improved monitoring of housing completions due to increased reliance on council tax records.

3.6 The impact of clearance on net completions since 2010/11 is illustrated in table two, which shows the number of net completions over the past 10 years compared to the relevant housing requirement. From 2010/11 to 2018/19 the housing requirement was an annual average of at least 289 dwellings. For 2018/19 and 2019/20 the net completions for these years is compared to the housing requirement of 692 homes per year, based on MHCLGs former standard methodology. Oldham's housing requirement has recently changed to 683 based on the publication of the latest affordability ratios by ONS in March 2021.

Table 2 Housing completions compared to clearance 2010/11 to 2019/20

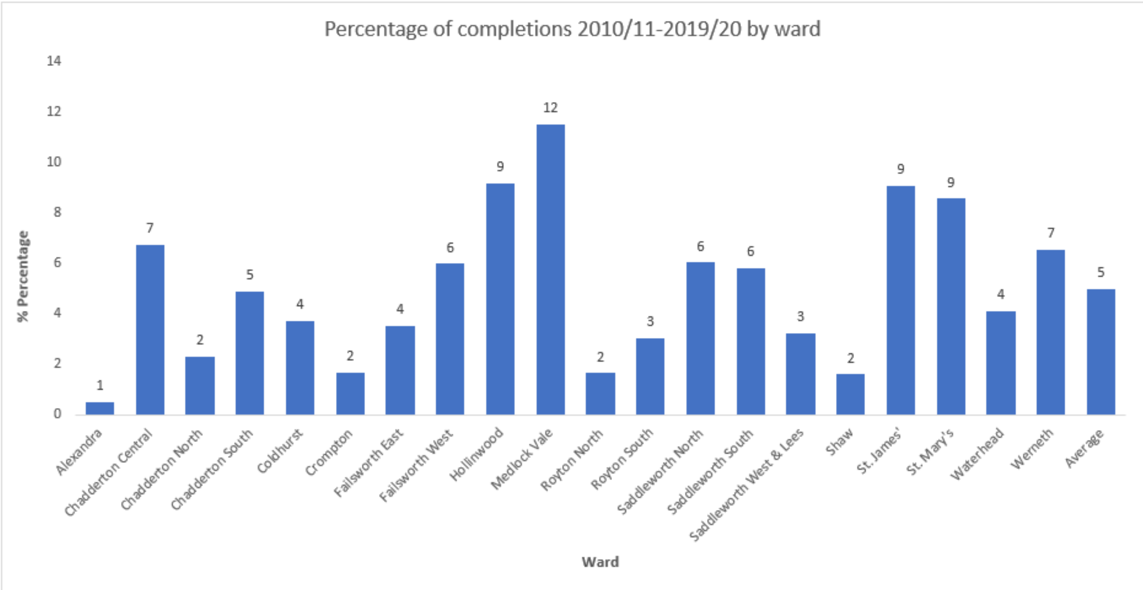
Year	Completed (gross)	Cleared	Change	Variance against housing requirement
2010/11	389	324	65	-224
2011/12	231	220	11	-278
2012/13	334	77	257	-32
2013/14	367	4	363	74
2014/15	596	2	594	305
2015/16	297	1	296	7
2016/17	375	1	374	85
2017/18	348	1	345	56
2018/19	419	9	410	-282
2019/20	732	4	728	36
Total	4,088	643	3,443	-253

3.7 Table two shows that from 2010/11 to 2011/12 clearance was very close to gross completion levels. As explained above, high levels of clearance during this time was due to regeneration activity occurring across the borough.

Location of Completions

3.8 Figure 3 shows the spatial distribution of housing completions from 2010/11 to 2019/20 across Oldham by ward.

Figure 3: Percentage of housing completions by ward 2010-2020



3.9 As illustrated in figure three, over the last ten years the greatest proportion of gross completions has been in Medlock Vale with 12%, followed by Hollinwood, St James' and St Mary's with 9%, then Chadderton Central and Werneth with 7%. The wards with the lowest proportion of gross completions has been Alexandra with 1%, followed by Chadderton North, Crompton, Royton North and Shaw with 2%.

Housing Land Supply

Strategic Housing Land Availability Assessment (SHLAA)

3.10 NPPF requires local authorities to provide a robust evidence base that identifies suitable housing land in the form of a Strategic Housing Land Availability Assessment (SHLAA). The SHLAA forms a key component of the Local Plan evidence base to support the delivery of sufficient land for housing to meet housing targets.

3.11 Oldham's SHLAA as at 1 April 2020 provides the most up to date information on housing land supply across the borough. The SHLAA is a technical document identifying land that might have potential for housing at some stage in the future, as required by NPPF [2].

3.12 The SHLAA forms a key component of the evidence base required to inform preparation of the Local Plan and will underpin housing policies and land allocations. It also informs preparation of Oldham's Brownfield Land Register. The SHLAA identifies the development potential of land capable of delivering dwellings and indicates when it may come forward for development. The land included in the SHLAA forms the baseline housing land supply. It does not include the strategic allocations which are being considered as part of Places for Everyone.

2 Paragraphs 67, 73-75

3.13 The SHLAA report contains the methodology used to identify and assess sites, the findings from the assessment and the council's position in relation to meeting it's housing land requirement. This part of the topic paper only considers the key findings of the SHLAA.

3.14 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);
- Sites with extant full or outline residential planning permission as at 01/04/2020;
- 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 where there has been no development activity for at least 5 years); and
- 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).

3.15 The SHLAA provides the five year land supply position covering the period between 1 April 2020 and 31 March 2025, and also identifies the potential supply for the medium (years 6-10) and longer term (11 years plus). Table three provides a summary of the Housing Land Supply as at 1 April 2020, showing the number of dwellings in each category and places them in five-year periods, up to 2030 and beyond.

Table 3 Breakdown of the housing land supply as at 1 April 2020

SHLAA category	Total dwellings 2020-2025	Total dwellings 2025-2030	Total dwellings Years 11+	Total dwellings - all periods	% of supply (dwellings)	Total of number of sites	% of supply (sites)
Sites under construction	1,085	0	0	1,085	10	135	29
Sites with extant planning permission	545	500	0	1,045	10		36
Saved UDP Phase 1 housing allocations	24	316	34	374	3	9	2
Saved UDP Phase 2 housing allocations	52	253	0	305	3	6	1
Lapsed and Stalled sites >5 dwellings	0	530	399	929	9	40	9
Potential sites	560	3,177	3,231	6,968	65	104	23
SUBTOTAL	*2,266*	*4,776*	*3,664*	*10,706*	100	462	100
Current small sites allowance minus any small sites already identified in supply	0	325	455	780			
Current clearance allowance	163	25	35	223			
TOTAL	**2,103**	**5,076**	**4,084**	**11,263**			

3.16 The SHLAA (as at 1 April 2020) identifies a baseline housing land supply of 10,706 homes. This increases to 11,263 homes when taking into account the small sites and clearance allowances.

3.17 Table three shows that 65% of the existing housing land supply is on potential housing sites. This means that 35% of the supply is on sites within the planning system. This includes those that are under-construction, have planning permission (outline and full), existing housing allocations, and where planning permission has lapsed or development has stalled. A small proportion of the potential housing sites are anticipated to come forward as part of the five-year housing land supply, however the majority of this category and lapsed or stalled sites are anticipated to be delivered from 2025 onwards.

Windfall allowance

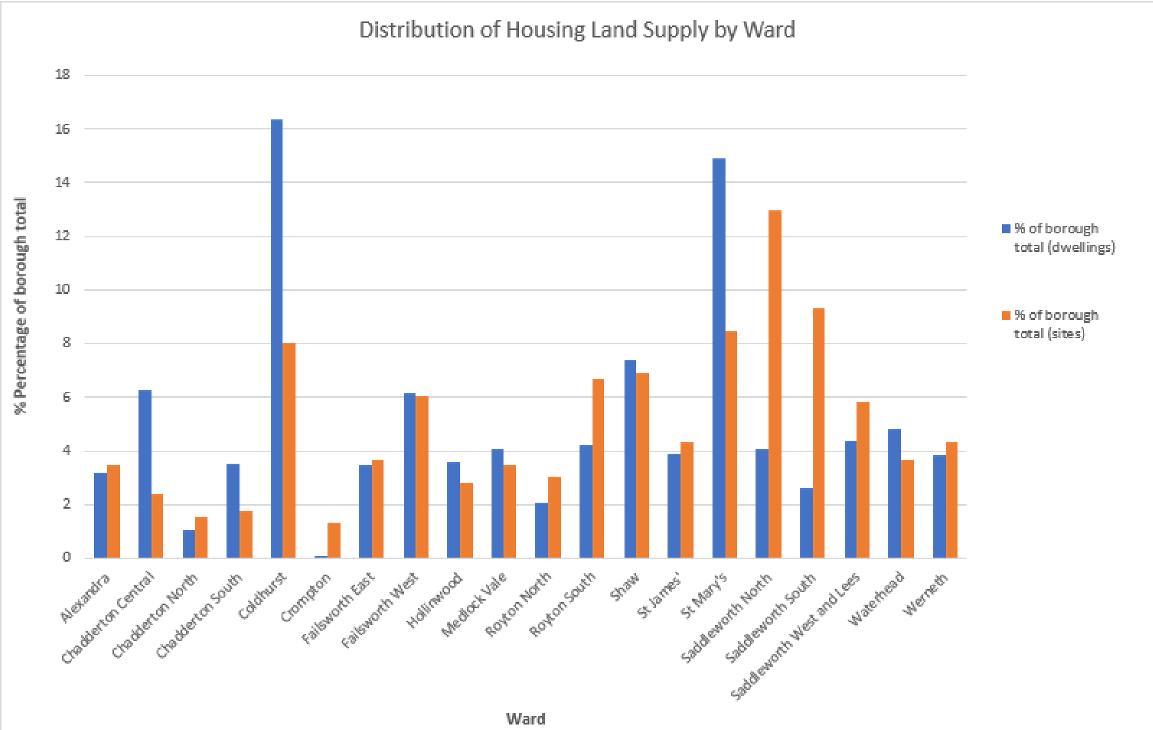
3.18 The SHLAA sets out the approach to windfall allowance, which is that due to the limited evidence available, it is not considered appropriate to have a windfall allowance until there is more evidence available. It is accepted that windfall sites will continue to supply a relatively significant proportion of the housing land supply, 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.

Small sites allowance

3.19 In terms of small sites, the SHLAA sets out 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 the potential for residential development for inclusion in the SHLAA. The allowance rate is based on analysis of housing completions on small sites over a five year period from 1 April 2015 to 31 March 2020. This shows that 326 homes have been completed on small sites in this period (around 15% of all completions over this time), equating to an average of 65 homes per annum.

Spatial Distribution of Housing Land Supply

Figure 4: Distribution of the housing land supply by ward



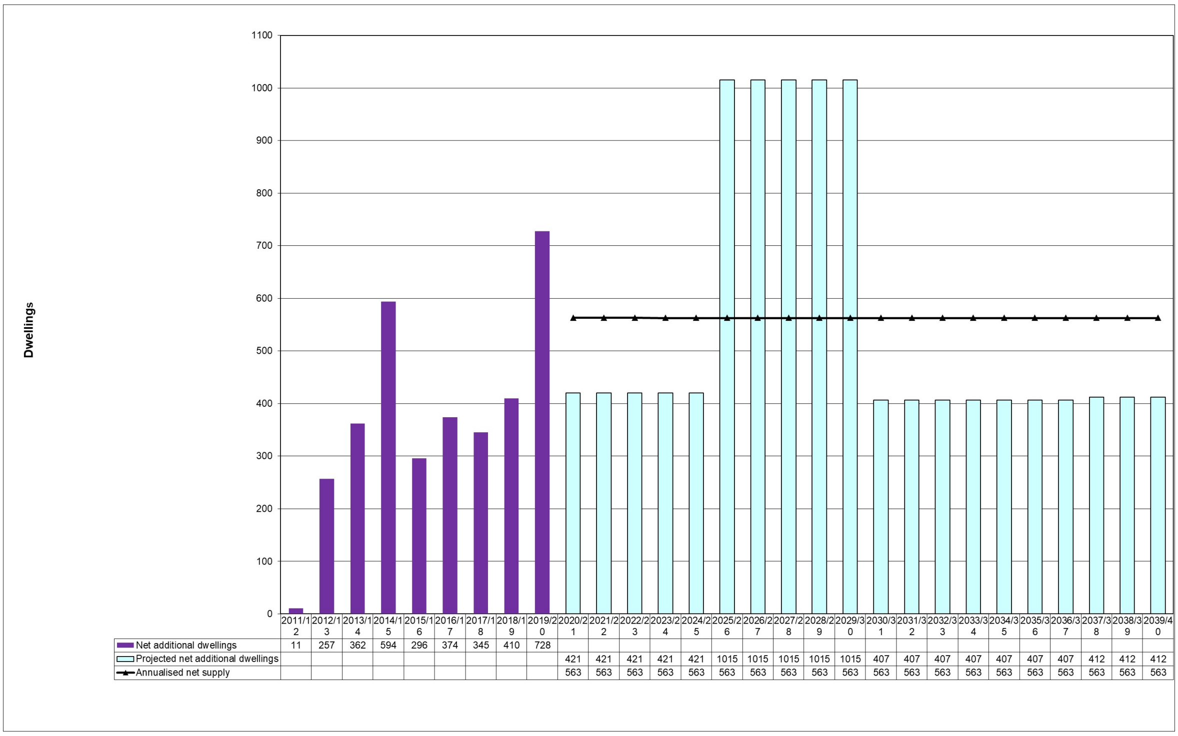
3.20 Figure 4 shows that a significant proportion (21%) of the dwellings identified within the baseline housing land supply fall within St Mary's (15%) and Coldhurst (16%) wards, which include Oldham Town Centre. The majority of this is due to the amount of potential residential development identified in Oldham Town Centre (see below). The next highest are Chadderton Central (6%), Failsworth West (6%) and Shaw (7%). The wards with the lowest proportion of the dwellings identified within the baseline housing land supply are Crompton (0.1%), Chadderton North (1%) and Royton North (2%). The three Saddleworth wards account for 11% of the dwellings identified within the baseline housing land supply.

3.21 The baseline housing land supply (including 308 homes identified in the post-plan period) includes 2,671 new homes in Oldham Town Centre. 89% of these are potential sites, 5% have planning permission (including outline and prior approval) or are under-construction, and 6% are lapsed or stalled sites . All the potential sites identified in Oldham Town Centre are not anticipated to come forward until after the first five years, indeed 60% are identified in the 11+ years category.

Housing Trajectory

3.22 The housing trajectory below (figure 5) takes account of all sites identified in the housing land supply set out in the SHLAA for years 0 to 5 and beyond. It shows the net additional new homes that are expected to be delivered over this time period. It takes account of projected clearance and the small sites allowance.

Figure 5: Housing Trajectory



3.23 The trajectory illustrates that there is expected to be an increase in the annual average completion rate over the next five years (2020/21 to 2024/25) with 2,103 net completions over this period (taking account of expected clearance). This equates to an annual average of 421 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.

3.24 The trajectory indicates that a further 9,160 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.

Five-year Supply

3.25 The SHLAA sets out the five-year housing land supply position, as set out in table three above. This indicates that 2,266 dwellings (before projected clearance) are expected to be delivered over the next five years from 1 April 2020 to 31 March 2025. When considered against the current Local Housing Need of 683 new homes per annum, this equates to a 3 year supply of identified housing land. Therefore, whilst the SHLAA demonstrates that there is a considerable amount of potential housing land currently available, there will be a need to identify further land if future housing targets are to be met.

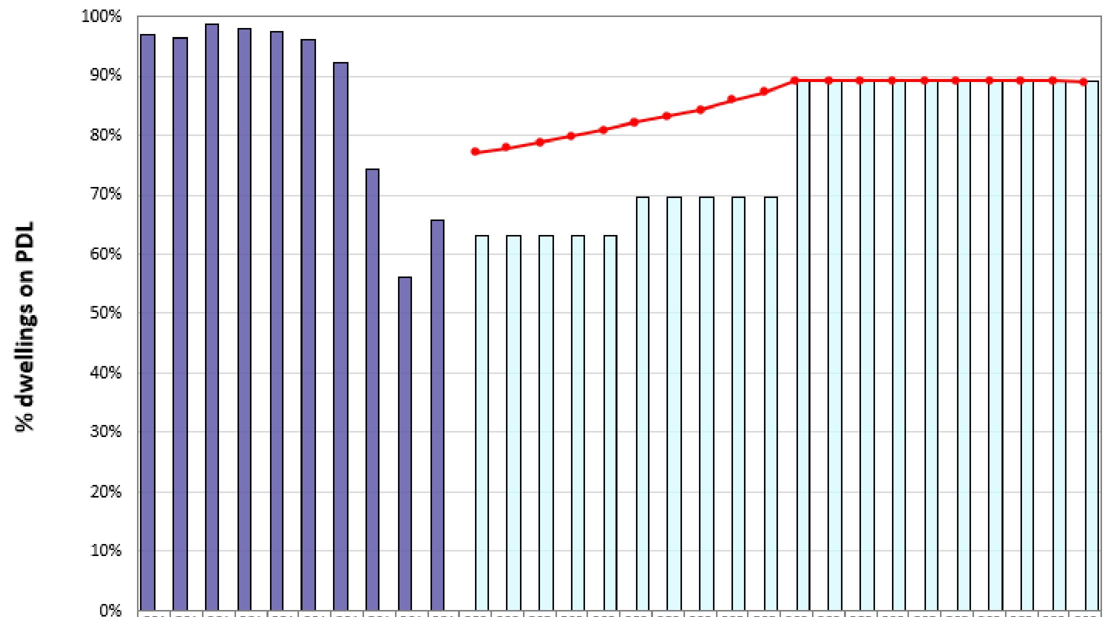
Previously Developed Land

3.26 The previously developed land (PDL) trajectory (figure 6) shows that:

- 87% of all completions for new residential development during 2010/11 to 2019/20 were on previously developed land;

- Projections for the next five-years (2020/21 to 2024/25) are based upon sites within the five-year housing land supply. The trajectory shows that 63% of the five-year housing land supply is on PDL; and
- Overall, an average of 74% of all new homes identified as part of the borough's potential housing land supply (i.e. post five-year supply) are on PDL.

Figure 6: Previously Developed Land Trajectory



	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Actual % PDL	97%	97%	99%	98%	98%	96%	92%	74%	56%	66%					
Projected % PDL											63%	63%	63%	63%	63%
Average % PDL											77%	78%	79%	80%	81%

	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	3039/40
Actual % PDL															
Projected % PDL	70%	70%	70%	70%	70%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%
Average % PDL	82%	83%	84%	86%	87%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%

3.27 It is important to note that the PDL projections relating to the housing land supply do not include dwellings delivered in sites that are a mixture of greenfield and brownfield land within the site. The five-year housing land supply includes a further 367 dwellings on mixed sites (16% of the five-year supply). The post five-year housing land supply includes 1,043 dwellings on mixed sites (12% of the post five-year supply).

3.28 In total 79% of the five-year housing land supply and 86% of the post five-year housing land supply is made up of previously developed land or mixed sites.

Oldham's Brownfield Land Register

3.29 As required by the Town and Country Planning (Brownfield Land Register) Regulations (2017), Oldham maintains a Brownfield Land Register[3]. The first Brownfield Land Register was published in December 2017 and is updated annually as required, most recently in December 2020.

3.30 The selection of sites to include in the register has been informed by ongoing housing land monitoring and is a sub-set of the sites identified in the Strategic Housing Land Availability Assessment (SHLAA), as at 1 April 2020.

3 Oldham Council's Brownfield Land Register (2020), available at: https://www.oldham.gov.uk/info/200585/local_plan/2043/brownfield_land_register

3.31 As the sites to be included are only those that are considered to meet the criteria set out in Regulation 4, the council has decided to identify the following categories of brownfield land for the register:

- Sites that (as of 1st April 2020) have, or have previously had, planning permission for residential development for at least five dwellings[4];
- Other sites without residential planning permission which have been identified as “suitable”, “available” and “achievable” in the SHLAA, as at 1 April 2020.

3.32 For each site on the register, the minimum net number of dwellings that the site should support needs to be identified. For sites with a current or previous planning permission, this has been given as the number of homes approved as part of that permission. On sites without planning permission, the number stated is that published in the SHLAA. The capacity will be reviewed following the findings of any review of the SHLAA and any changes in density assumptions.

3.33 For the 2020 update, the register contains 159 sites which meet the criteria as set out within Regulation 4. However, it should be noted that some of these sites, such as those which have been built out, are no longer available brownfield land. As per updated guidance[5]these sites remain on the register as evidence. Where this is the case, an end date has been included to show that the site is no longer available.

3.34 At present the council has not included any sites within 'Part 2' of the Register. This position will be reviewed as necessary.

Housing Requirement

Local Housing Need Standard Methodology

3.35 A key principle of plan-making is to determine and plan for the housing needs of the area. As stated, Oldham is working together with the other nine districts in Greater Manchester to prepare Places for Everyone, which once adopted will form a key part of Oldham's Local Plan. Places for Everyone will identify how much housing land is needed and each district's housing target will be set out in the plan.

3.36 Paragraph 60 of the NPPF states that:

3.37 *'To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.'*

3.38 Following consultation [6], MHCLG introduced an updated standard methodology for calculating local housing need in December 2020. The updated standard methodology is based on the overarching principles of ensuring that the new standard method delivers a number nationally that is consistent with the government's commitment to

4 This does not include sites that are actively under construction or where construction has commenced but stalled as, following advice from a 2017 DCLG response to Wigan Council, there are not considered "suitable, available and achievable" for the purposes of the register

5 As set out within the "Publish your Brownfield Land Data" Guidance, available at: https://www.gov.uk/government/publications/brownfield-land-registers-data-standard/publish-your-brownfield-land-data

6 'Changes to the current planning system', available at: [Government response to the local housing need proposals in “Changes to the current planning system” - GOV.UK (www.gov.uk)]

plan for the delivery of 300,000 new homes a year, a focus on achieving a more appropriate distribution of homes, and on targeting more homes into areas where there are affordability challenges.

3.39 Essentially, the updated methodology remains the same, except for a final step added whereby a 35 percent uplift to the post-cap number is added to Greater London and the other 19 most populated cities and urban centres in England (according to ONS). This includes one Greater Manchester borough - Manchester - who is part of the nine authorities producing Places for Everyone.

3.40 In particular, it is specified that:

- The 2014-based household projections will continue to be used. The government has concluded that due to the substantial change in the distribution of housing need that would arise as a result, in the interests of stability for local planning and for local communities, it will continue to expect only the use of the 2014-based projections;
- The government wants to ensure that work continues to progress Local Plans through to adoption as soon as possible and, at a minimum, by the end of 2023 to help ensure that the economy can rebound from COVID-19;
- The most recent affordability ratios should continue to be used ensuring relevant market signals continue to play a role; and
- The government will retain the provision that caps increases in local housing need in each planning cycle at 40%, except for in areas where the cities uplift is applied.

Population projections[7]

3.41 Oldham's population has been steadily growing since the start of this century. The increase is in roughly equal measure, to (a) natural change (births are higher than deaths), and (b) international migration into Oldham being higher than out of Oldham.

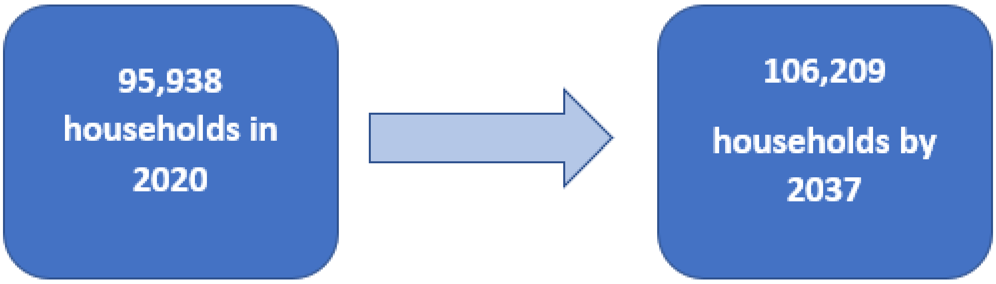
3.42 ONS estimated Oldham's 2020 mid-year population at 238,525, increasing to 256,537 by 2037, a difference of 18,012 over the plan period.

3.43 The council's own estimates for 2020 are slightly higher than the official ONS Mid-Year estimates at 244,930 (an increase of 6,405). The difference is mainly due to estimates of migration into Oldham, especially for the period around 2015-2017.

7 Population and Migration Report, Oldham Council 2020

Household projections

Figure 7: Household Projections 2020 to 2037



3.44 As shown in figure 7 the ONS 2020 household projection is 95,938 homes, increasing to 106,209 by 2037, an increase of 10,271 households (+9.6%). The LHNA used a base date of 2018 and used council tax data on registered households (92,821 households), compared to ONS household projections. Council tax projections are slightly lower than ONS projections.

3.45 The current standard methodology for assessing local housing need includes four steps:

Step 1: Setting a baseline;

Step 2: An adjustment to take account of affordability; and

Step 3: Capping the level of any increase as appropriate.

Step 4: Cities and urban centres uplift

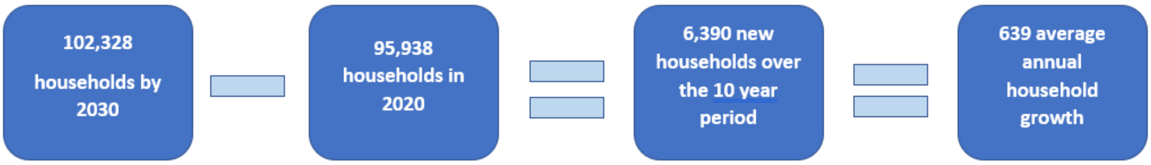
3.46 The methodology is explained further below.

Step 1 - Setting the baseline

3.47 The baseline is set using the national household growth projections[8] for the area of the local authority. Household projections are trend-based and indicate the number of additional households that would form if recent demographic trends continue. The government has specified with the publication of the updated standard methodology that the 2014-based household projections will continue to be used, over the 2016 or 2018 household projections. Starting from the current year, the projected average annual household growth over a ten year consecutive period must be calculated, as illustrated by figure 8.

8 2014-based Household Projections in England, table 406 unitary authorities and districts in England: https://www.gov.uk/government/statistics/2014-based-household-projections-in-england-2014-to-2039

Figure 8: Local Housing Need Step 1 -Setting the baseline



Step 2 - An adjustment to take account of affordability

3.48 The baseline projected household growth, calculated in step 1, is then adjusted based on the affordability of the area. This uses the most recent median workplace-based affordability ratios, published by the ONS. These were most recently published in March 2021.

3.49 No adjustment is applied where the ratio is 4 or below. For each 1% the ratio is above 4, the average household growth baseline should be increased by a quarter of a percent. An authority with a ratio of 8 will have a 25% increase on its annual average household growth baseline.

3.50 Where an adjustment is to be made, the precise formula is as follows (figure 9):

Figure 9: Local Housing Need - Affordability Adjustment Formula

$$Adjustment\ factor = \left(\frac{Local\ affordability\ ratio\ - 4}{4}\right) x\ 0.25 + 1$$

3.51 Oldham's workplace based affordability ratio is 5.11 (2021). Following the formula above the adjustment factor is 1.069 and is used as shown in figures 10 and 11:

Figure 10: Local Housing Need Step 2

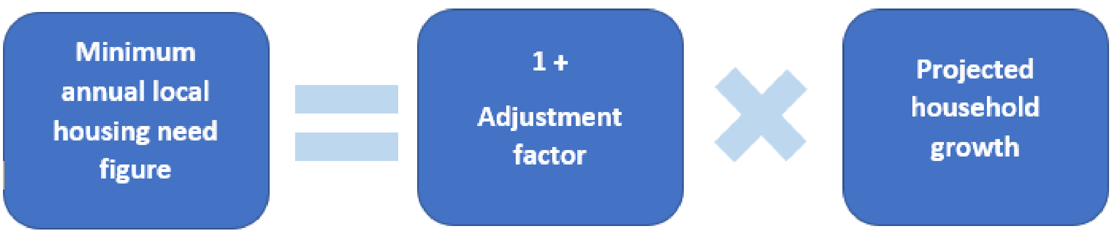


Figure 11: Local Housing Need Step 2

Step 3 - Capping the level of any increase

3.52 The next step involves applying a cap which limits the increase in the minimum annual housing need figure an individual local authority can face. How this is calculated depends on the current status of relevant strategic policies for housing.

3.53 Where the relevant strategic policies for housing were adopted more than 5 years ago, (at the point of making the calculation) as in the case of Oldham, the local housing need figure is capped at 40% above whichever is the higher of:

a. the projected household growth for the area over the 10 year period identified in step 1; or
b. the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).

3.54 Oldham does not currently have an adopted annual housing requirement figure, and as the LHN figure is less than 40% above the figure identified in step 1, no cap is applicable in this case. Step four 'cities and urban centres uplift' is also not applicable to Oldham.

3.55 As such, Oldham's current local housing need is 683 new homes per year, as shown in figure 11. This has taken effect from March 2021, when the most recent affordability ratios were published, updating the previous figure of 693[9].

Housing Delivery

Housing Delivery Test

3.56 The Housing Delivery Test (HDT) has been introduced by the Government as a monitoring tool to demonstrate whether local areas are building enough homes to meet their housing need. The HDT measures net additional dwellings provided over the past three years against the homes required over the same period. Results on performance for each Local Planning Authority in England are published annually.

3.57 The consequences of failing the Test are set out in NPPF.

3.58 Oldham's Local Plan was adopted more than five years ago. In accordance with Housing Delivery Test Rule Book[10]the district's HDT result is therefore calculated using homes delivered in the previous three years and the housing requirement (for those years).

9 Between the publication of the amended standard methodology in December 2020 and the publication of the most recent affordability ratios in March 2021, Oldham's local housing need as per the standard methodology was 693 homes per year as was set out in the most recent SHLAA (as of 1 April 2020) and Monitoring Report (2019/20)

10 https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book

The latest set of HDT results were published 19 January 2021[11], using the previous three complete financial years of 2017/18, 2018/19 and 2019/20. The results for Oldham are shown in table four below.

Table 4 Oldham's Housing Delivery Test Results (as published January 2021)

	Total number of homes required (2017-2020)*	Total number of homes delivered (2017-2020)	Housing Delivery Test: 2018 measurement	Housing Delivery Test 2018 consequence
Oldham	2,010*	1,610	80%	Action Plan and 20% Buffer
*2017/18 number of homes required = 660 + 2018/19 number of homes required = 717 + 2019/20 number of homes required = 633 **= 2,010 homes required 2017-2020**				

3.59 As set out above, Oldham Council has delivered 80% against the HDT requirement. As a consequence, there is a need to:

- Produce an Action Plan identifying and analysing causes of under-delivery and setting out actions to address them; and
- Identify a 20% buffer of deliverable housing land in addition to the existing sites identified in the five-year housing land supply.

3.60 Based on the identified five-year housing land supply and local housing need over the next five years, Oldham is unable to identify a five-year supply of housing land. Consequently, the 'presumption in favour of sustainable development' as set out in paragraph 11 of the NPPF, would still apply. This is based on the latest housing land supply position set out in the SHLAA as at 1 April 2020.

3.61 An Action Plan is intended to be a practical document, focused on effective measures aimed at improving delivery within an area underpinned by local evidence and research of key issues. The Action Plan will be a live document, reviewed and updated as appropriate.

Oldham's Housing Delivery Test Action Plan (Draft, 2021)

3.62 Oldham Council published its first Action Plan in 2019 in response to the first HDT result. At the time of writing the the second Action Plan is being finalised and due to be published in July 2021.

3.63 The draft 2021 Action Plan complements a number of existing council plans, policies and strategies which together provide a framework for the delivery of the council's housing priorities.

3.64 The draft plan contains housing delivery supply and analysis; a summary of findings and key issues from stakeholder consultation; key actions and responses; and project management and monitoring arrangements.

3.65 The key findings from the analysis of housing delivery and the make-up of the housing land supply carried out for the draft 2021 Action Plan, has identified a number of issues which together contribute towards under-delivery within the borough. In summary these are:

11 https://www.gov.uk/government/publications/housing-delivery-test-2020-measurement

- The increase in Oldham's housing requirement to 683 new homes per year, which is a significant increase on the requirement set out in the Local Plan (289 new homes per year). This will require a step change in housing delivery and supply;
- There is a need to ensure that brownfield sites come forward for development - 75% of the housing land supply is on brownfield land, with a significant proportion (70% of the supply) on sites of between 50 to 199 dwellings and 200+ dwellings, offering opportunities to broaden the breadth of development opportunities across the borough;
- Scale of development coming forward - minor sites (of less than 10 dwellings) make up 84% of sites granted planning permission in the last ten years. Whilst the number of major sites coming forward is relatively low they continue to form a significant proportion of the supply, accounting for 78% of dwellings granted permission over the last ten years. 'Major' sites in Oldham are still relatively small with the majority having a capacity of under 50 dwellings. However the most recent update of the housing land supply (as at 1 April 2020) has identified additional 'large-scale major' sites (over 200 dwellings);
- We need to continue to increase the number of major sites coming forward and support them in delivery where appropriate, in particular those with a capacity of 100 to 200+ dwellings, especially as these are more attractive for housebuilders and which, as the analysis has shown, appear to be developed faster;
- Build-out rates - larger schemes are being commenced faster than smaller ones. Yet, as outlined above, the number of major sites coming forward is relatively small;
- Delivery of minor sites - evidence indicates that there is less of a market for minor sites and , where there is, there is less impetus for the site to come forward quickly. There is a need to look at how we improve the delivery of smaller sites, particularly as they make such a large contribution to our housing land supply;
- Over-reliance on sites outside the planning system - with 65% of the housing land supply (as at 1 April 2020) made up of potential housing sites that do not currently have any planning status; and
- Issues around the implementation of planning permissions which may, for example, be due to viability and delivery.

3.66 A number of actions have been progressed since the publication of the first action plan in August 2019, including:

- A developer questionnaire was sent out to update the evidence gathered as part of the previous developer forum, to inform the most recent Action Plan;
- A review of the planning scheme of delegation has been carried out, to ensure more effective and efficient decision making and engagement with members. An updated scheme of delegation has been approved at full Council in February 2020;
- A pre-application service has been set up to ensure more effective and consistent communication between prospective developers and council departments, and efficient progress of applications. Also introduced with this service is the use of Planning Performance Agreements (PPAs), in order to improve the efficiency of the application process of larger scale and complex developments. The service has been in place since December 2019;
- Priority sites have been identified to help support the delivery of brownfield land across the borough. Further work will be carried out on these sites as set out in

the Action Plan. The sites are set out within the Housing Delivery Action Plan - Part 2

3.67 The draft 2021 Action Plan provides a full update of progress on the housing delivery actions and will be available online when published.

Housing Market Context

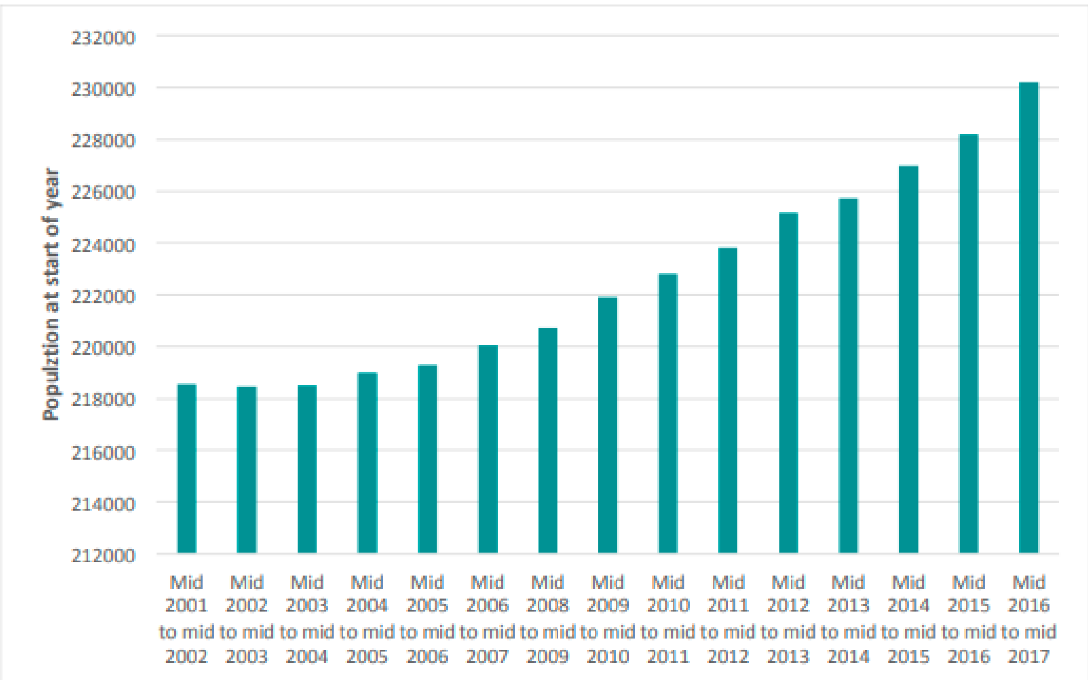
3.68 The Oldham Local Housing Needs Assessment (LHNA) 2019 provides the latest available evidence to help to shape the future planning and housing policies for the area. The LHNA provides local evidence which builds upon the Greater Manchester Strategic Housing Market Assessment (GM SHMA). The assessment considers the affordable housing needs of households, the aspirations and expectations of those households moving in the market, and the need for particular types of dwelling by virtue of age or disability. The research contained within the assessment provides an up-to-date analysis of the social, economic, housing and demographic situation across the borough. The full assessment is available at: Local Housing Needs Assessment 2019

3.69 This section of the topic paper summarises the general housing market context. It is followed by a section on the needs of specific groups, again utilising the findings on the LHNA.

Demographics

3.70 Figure 12 shows how the population has changed since since 2001 using official ONS population data. Over this period, the population has increased 5.3% or by around 11,660.

Figure 12: Population change in Oldham 2001 to 2017

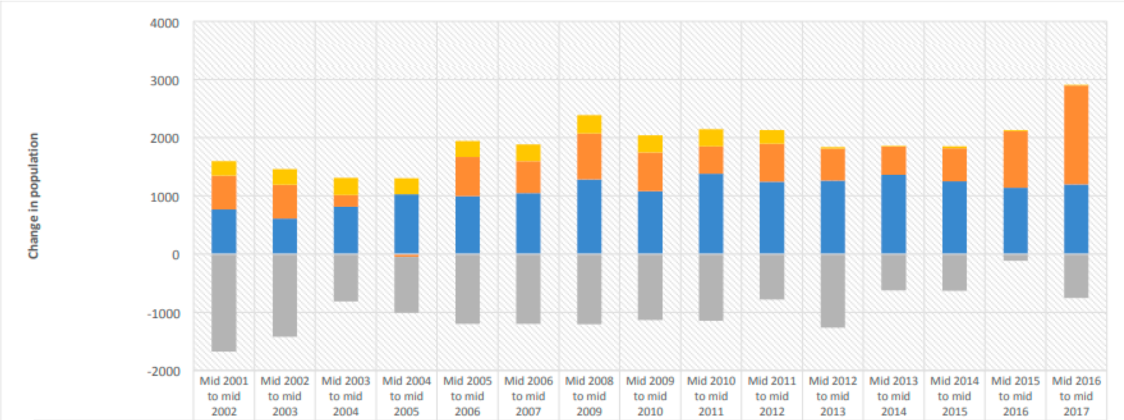


Source: ONS Mid-year estimates

(12)

3.71 Figure 13 also shows the relative influence of natural change, net internal migration and net international migration on annual population change during their period. The figure shows that the influence of natural change has been relatively stable throughout the period. The role of international migration has resulted in net population growth each year since 2011 and has become a particular driver in recent years.

Figure 13: Components of population change in Oldham 2001 to 2017



	Mid 2001 to mid 2002	Mid 2002 to mid 2003	Mid 2003 to mid 2004	Mid 2004 to mid 2005	Mid 2005 to mid 2006	Mid 2006 to mid 2007	Mid 2008 to mid 2009	Mid 2009 to mid 2010	Mid 2010 to mid 2011	Mid 2011 to mid 2012	Mid 2012 to mid 2013	Mid 2013 to mid 2014	Mid 2014 to mid 2015	Mid 2015 to mid 2016	Mid 2016 to mid 2017
Other	243	269	297	279	276	288	310	294	292	233	25	13	29	20	14
Internal net migration	-1676	-1423	-814	-954	-1201	-1196	-1202	-1135	-1149	-783	-1261	-624	-633	-117	-756
International net migration	586	577	202	-52	675	552	795	667	469	656	547	483	572	971	1698
Natural change	765	612	813	1027	995	1046	1281	1078	1384	1244	1266	1360	1248	1141	1196

Source: ONS Mid Year Estimates and components of change

3.72 The population of Oldham was estimated to be 235,100 in 2018 and this is projected to increase by 5.8% to 252,300 by 2037. Over the next few decades, there will be an increase in the number and proportion of older residents, with the amount of the population aged 65+ increasing by 35.7% from 37,800 in 2016 to 51,300 in 2037.

Economic Drivers

3.73 The LHNA found that across the borough 56.5% of Household Reference People (HRP) are economically active and a further 28.8% are retired from work.

3.74 Income levels are lower in Oldham than in the North West or England. According to the ONS Annual Survey of Hours and Earnings (ASHE):

- In 2018 lower quartile earnings were £18,093 compared to £19,972 for the North West and £21,273 for England; and
- In 2017 median earnings were £25,000 compared with £36,129 for the North West and £27,492 for England.

12 Source: Oldham LHNA 2019 (ONS Mid Year Estimates and components of change)

3.75 The survey identified that across the borough 19.4% of households receive less than £10,400 gross per year, 18.1% receive between £10,041 and £15,600 per year, 15.2% receive between £15,600 and £20,796 per year, 13.6% receive between £20,797 and £26,000, 16.3% receive between £26,001 and £39,000, and 17.4% receive at least £39,000 per year[(13)]. Income is further discussed below in relation to affordability.

Housing Stock

3.76 The study assumes a total of 92,821 households across the borough (as per council tax estimates, as of 2018). The dwelling vacancy rate is estimated at 1.2%.

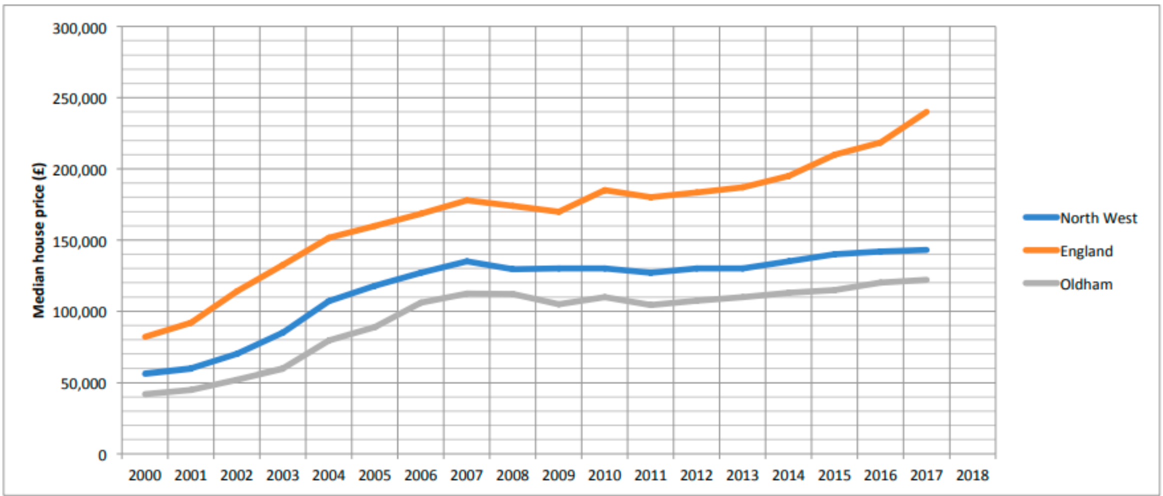
3.77 Overall the 2018 Household Survey shows that:

- 75.5% of occupied properties are houses (14.1% flats; 10% bungalows; and 0.4% other);
- 38.1% of occupied properties have three bedrooms (34.5% two bedrooms; 14.9% four or more bedrooms; and 12.3% one bedroom/ studio);
- The majority of occupied properties are owner-occupied at 64.9% of the total stock (20.9% are rented from a social housing provider; 13.6% are private rented; and 0/6% are intermediate tenure dwellings);

House prices

3.78 Median house prices in the borough have been consistently lower than those for the north west region, and England as a whole as shown in figure 14 [(14)].

Figure 14: Median house price trends 2000 to 2017,



Source: Data produced by Land Registry © Crown copyright 2018

3.79 As shown in Figure 14, following price stagnation, reflecting regional and national trends, during 2007 to 2012, the rate of growth has accelerated since, with the five-year period 2012-2017 seeing a rise from a median price of £107,500 to £122,000. Overall, median prices have increased from £42,000 in the year 2000 to £122,000 in 2017, an increase of 190.5%.

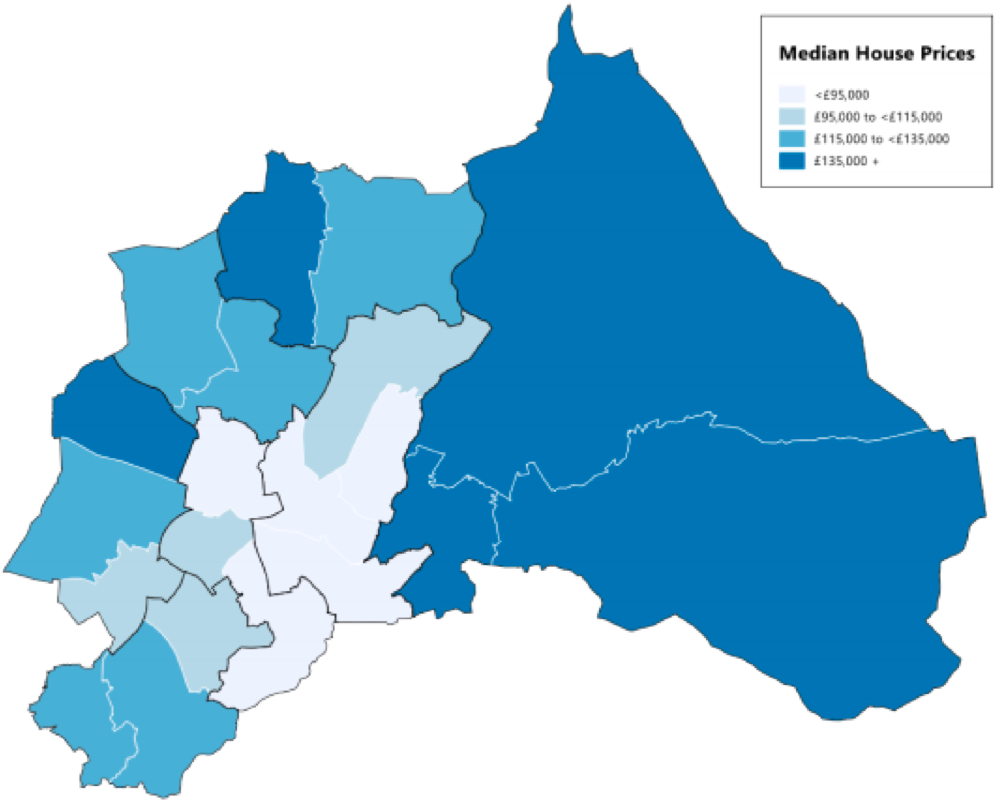
13 Source: Oldham LHNA 2019 (Data produced by Land Registry Crown copyright 2018, Zoopla 2018, CLG, ASHE 2017)

14 Source: Oldham LHNA 2019 (Data produced by Land Registry © Crown copyright 2018)

3.80 During 2017 median house prices across the borough were £122,000 and lower quartile prices were £84,000.

3.81 Figure 15 shows the spatial distribution of median house prices during 2017. The figure shows that higher prices are found in Saddleworth North and Saddleworth South wards and the lowest prices in Alexandra, Coldhurst and Medlock Vale wards.

Figure 15: Median house prices by ward 2017



Source: HM Land Registry data © Crown copyright and database right 2018. This data is licensed under the Open Government Licence v3.0

3.82 In terms of the relative affordability of open market dwellings, the Borough of Oldham is the fourth most affordable local authority area when looking at lower quartile prices compared to others across Greater Manchester and neighbouring districts. The LHNA identified that at an affordability ratio of 5.21 (2017) Oldham is more affordable than the North West and England [(15)]. The most recent affordability ratio (5.11) published by ONS in March 2021, indicates that Oldham's affordability has increased slightly, compared to 2017. However, it is likely that the Covid-19 pandemic has impacted on this figure, as Oldham's affordability has been (on average) continually worsening since 2000.

15 ONS Ratio of house price to residence-based earnings, 2017

3.83 Nevertheless it is interesting to note that in 2000, a household income of £6,943 was required for a lower quartile price to be affordable; by 2017 this had increased to £21,600. In comparison, an income of £10,800 was required for median priced housing to be affordable in 2000 with £31,371 in 2017 [16].

Migration

3.84 Data reported in the 2011 Census suggests that 74.8% of the households who moved in the year preceding the Census originated from within Oldham. This was followed 4.8% households moving from Manchester, 4.1% from Rochdale and 3.4% from Tameside [17],

3.85 The 2018 household survey carried out to inform the LHNA found that 21.1% of households planned to move in the next five years. Out of these, the majority of people (67.8%) want to remain living in Oldham as their first-choice destination. The survey found that 8.8% of households would like to move but are unable, the highest reason for which being that they cannot afford to move or or there was a lack of suitable accommodation.

3.86 The LHNA also provided a qualitative perspective on housing market dynamics and drivers, reflecting the above it found that the borough has a distinctive self contained housing market. Within the borough there are local housing markets of distinct characters made up primarily Saddleworth and Saddleworth villages and urban areas consisting of mill towns including Oldham Town Centre.

Geographical variances

3.87 The qualitative research carried out as part of the LHNA identified the following in relation to particular geographical areas across the borough:

- Saddleworth and Saddleworth villages - shortage of affordable housing; affordable housing considered best option to retain younger households in the area;
- Lees - an area of choice for Oldham residents that could not afford to live in the villages;
- Royton, Shaw and Crompton - more three-bed semi-detached properties required; shortage of housing for older persons;
- Chadderton - shortage of four-bed homes and opportunities for elderly downsizers;
- Failsworth - potential market for people seeking to relocate London and South Manchester; significant presence of former mill housing.
- Oldham Town Centre - a growing shortage of quality private rented sector housing; shortage of affordable housing; and
- Former mill stock - associated housing mostly small, densely built, two-bed terraced housing; where mills are derelict and in poor condition they are having a negative impact on surrounding area.

16 Source: Oldham LHNA 2019 (HM Land Registry data © Crown copyright and database right 2018. This data is licensed under the Open Government Licence v3.0)

17 Source: 2011 Census

Existing dwelling stock

3.88 With regards to vacancy levels the LHNA identified that there were 2,893 vacant dwellings (representing 3.1% of the total dwelling stock of 94,660) and 1,126 long-term vacant dwellings (1.2% of the total stock)[18]. This compares with national rates of 2.5% and 0.86% respectively in 2017.

3.89 As of 1 October 2020 there was estimated to be 1,919 vacant dwellings in the borough (representing 1.97% of the total dwelling stock of 97,079 as at 1 October 2020)[19].

3.90 The vacancy rate in the borough is in line with the 'transactional vacancy level' of 3%, which represents the proportion of stock which would normally be expected to be vacant to allow movement within the market.

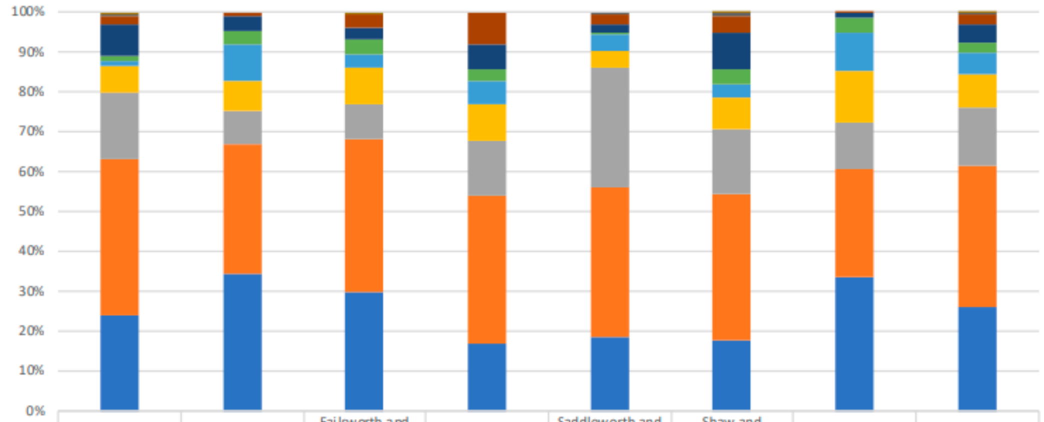
3.91 The LHNA[20] identifies that, based on the 2018 household survey the vast majority (75.5%) of occupied properties are housing, of which 12.5% are detached, 30.9% are semi-detached and 32.1% are terraced / town houses. 60.2% of the houses are two and three-bed. The lack of choice in terms of house size is further emphasised when considering all occupied dwellings, 72.9% of which are two and three bed properties.

3.92 Figure 16 below shows property size by type and district. It shows that:

- Saddleworth and Lees has the highest proportion larger detached properties whereas West and East Oldham have the lowest;
- West and East Oldham have the highest proportion of one and two bed properties and terraced houses and flats; and
- Royton, Shaw and Crompton have the highest proportion of bungalows whereas Saddleworth and Lees have the lowest.

18 Source: MHCLG dwelling stock statistics: https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants
19 As set out in the authorities Monitoring Report (2019/20). Data from the council's Housing Strategy Team (2020).
20 Source: LHNA 2019 - Tabe 4.5 'Dwelling type and size observations by district'

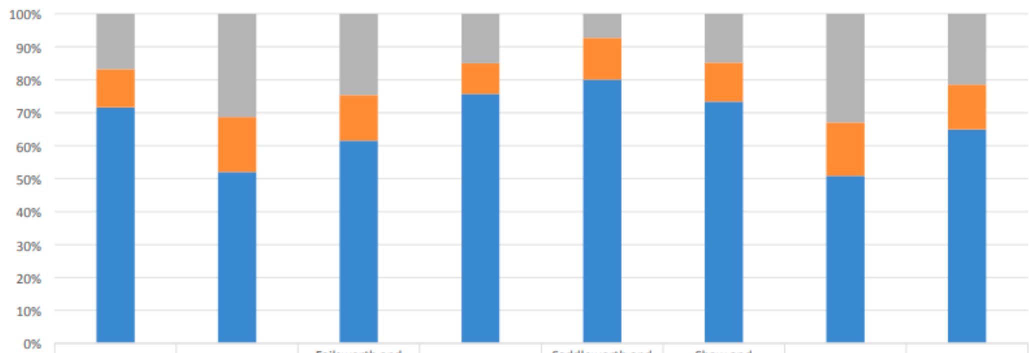
Figure 16: Property type and size



	Chadderton	East Oldham	Failsworth and Hollinwood	Royton	Saddleworth and Lees	Shaw and Crompton	West Oldham	Total
Other 3+ Bed	0.5	0.0	0.6	0.0	0.0	0.1	0.0	0.2
Other 1/2 Bed	0.7	0.0	0.0	0.0	0.4	0.8	0.0	0.2
3+ Bed Bungalow	1.8	1.1	3.3	8.1	2.8	4.4	0.2	2.7
2 Bed Bungalow	8.0	3.7	3.0	6.4	2.1	9.2	1.4	4.5
1 Bed Bungalow	1.3	3.5	3.6	2.7	0.3	3.8	3.7	2.7
2/3 Bed Flat	1.0	8.9	3.3	5.8	4.0	3.1	9.4	5.3
1 Bed Flat	6.9	7.9	9.4	9.1	4.3	8.1	13.2	8.3
4+ Bed House	16.7	8.2	8.6	13.9	30.0	16.1	11.4	14.6

3.93 Figure 17 is based on the 2018 household survey and shows the housing tenure of occupied properties across the borough[21]. 64.9% of occupied dwellings are owner occupied, 21.5% are affordable and 13.6% are private rented.

Figure 17: Household tenure by district



	Chadderton	East Oldham	Failsworth and Hollinwood	Royton	Saddleworth and Lees	Shaw and Crompton	West Oldham	Total
Affordable	16.7	31.3	24.6	15.0	7.2	14.8	33.0	21.5
Private Rented	11.6	16.7	13.9	9.2	12.7	11.8	16.1	13.6
Owner occupied	71.7	52.0	61.5	75.8	80.1	73.4	50.9	64.9

Source: 2018 Household Survey

3.94 In terms of affordable housing the highest proportion of occupied dwellings are in West and East Oldham (64.3%) and the lowest is in Saddleworth and Lees. The highest proportion of private rented sector housing is also to be found in East and West Oldham whom also have the lowest levels of owner occupied.

21 Source: LHNA 2019 - Figure 4.3 'Household tenure by district'

3.95 Whilst 64.9% of households are owner occupiers and a further 13.6% in private rented accommodation (see below), an analysis of house prices indicates that open market housing has become more expensive in the borough in recent years but prices are below national and regional levels.

Private Rented Sector

3.96 Table five shows that there has been an inflation increase of around 6% in median and lower quartile rental prices in the borough during the period.

Table 5 Comparative median and lower quartile rental prices 2010 - 2017

Location	Median price by year (£)		Median price % change	Lower quartile price by year (£)		Lower quartile price % change
	2010	2017	2010 - 2017	2010	2017	2010 - 2017
Oldham	472	498	5.5	425	451	6.1
North West	546	576	5.5	472	477	1.1
England	893	1,101	23.3%	598	676	13.0%

Source: Oldham LHNA 2019 (© 2018 Zoopla Limited)

3.97 In terms of income, the 2018 household survey found that 59.5% of households privately renting receive less that £18,200 gross per year, 18.1% received between £18,200 and £26,000 per year, 19.4% receive between £26,000 and £49,400 per year, and 3% received more than £49,400 per year.

Affordable housing sector

3.98 Of the 21.5% affordable housing 19,400 households live in social rented accommodation for a housing association (20.9%) and 553 (0.6%) live in intermediate tenure properties, mainly shared ownership. The figures below show how this in broken down by house type and size, based on the 2018 household survey.

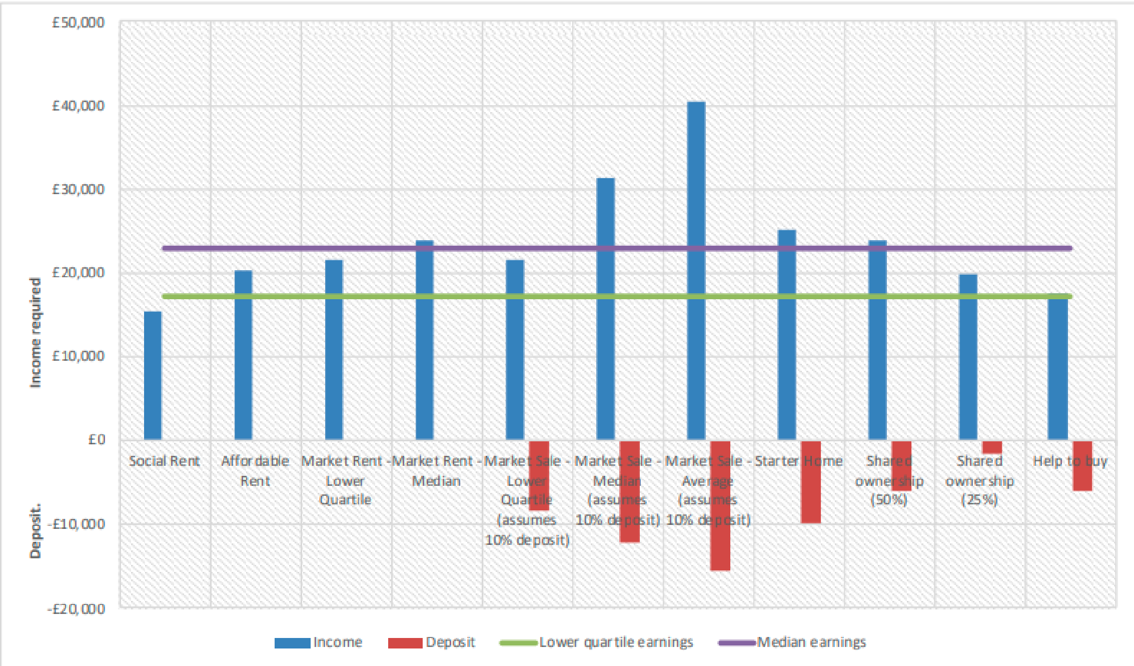
3.99 Incomes for those living in affordable housing are generally low, with 78.6% of households receiving an income of less that £18,200 gross per year (13% of which receive less than £5,200 a year). 15.7% receive between £18,200 and £26,000 per year, 4.8% receive between £26,000 and £49,400 per year, and 0.9% received more than £49,400 per year.

3.100 In terms of the potential to encourage higher-earning households currently living in affordable accommodation to consider intermediate tenure products, a 50% shared ownership product requires a household income of around £25,100. The 2018 household survey indicates that 5.7% of households in affordable housing have a gross annual income of £26,000 or more. Therefore, only a small proportion of those living in affordable housing would be able to to afford the transition from social rented to intermediate housing.

Affordability of housing tenure options

3.101 Figure 18 summarises in graphical form the relative affordability of alternative tenures at the borough level[22]. The figure sets out the income and deposit required for different options set against prevailing lower quartile and median earnings.

Figure 18: Household income required and housing costs



Source: Data produced by Land Registry © Crown copyright 2018, Zoopla 2018, CLG, ASHE 2017

3.102 Figure 18 shows that only social renting and help to buy is affordable for lower quartile earners. For median income earners, a broader range of tenure options are available including open market renting, lower quartile purchase and a range of intermediate tenure options.

3.103 Furthermore, from 1 April 2019 housing benefit has been restricted to the Local Housing Allowance (LHA) level for the size of the household along with the application of the new 'Shared Accommodation Rate' (SAR) for single people aged under 35, which may further impact on affordability.

The needs of different groups

Affordable housing

3.104 Affordable Housing Need is defined by NPPF as 'all households whose needs are not met by the market'. NPPF sets out the different forms of affordable housing.

22 Source: Oldham LHNA 2019 (Data produced by Land Registry © Crown copyright 2018, Zoopla 2018, CLG, ASHE 2017)

3.105 Based on the 2018 Household Survey, the LHNA identified that there were 10,173 existing households in need, representing 11% of all households. As shown in table 6 below the proportion of households in need is highest in West Oldham (16.2%), East Oldham (14.4%) and Chadderton (13.9%) and lowest in Shaw and Crompton (5.4%)[23].

Table 6 Proportion of households in need by District

Ward	Number of households in need	% of households in need	Total number of households
West Oldham	2,096	16.2	12,929
East Oldham	2,806	14.4	19.528
Chadderton	1,923	13.9	13,833
Failsworth and Hollinwood	1,145	8.2	13,998
Royton	692	7.3	9,421
Saddleworth and Lees	1,000	7.3	13,656
Shaw and Crompton	511	5.4	9,526
Total	10,173	11	92,891

3.106 The proportion of households in affordable housing need varies by tenure and household type for the borough. In terms of tenure, the private rented households are more likely to be in need (22% of households). For household types, larger families with dependent children (couples and lone parents) are more likely to be in housing need (42.9% of couples with three or more children under 18 are in housing need). The survey also identified 10,530 households with adult children living with parent(s), which provides an indication of the scale of hidden housing need. Of these 12.1% are categorised as being in housing need. Further information is available within the LHNA.

3.107 The LHNA has also considered the supply / demand variations by area and property size. Through this process the modelling suggests an annual net imbalance of 203 affordable dwellings across the borough. Analysis is based on the next five years and in the absence of any updated information this should be extrapolated forward to the Local Plan period.

3.108 In order to consider an appropriate affordable housing tenure split, the LHNA has considered national policy, past trends in delivery and the relative affordability of alternative tenure options. It recommends an affordable tenure split for the borough of around 50% social / affordable rented and 50% intermediate tenure. The approach also aligns with the NPPF, which requires 10% of new homes on larger sites to be made available for affordable home ownership. It should be noted that the introduction of 'First Homes', as set out in section 2.1 of this topic paper, requires 25% of affordable

23 Source: LHNA 2019 - Table 5.2 'Households in need by district'

housing provided on appropriate sites, to be 'First Homes'. The remaining 75% of affordable housing contribution can be allocated to other types of affordable housing, as required.

3.109 The LHNA has identified the property preferences of households in need by district, as set out in table seven.

Table 7 Property type preferences of households in need by district

Dwelling type	Chadderton	East Oldham	Failsworth and Hollinwood	Royton	Saddleworth and Lees	Shaw and Crompton	West Oldham	Total
House	54.0	48.6	48.1	53.6	54.7	37.1	50.8	50.9
Flat	23.1	33.3	35.5	28.9	28.0	32.2	33.1	31.7
Bungalow	19.9	12.8	11.8	13.5	11.5	21.4	12.0	12.7
Other	3.0	5.3	4.6	4.1	5.9	9.3	4.1	4.6
Total	100	100	100	100	100	100	100	100

3.110 The analysis across all districts indicates a mix of houses (50.9%) and flats (31.7%), bungalows (12.7%) and other types of dwelling (4.6%) would be appropriate.

3.111 In terms of the size of affordable dwellings required, the LHNA sets out that the overall imbalances (existing dwelling stock compared to property preferences of households in need) are 16.7% one-bedroom, 48.7% two-bedroom, 29.6% three-bedroom and 5% four or more bedrooms.

Housing for Older People

3.112 A major challenge for the council is to ensure that there is a range of appropriate housing provision, adaptation and support for the borough's older population. The number of people across the borough aged 65 or over is projected to increase from 37,800 in 2018 to 51,300 by 2037, a 35.7% increase [24]. Whilst according to 2014-based household projections [25], the number of households headed by someone aged 60 and over is expected to increase by 12,547 (36.6%) by 2037.

3.113 Substantial increases in the size of Oldham’s older population will drive increased demand for support to live independently (for example aid, adaptations and personal help). The changing age profile of Oldham’s population confirms that even with increased adaptation of homes as people become frailer, and even if new housing development was built to higher standards such as Lifetime Homes, there will be a continued need for more specialist housing for older people over the next 20 years.

3.114 Based on the 2018 household survey, the LHNA has identified that around 44% of older people live in three and four-bedroomed houses, around 21.4% live in bungalows, 18.7% in smaller houses and 15.1% live in flats. However, the survey has found that there were strong aspirations and expectations towards smaller dwellings (in particular

24 Source: Oldham, LHNA 2019 (ONS 2016-based Sub-national population projections)
25 Source: Oldham LHNA 2019 (CLG 2014-based household projections)

bungalows or level-access accommodation) and ‘other’ property types which include specialist provision within those households planning to move within the next five years, as set out in table eight.

Table 8 Future housing choices of older households (downsizing and upsizing)

Housing Choice	Aspiration (%)	Expectation (%)
Downsizing (moving to a smaller property)	40.4	53.4
Staying the same	43.9	33.8
Upsizing (moving to a larger property)	15.7	12.7
Total	100	100
Base (households responding)	5,435	4,180

3.115 The survey also found that the majority of older people would prefer to stay in their own homes with help and support when necessary. When asked about a range of housing options, 28% indicated that they would consider renting sheltered accommodation, whilst 18.6% would consider renting from a housing association, 17% renting extra care housing and 14.6% would prefer to buy on the open market.

3.116 Currently, there are around 4,718 units of specialist older person accommodation, including 1,640 units of residential care dwellings. Analysis indicates that 65.1% of specialist older person provision including sheltered housing is owned by registered providers and 34.9% by private organisations.

3.117 Analysis of demographic change suggests a need for an additional 2,459 units of older persons accommodation up to 2037. This is split 1,604 additional specialist older person's accommodation and 855 additional units of residential care provision.

3.118 In terms of the need for adaptations, the LHNA also considers needs are arising for people with additional needs, including optional accessibility and wheelchair standard housing. The 2018 household survey indicates that 9.1% of households live in properties that have been adapted or purpose built for those with an illness/ disability. The LHNA analyses this data further and highlights areas with high levels of adaptation and high levels of need for care/support, as well as identifying where there are lower levels of space available for a carer to stay overnight. In terms of dwellings already adapted or purpose built for a person with long term illness, health problem or disability, these are most prevalent in East Oldham (13.9%) and Chadderton (11.3%). These two districts also had the highest levels of care/support needs to enable household members to stay at their home and had the lowest proportions of dwellings with sufficient space for a carer to stay overnight.

Housing for Disabled Persons

3.119 The LHNA considers a range of data has been used to consider the housing needs of people with disabilities and additional needs, to set out the likely scale of residents who have particular disabilities and additional needs, as well as evidence regarding the nature of dwelling stock required to help meet the needs of different groups.

3.120 Across the borough, the 2018 household survey identified around 51,450 people who stated they had an illness/disability (21.9% of residents). A total of 43,200 households (46.5%) contained at least one person with at least one illness/disability.

3.121 As set out in the LHNA, the ONS Family Resources Survey provides national data on the number of people with disabilities by age group. This can be applied to population projections by age group to establish the potential number of residents who have a disability at the start of the plan period and how this is likely to change over the plan period 2018-2037. Although the number of people does not necessarily translate to a specific housing need, it provides a further insight into the likely level of disability experienced by residents in the borough. The LHNA identified that in 2018 it was estimated that there 46,786 people experiencing a disability, representing 19.9% of the borough's population (as of 2018). The proportion of residents with a disability is expected to increase by 21.5% (7,422) to 54,208 people by 2037 [(26)].

3.122 As stated above the 2018 household survey indicates that 9.1% of households live in properties that have been adapted or purpose built for those with an illness / disability. Analysis carried out for the LHNA suggests that the number of properties will need to increase by 1,343 to 2037.

3.123 In addition to the above, the 2018 household survey found that residents in 4.5% of all properties across the borough stated that they would need their dwelling to be wheelchair accessible. Demographic modelling of data therefore suggests that the number of wheelchair accessible dwellings needs to increase by 550 dwellings by 2037.

Family housing / households with children

3.124 Based on the 2018 household survey, the LHNA identifies that families with dependant children (aged under 18) account of around one-quarter, 21.1%, of households across the borough. A further 11.5% of all households are couples and lone parents with adult children (aged 18 or over) living with them.

3.125 The 2018 household survey assessed the current dwelling profile and market aspiration for family households across the borough. The survey found a particular aspiration for houses with three, four or more bedrooms. Of these, 35.3% would aspire to move to a property with 4 or more bedrooms.

3.126 In terms of housing need, compared with the overall proportion of households in need of 11%, around 14.3% of all families are in housing need. The proportion of households in need is highest amongst couples with 3 or more children under 18 (42.9%) and lone parents with 3 or more children under 18 (21.3%). Modelling of affordable housing requirements as part of the LHNA suggests that a range of affordable dwellings are required which will help to address the needs of families.

26 Source: Oldham LHNA 2019 (ONS Family Resources Survey 2016/17 and ONS 2016-based population)

Houses in Multiple Occupation

3.127 A house in multiple occupation (HMO) is a property rented out by at least three people who are not from one ‘household’ (for example a family) but share facilities like the bathroom and kitchen. The type of accomodation that could be classed as a HMO includes:

- A number of bedsits in one building;
- A hostel;
- Halls of residence (private);
- A shared house;
- A block of converted flats; and
- Individual shared self-contained cluster flats

3.128 Under Part 2 of the Housing Act 2004, owners and landlords must now get a licence to manage certain larger, higher-risk HMOs. Oldham Council are currently reviewing the standards for HMOs[27] and further information on management of HMOs is available on the council's website[28].

3.129 A licence is required for a ’large’ HMO, defined as a property where all of the following apply:

- It is rented for 5 or more people who form more than 1 household;
- Some or all tenants share toilet, bathroom or kitchen facilities; and
- At least one tenant pays rent (or their employer pays it for them).

3.130 The Town and Country Planning (Use Classes) Order 1987 classes HMOs of up to 6 residents as a 'C4 Houses in multiple occupation' use. HMOs with more than six residents are ‘Sui Generis’ use.

3.131 Some HMOs are also covered under ‘C3 Dwellingshouses’ use, such as HMOs of up to six people living together as a single household and receiving care and some groups of people (up to six) living together as a single household i.e. a small religious community or a homeowner living with a lodger.

3.132 Some developments relating to HMOs do not require planning permission and can currently be carried out under permitted development rights. Article 4 directions can be introduced to remove permitted development rights if it is believed that they may cause harm to local amenity or to protect local character or heritage from inappropriate development. Oldham currently has no article 4 directions removing permitted development rights for change of use to HMOs. As such, changes of use from dwelling houses to small HMOs can be carried out under permitted development rights. Larger HMOs require planning permission and depending on the works to be carried out, all HMOs are likely to require building control approval.

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27 Previous HMO standards were published by the council in 2010

28 Houses in Multiple Occupation: https://www.oldham.gov.uk/info/201198/help_for_landlords/258/houses_in_multiple_occupation

3.133 In order to scope the extent and spread of HMOs within the borough, the impact they may be having on the communities, and to identify if future policy intervention is required to manage and support HMOs, evidence has been gathered as part of the Local Plan Review. Evidence from the Local Housing Needs Assessment (LHNA) will also inform the Local Plan Review.

3.134 The LHNA has found that there are various potential issues relating to HMOs in the borough including:

- Increased demand for private-rented accommodation, particularly for younger people;
- High levels of poor housing conditions amongst the private-rented sector (particularly in East and West Oldham);
- A growing shortage of quality private rented sector housing within Oldham Town Centre;
- Dissatisfaction amongst residents of the private-rented sector in relation to housing quality; and
- Private-rented sector creating transient population who could be less committed to the community.

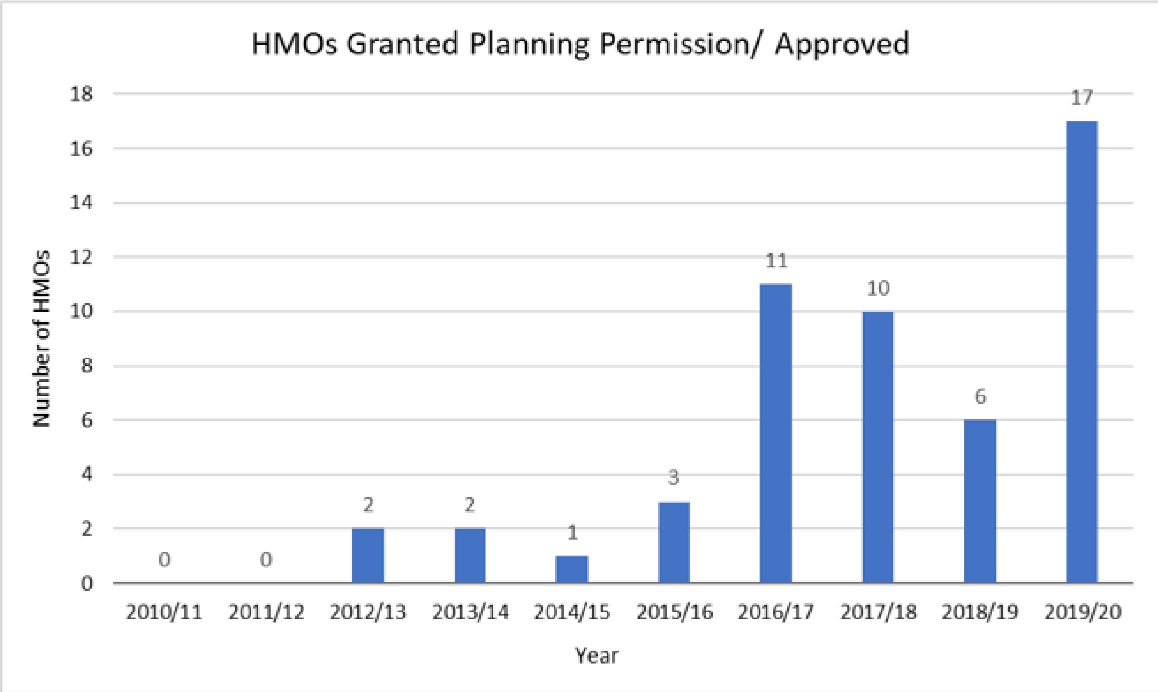
3.135 According to research undertaken as part of the Local Plan Review evidence base and official records, there are 306 recorded HMO in the borough, as at December 2020, 68 of which are licensed. HMOs represent 0.3% of the borough's total dwelling stock (95,505 dwellings), as of 2019/20.

3.136 Whilst checks were made against each address and data source, there is likely to be a small level of inaccuracy due to the volume of addresses and each team’s data handling/ updating procedures.

HMO permissions/ approvals through the planning system

3.137 Over the past ten years (2010/11-2019/20) there have been 33 applications for HMOs granted planning permission and a further 19 approved as permitted development (prior approval or certificate of lawfulness). Of the 52 granted permission/ approved, 47 still exist, 3 have extant planning permission and 2 have not been implemented. The following figure sets out the number of HMOs granted planning permission or approved by year.

Figure 19: HMOs granted planning permission 2010 to 2020

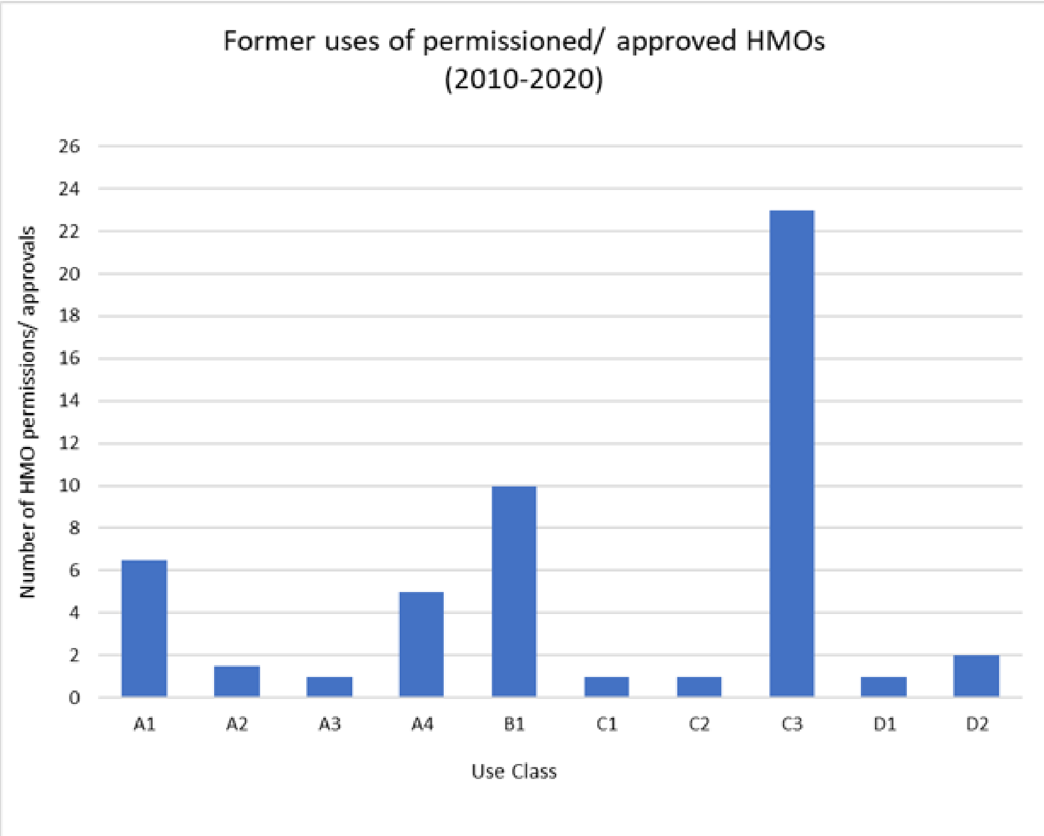


3.138 Figure 19 shows that there has been a significant increase in the number of HMOs being granted permission/ approved in recent years, with 85% of all HMOs granted permission/ approved over the last ten years, being granted/ approved within the last four years (2016/17 to 2019/20). Indeed, 33% of all HMOs granted permission/ approved over the last ten years, have been granted/ approved in 2019/20 alone.

Property type

3.139 The 52 HMOs granted planning permission/ approved has created an additional 265 bedrooms when comparing the number of bedrooms which existed in these properties prior to change of use to a HMO (115 bedrooms), and the number of bedrooms in the property after change of use to a HMO (380 bedrooms). The most common type of property lost to the creation of a new HMO is the change of use from dwelling house (C3). Figure 20 shows the former uses of buildings granted planning permission or approved for change of use to HMO over the past 10 years.

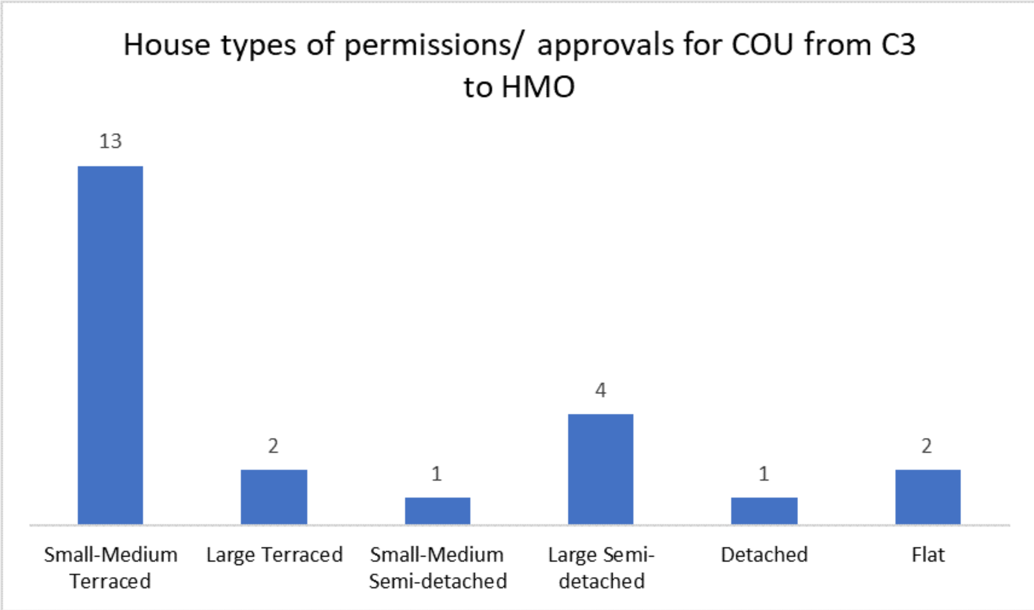
Figure 20: Former uses of permissioned/ approved HMOs 2010 to 2020



3.140 As figure 20 shows, the majority of HMOs approved over the past ten years were formerly dwellings. Whilst this does not technically equate to a loss of a residential unit, as per planning guidance, it could mean the loss of a family home. Of the C3 uses changed to HMOs over the last ten years, there has been a net increase of 33 bedrooms.

3.141 Figure 20 shows the types of formerly residential (single family household) properties granted permission or approved for HMOs over the past ten years. In terms of the types of properties granted permission/ approved for change of use from C3 'dwelling house' to a HMO, 56% were small-medium terraced houses, indicating that of HMOs coming through the planning system, the properties lost to this use tend to be smaller properties, rather than larger family homes. As such, whilst this is not evidence of an issue involving the loss of larger family homes to HMOs, which are needed within the borough (as identified in the LHNA) and can be an issue in some areas with high number of HMOs, it may be indicative of issues such as overcrowding and poor living conditions. Where smaller homes are converted into HMOs, the units of individual accommodation created could be smaller and not meet the minimum space standards.

Figure 21: House types of permissioned/ approved HMOs for C3 to HMO use

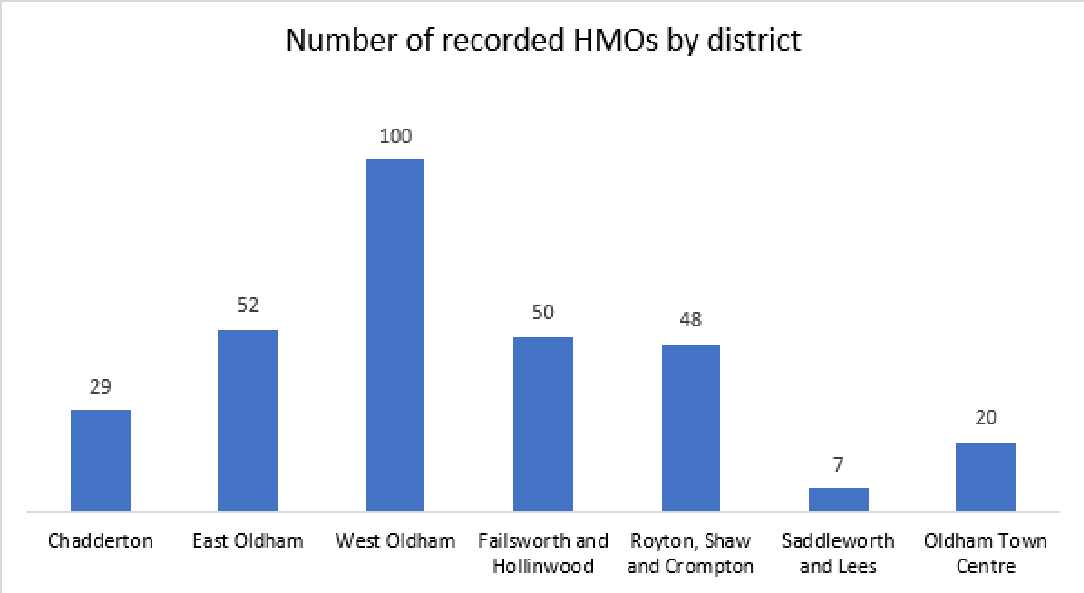


3.142 The LHNA shows that there is a limited supply of affordable shared accommodation in the borough and it is recognised that there is a need to develop this sector to offer affordable, suitable shared accommodation options. However, as evidence has shown the types of properties coming through the planning system being converted to HMOs tend to be smaller properties in the majority. As such, there is a need to ensure quality shared accommodation is achieved which meets minimum space standards and does not contribute to overcrowding.

Spatial distribution

3.143 In terms of the spatial distribution of recorded HMOs in the borough, figure 22 sets out the number of recorded HMOs by district.

Figure 22: Number of recorded HMOs by district



3.144 West Oldham has significantly more recorded HMOs than any other district with nearly a third of the borough total (32%). East Oldham (17%), Failsworth and Hollinwood(16%), and Royton, Shaw and Crompton (16%) all have a similar proportion of the borough's recorded HMOs. Whilst Saddleworth and Lees has significantly less (2%).

3.145 Similarly, in terms of HMOs as a proportion of individual district housing stock, based on the district housing stock estimates as identified in the LHNA[29], West Oldham has proportionally the highest number of HMOs per district stock (0.72% of the total district stock) and Saddleworth and Lees the least (0.0005% of the total district stock).

3.146 Proportionally Oldham Town Centre has a significant proportion of the borough's HMOs, however this it to be expected, given the services, facilities and transport links of the town centre location. However, in terms of total number of recorded HMOs, the district's centres only make up around 8.2%, with Oldham Town Centre representing 6.5% of the borough's total alone. (Failsworth and Hollinwood – 0; Hill Stores – 0; Royton - 0; Chadderton – 1; Lees – 1; Uppermill 1; Shaw – 2; OTC – 20).

3.147 In relation to Oldham Town Centre, the above findings may support the findings from the LHNA that there is a growing shortage of quality private rented sector housing within Oldham Town Centre, whereby although it is difficult to draw conclusions, the findings may indicate of a lack of affordable housing within Oldham Town Centre, with people seeking alternative accommodation within HMOs, which still have access to the facilities and services of the location, including public transport links, shops, banks and public services.

3.148 Areas where there are high concentrations of HMOs can experience issues such as increased parking pressure, increased demand for public services, poor environmental quality, impact on property prices and more transient populations (leading or contributing to issues of amenity, noise and community cohesion).

29 Source: LHNA 2019, Table 4.2 'Estimate of households by district' (Council Tax data 2018)

3.149 The district maps (Appendix 1) do not appear to identify any significant concentrations of HMOs within the borough, i.e. a number of HMOs located on the same street and/or adjacent to one another. Although, there appear to be a higher number of HMOs located within several neighbourhood areas, including Werneth, Clarksfield, Coppice, Hathershaw, Greenacres, Shaw Town Centre, Hollinwood and Failsworth Town Centre. In defining what level of a concentration of HMOs could be an issue to the wider neighbourhood/ area, it is important to identify and assess collective issues impacting an area, that could be linked to a higher proportion of HMOs located within a defined area. Further work will be carried out to understand if there are such issues within particular areas in the borough, including assessing the consultation responses of the council's selective licensing review.

Access to public transport

3.150 Over half (157) of the borough's recorded HMOs are located within 800m of a Metrolink station and three are located within 800m of a train station (Moston, Mills Hill and Greenfield).

3.151 There is little evidence to indicate that car usage amongst HMO residents is any different than that of private accommodation residents. However HMOs can typically be a lower cost form of accommodation and as such appeal to those with lower incomes, where levels of car ownership are likely to be lower. As such, it is important to ensure HMOs are located sustainably with access to public transport within a suitable walking distance, in order to serve residents of these properties who may be more likely to be users of public transport and to alleviate parking pressure, particularly for areas with higher levels of on-street parking and higher density housing, such as terraced streets.

HMO Standards

3.152 It is important to ensure that HMOs are well managed, provide safe and quality accommodation, do not negatively impact on the amenity of neighbouring properties or the wider local area. The council is currently reviewing it's HMO standards guidance. This guidance will be considered by the Local Plan as appropriate to ensure the Local Plan supports quality housing to meet the needs of residents of the borough.

Oldham's Selective Licensing Scheme

3.153 The Housing Act (2004) gives the power to introduce the licensing of the private rented sector with the aim of improving the management of these properties to tackle low housing demand or anti-social behaviour. In 2014 Oldham Council designated a selective licensing scheme in 8 neighbourhoods which were seen to be exhibiting signs of low housing demand following a statistical analysis of the whole borough. Low housing demand is where there is a high number of private rented properties, people are moving and only staying for short periods, house prices and rental prices are low meaning owner occupiers are often in negative equity. This results in it being very difficult for a strong community to be developed and maintained in the area.

3.154 The aim of Selective Licensing is to improve the management of these properties to ensure they have a positive impact on the area. The arrangements that have been in place since 2015 in Oldham have now expired, as such a review of the impact of the scheme has been carried out[30]. This review has indicated some improvements in the neighbourhoods concerned and shows that other neighbourhoods are now exhibiting signs of low housing demand.

3.155 Due to the results of the review, it is considered that the introduction of a new licensing of private landlords scheme is needed in certain areas. In order to seek views on the approach, a consultation was carried out from January 2021 to April 2021. The results of the consultation will be available in due course and will be considered, as appropriate, at a future stage of the Local Plan Review.

Self-Build and Custom housebuilding

3.156 Oldham Council maintain a register of individuals and groups who wish to self or custom build in the local area. As table nine shows as of 30th October 2020, there were 334 entries (individuals) on the register in total. During 2019/20 79 individuals were added to the register.

Table 9 Number of entries on self/ custom build register by base period

Base Period	Number of entries added
1 April 2016 to 30th October 2016	102
31st October 2016 to 30th October 2017	46
31st October 2017 to 30th October 2018	29
31st October 2018 to 30th October 2019	78
31st October 2019 to 30th October 2020	79
Total	334

3.157 At the 30th October 2019, 70 suitable plots for self or custom build have been granted planning permission, meaning Oldham was therefore unable to evidence that we have met demand for the 102 entries on the register during the first base period of 1st April 2016 to 30th October 2016 as required by the Self-build and Custom Housebuilding Act 2015 [31]. At the 30th October 2020, 25 suitable plots for self or custom build have been granted planning permission, meaning Oldham was therefore unable to evidence that we have met demand for the 46 entries on the register during the second base period of 31st October 2016 and 30th October 2017.

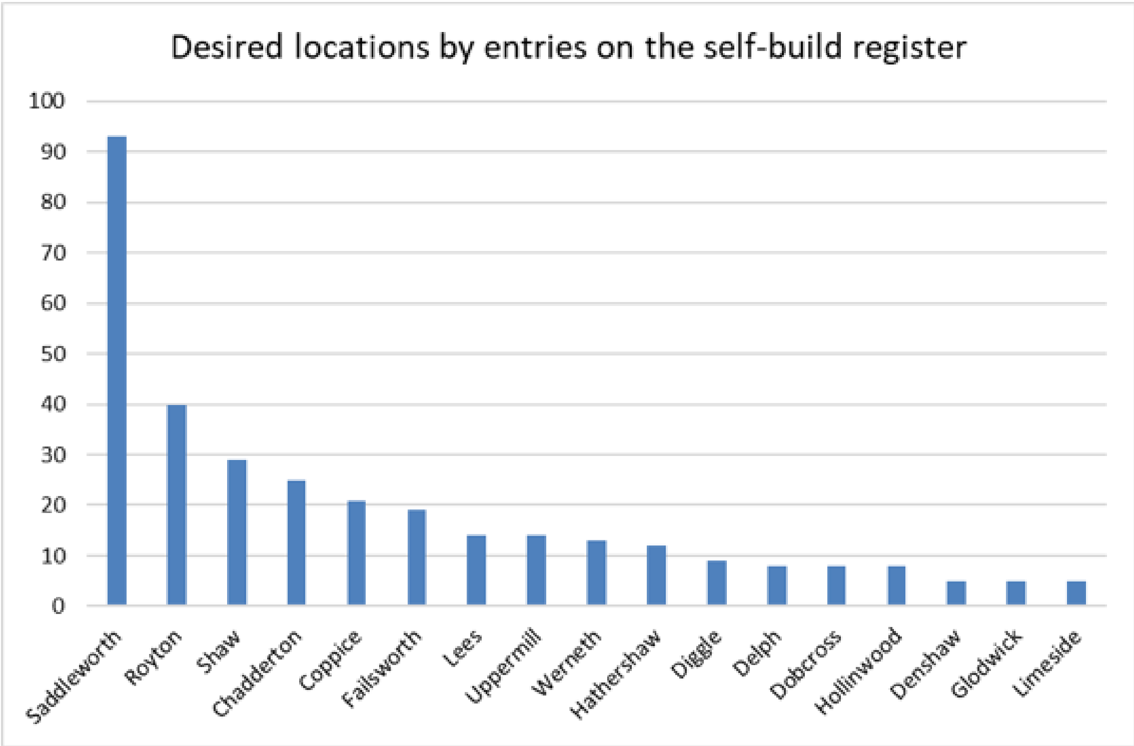
3.158 Analysis of the self-build and custom housebuilding register as at 31st October 2020 shows that out of the locations specifically mentioned by the entrant, Saddleworth is the most desired location for a plot, with 29% of entries citing Saddleworth as a desired location. All the main settlements of Uppermill, Greenfield, Delph, Denshaw, Diggle and Dobcross within Saddleworth were cited (16% of entries), however Uppermill is the most cited location within Saddleworth. Royton, Shaw and Chadderton are the next most cited locations for plots with 12%, 9% and 7% of entries respectively. Other

30 Selective Licensing of the Private Rented Sector - Review, available at: https://www.oldham.gov.uk/info/201198/help_for_landlords/1450/selective_licensing_of_private_landlords

31 http://www.legislation.gov.uk/ukpga/2015/17/contents

areas with a notable number of entries stating it as a desired location for plots are Coppice, Failsworth, Lees, Werneth and Hathershaw. Figure 23 shows the desired locations for self-build plots as per entries on the register (locations with 5 or more entries only)*.

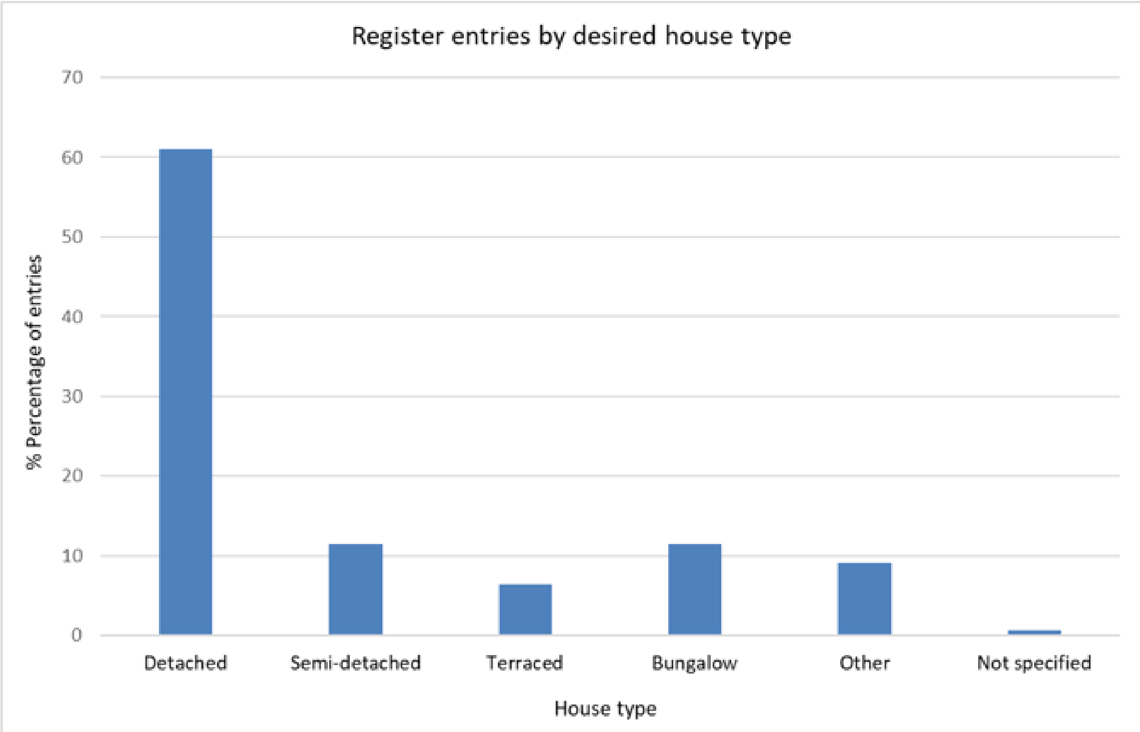
Figure 23: Desired locations for self/ custom build plots



*A number of entries specified more than one desired location - these have been counted individually as per each location specified.

3.159 In terms of house type, the majority of register entries (61%) specify 'detached' properties as the desired house type. Figure 24 sets out the desired house types by entry:

Figure 24: Register entries by desired house type



*A number of entries specified more than one house type - these have been counted individually as per each house type specified.

3.160 The above echo's the findings of the LHNA which show that property type preferences were highest for houses (42.3% of households would like a detached house), compared to flats, bungalows and other forms of dwellings.

3.161 Figure 25 sets out the number of bedrooms per property desired as per entries on the register:

Figure 25: Desired number of bedrooms by register entries

*A number of entries specified more than one bedroom number - these have been counted individually as per each bedroom number specified.

3.162 As figure 25 shows 66% of entries specify a desire for four-bedroomed properties (34%) or three-bedroomed properties (32%). This echo's the findings of the LHNA, which also found that of those households planning to move in the next five years, around 62% of households would like three or more bedrooms and 55.5% would expect three bedrooms as a minimum in their next property. This highlights that the motivations for people registering for self and custom-build may be because their requirements cannot be met by the existing housing stock.

3.163 Table ten sets out the most specified house type and number of bedrooms for each of the 4 most desired locations as specified by entries on the register.

Table 10 Most desired house type and size by cited district of register entries

Area	Saddleworth	Royton	Shaw	Chadderton
Most desired house type	Detached	Detached	Detached	Detached
Percentage of entries	81%	66%	65%	71%
Most desired number of beds	4	3	3/4	4
Percentage of entries	45%	39%	69%	42%

3.164 As shown in the table above, in each of the most desired locations detached property is the most sought after and three and four bedrooms. This correlates with findings of the LHNA, which found that for Royton and Shaw more three-bed homes are required and for Chadderton were there is a shortage of four-bed homes. Furthermore, West Oldham, which includes Chadderton, also has the second to lowest number of detached properties in the borough.

3.165 The analysis for entries citing Saddleworth as a desired location also correlate with findings of the LHNA, in that household income is the highest in Saddleworth areas, as are house prices. As such, self and custom-build as an option to home ownership may be more accessible for people living or desiring to live within Saddleworth, given access to higher incomes.

3.166 The council is committed to ensuring self and custom build demand is met in the future. Self and custom build is promoted within Oldham's recently published Housing Strategy and Housing Delivery Action Plan. Within both documents there are specific actions related to ensuring small site development is increased and supported as appropriate.

Black and minority ethnic households (BAME)

3.167 The LHNA (2019), based on the 2018 household survey, identified that 89.1% of Household Reference People (HRP) describe themselves as White British and 10.8% describe themselves as having other ethnicities. Of these:

- 6.2% are Asian or Asian British;
- 1.5% White Central / Eastern European;
- 1.3% are Black, African, Caribbean or Black British;
- 0.7% are White Other;
- 0.3% are White Irish;
- 0.5% are mixed ethnicity; and
- 0.3% are other ethnic groups.

3.168 In terms of spatial distribution a higher proportion of HRPs identified as Asian or Asian British are in West Oldham (22.3%), Chadderton (7.4%) and East Oldham (6.6%) compared to the borough average of 6.2%. In East Oldham a high of 3.9% HRPs identified as White Central/Eastern European, compared with the borough-wide average of 1.5%.

3.169 Based on the 2018 household survey, of BAME households, around 54.3% are owner occupiers, 19% rent privately and 26.7% live in affordable housing (social rented or intermediate tenures). Compared to the borough average (63.3%), the number of BAME owner occupiers is 10% lower; the number of BAME households who rent privately is 4% higher; and the number of BAME households living in affordable housing is 5% higher.

3.170 The 2018 household survey also found that 27.8% of BAME households were in some form of housing need, compared to 11% of all households (borough-wide). The main reason for housing need was overcrowding. This is reflected in the analysis regarding aspirations for moving BAME households, which suggested a particular aspirations towards larger dwellings (38.5% 3 bedroom houses and 37.6% four or more bedroom houses). Expectations were 46.5% 3 bedroom houses and 34.7% four or more bedroom houses.

3.171 It was noted in the LHNA (2019) that in terms of the household survey response and available evidence, there was a under-representation of BAME households. It states that further evidence is needed to help understand the needs of those particular communities in greater detail and further deepen this evidence base to inform future planning and housing strategies.

Gypsy, Travellers and Travelling Showpeople

3.172 The 2011 Census identified that within Oldham 62 people with Gypsy and Traveller ethnicity were living in 21 households. All households lived in bricks and mortar housing[32].

3.173 The latest 2017 Greater Manchester Gypsy and Traveller Accommodation Assessment (GTAA) identified no Gypsy and Travellers living on sites or Travelling Showpeople living on yards in Oldham. The GTAA identified no need for pitches or plots in Oldham. A total of 59 transit pitches are required across Greater Manchester.

Dwelling type and mix

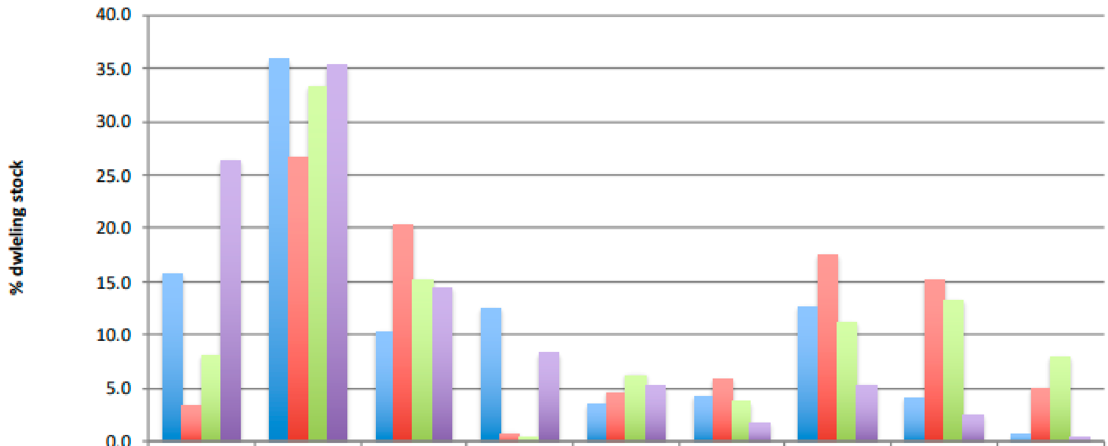
3.174 The LHNA (2019) provides details regarding the dwelling type and size mix needed in Oldham over the plan period, based on analysis of household projections (in this case the latest ONS 2014-based household projections) and the 2018 household survey. By doing so the LHNA has modelled three different scenarios showing the likely change in dwelling type and size requirements:

- The current relationship between HRP / household type and dwelling type / size and this remains constant over the plan period (demographic baseline);
- Household aspirations by HRP / household type (aspirations); and
- What households would expect by HRP / household type (expectations).

3.175 Figure 26 below illustrates the variance between current stock and the alternative dwelling mix scenarios listed above[33].

32 Source: LHNA (2019), para.6.74.
33 Source: LHNA (2019) Figure 7.2 'Summary of dwelling types under baseline demographic and aspiration/ expectation scenarios' (Household Survey 2018 data)

Figure 26: Summary of dwelling types under baseline demographic and aspiration/expectation scenarios



	1/2 Bed House	3 Bed House	4+ Bed House	1 Bed Flat	2/3 Bed Flat	1 Bed Bungalow	2 Bed Bungalow	3+ Bed Bungalow	Other
Demographic	15.8	35.9	10.3	12.5	3.7	4.3	12.7	4.1	0.7
Aspiration	3.4	26.7	20.3	0.9	4.8	5.9	17.7	15.2	5.1
Expection	8.2	33.3	15.2	0.6	6.3	3.8	11.4	13.3	8.1
current stock	26.3	35.2	14.6	8.3	5.3	1.8	5.4	2.6	0.5

Dwelling type and size

Source: 2018 Household Survey

3.176 Under the baseline demographic scenario, delivery of three bed houses, one bed flats and an increasing proportion of bungalows are identified. An increase in bungalows of all bed numbers is also identified in the aspirational and expected scenarios, along with an increase in four bed plus houses. The aspirational and expected scenarios also demonstrated a marked increase in two and three plus bed flats and an decrease in one bed properties.

3.177 Table 11 below illustrates the range of dwellings (type and size) and tenure appropriate for Oldham under a baseline demographic scenario.

Table 11 Overall dwelling type / size and tenure mix under baseline demographic scenario

Dwelling type / size	Tenure		
	Market (70%)	Affordable (30%)	Total
1/ 2 bedroom house	67	46	113
3 bedroom house	202	55	257
4+ bedroom house	63	10	74
1 bedroom flat	64	26	90
2 / 3 bedroom flat	-17	43	26
1 / 2 bedroom bungalow	102	20	122

Dwelling type / size	Tenure		
	Market (70%)	Affordable (30%)	Total
3+ bedroom bungalow	27	2	30
Other	5	0	5
Total	513	203	716
Dwelling type	**Market (70%)**	**Affordable (30%)**	**Total**
House	332	112	443
Flat	47	69	116
Bungalow	129	22	151
Other	5	0	5
Total	513	203	716
Number of bedrooms	**Market (70%)**	**Affordable (30%)**	**Total**
1	90	34	123
2	130	99	228
3	230	60	291
4	63	10	74
Total	513	203	716

3.178 The above explores the relationship between households and occupied dwellings, to provide an indication regarding an appropriate dwelling mix to inform preparation of the Local Plan. Whilst table 11 is based on the demographic baseline scenario, the aspirational and expectant scenarios also provide a useful indication regarding the type of properties Oldham residents aspire and expect when moving home. The council can use this information to make informed strategic decisions in the range of dwellings to be built over the plan period.

Housing Densities

National Policy on Density

3.179 Chapter 11 of NPPF 'Making effective use of land' states that planning policies should "promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs , in a way that makes as much use as possible of previously-developed or 'brownfield' land.

3.180 In relation to density, paragraph 118 states that planning policies and decisions should:

- promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards and railway infrastructure; and
- support opportunities to use the airspace above existing residential and commercial premised for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed and can maintain safe access and egress for occupiers.

3.181 In terms of achieving appropriate densities, paragraph 122 states that planning policies and decisions should support development that makes efficient use of land, taking into account:

a. the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
b. local market conditions and viability;
c. the availability and capacity of infrastructure and services - both existing and proposed - as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
d. the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
e. the importance of securing well-designed, attractive and healthy places.

3.182 Paragraph 123 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important to avoid homes being built at low densities, and ensure optimal use is made of the potential of each site. This is to be achieved by:

- policies which optimise the use of land in the area, including the use of minimum density standards for town centres and locations well served by public transport. This should also be considered in other locations where it may be appropriate to set out a range of densities;

- applications could be refused if they make inefficient use of land and local authorities may take a flexible approach to policies on daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as acceptable living standards are achieved).

GMSF Density Policy, (GMSF Publication Plan Draft for Approval October 2020)

3.183 Chapter 7 (Policy GM-H 4) of GMSF Publication Plan Draft for Approval October 2020 sets out the density policy for new housing. It states that increasing the average density of new housing developments in the most accessible locations is an important part of the overall strategy for GM and will provide several benefits. It will reduce the amount of land that needs to be used for development, thereby reducing the need for greenfield and Green Belt land. It will help to minimise the need to travel, enabling more people to live close to shops and services, and increasing the local population necessary to support local facilities and regeneration. It will also allow for greater uptake of sustainable transport options, reducing the demand for car-based travel. It also directly supports the Mayor's Town Centre Challenge.

3.184 The draft set out proposed density assumptions for new housing developments. The assumptions are set out in table 12 overleaf:

Table 12 GMSF Publication Plan Draft for Approval October 2020

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			

3.185 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.

3.186 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.

Oldham's Approach to Housing Density

3.187 Table 13 shows the densities achieved on schemes of 5 dwellings and more over the past five years. On average 84% of all dwellings completed over the last five years have been delivered on schemes exceeding 30 dwellings per hectare, demonstrating effective and efficient use of land.

Table 13 Housing densities achieved on schemes of 5 dwellings and more 2015 to 2020

Year	2015/16		2016/17		2017/18		2018/19		2019/20	
Total number of dwellings completed*	296		374		345		410		728	
Density	No.	%	No.	%	No.	%	No.	%	No.	%
Less than 30 dwellings per hectare	17	6.8%	73	21.8%	57	23.8%	79	23.6%	158	23.5%
30 to 50 dwellings per hectare	182	73.1%	213	63.6%	151	63.2%	79	23.6%	313	46.6%
Over 50 dwellings per hectare	50	20.1%	49	14.6%	31	13%	176	52.7%	200	29.8%

3.188 *Figures quoted are based on the data as set out within the 2019/20 Monitoring Report. As is set out in the 2018/19 Monitoring Report monitoring anomalies found for some previous years, means the figures set out in the Monitoring Reports prior to 2018/19 may be incorrect.

3.189 Table 14 shows the indicative density of sites within the housing land supply as at 1 April 2020, as set out in the SHLAA.

Table 14 Indicative density of sites within the future housing land supply (as at 1 April 2020)

Category	Less than 30 dwellings per hectare		30 to 50 dwellings per hectare		Over 50 dwellings per hectare	
	Number of sites	Number of dwellings	Number of sites	Number of dwellings	Number of sites	Number of dwellings
Under construction	70	455	14	172	51	458
Planning permission	71	521	26	128	71	396

Category	Less than 30 dwellings per hectare		30 to 50 dwellings per hectare		Over 50 dwellings per hectare	
	Number of sites	Number of dwellings	Number of sites	Number of dwellings	Number of sites	Number of dwellings
Phase 1 housing allocations	3	74	3	62	3	238
Phase 2 housing allocations	2	172	4	133	0	0
Lapsed and stalled (5 dwellings and above)	9	150	1	15	30	764
Potential	6	95	35	1,550	63	5,323
Total	161	1,467	83	2,060	218	7,179

3.190 Table 13 shows that 85% of the total future housing land supply is on sites of 30 dwellings per hectare and above. Indeed, 67% is on sites of over 50 dwellings per hectare. This indicates that the future housing land supply makes efficient use of land.

3.191 Sites within the 'Potential Sites' category makes the most efficient use of land, with 60% of sites within this category achieving a density of 50 dwellings per hectare and above. This category includes a number of large, high density sites within Oldham Town Centre, identified within the Residential Delivery Framework.

Standards and Design

Lifetime Homes

3.192 The concept of Lifetime Homes was developed because of concerns about how inaccessible and inconvenient many homes were for large sections of the population, to ensure that homes are accessible and inclusive. These types of home are designed to be flexible and adaptable, to encourage better living environments for everyone, throughout the different stages of their lives. Good design, in this context, maximises utility, independence and quality of life, while not compromising other design issues such as aesthetics or cost effectiveness.

3.193 Lifetime Homes are designed to incorporate 16 Design Criteria that can be applied to new homes at minimal cost, including those relating to parking, entrances, communal stairs and lifts, internal doorways and hallways, circulation space, entrance level living and bed-space, entrance level WC and drainage, glazing and window heights and location of service controls.

3.194 MHCLG has recently carried out consultation on raising accessibility standards for new homes [34], recognising the importance of suitable homes for older and disabled people. The consultation sets out five broad policy options for how to raise the accessibility of new homes. These options consider whether to wait to see the full impact of recent planning policy changes set out in NPPF on the use of the optional technical standards; or whether changes can be made by either requiring a higher standard or reviewing how existing optional standards are used. These changes would only apply to new homes and not to the refurbishment of existing homes.

3.195 Consideration will need to be given to the outcome of this consultation when preparing the relevant policies as part of the Local Plan review.

Lifetime Neighbourhoods

3.196 The Lifetime Homes concept also embraces the idea of the Lifetime Neighbourhood which is one in which civic and social processes, together with physical conditions, achieve the following outcomes:

- An environment that is accessible and inclusive, aesthetically pleasing and safe (in terms of both traffic and crime)
- A community that offers plenty of services, facilities and open space
- A strong social and civic fabric, including volunteering and informal networks
- A culture of consultation and user empowerment amongst decision makers
- A strong local identity and sense of place

3.197 A lifetime neighbourhood would provide all residents with the best possible chance of health, wellbeing and social inclusion, particularly as they grow older. This would require an accessible and pleasant built environment in which all ages are not necessarily excluded by age, physical or cognitive ability. Issues of lifetime neighbourhoods and the impact of population ageing should be well represented in planning documents.

Parking

3.198 NPPF states that, if setting local parking standards for residential development, the following should be taken into account:

- the accessibility of the development
- the type, mix and use of development
- the availability of and opportunities for public transport
- local car ownership levels
- an overall need to reduce the use of high-emission vehicles

3.199 A review of local parking standards will be considered as part of the Local Plan review.

34 Raising accessibility standards for new homes - GOV.UK (www.gov.uk)

4 Consultation

4.1 To begin preparation of the Local Plan the council carried out a 'Regulation 18' notification between July and August 2017.

4.2 To inform this work we asked what the local community and stakeholders thought:

a. the Local Plan should contain and what the key planning issues are for Oldham; and
b. what, in broad terms, should be the main aims of the Local Plan.

4.3 In addition we published our Integrated Assessment Scoping Report and invited the Environment Agency, Historic England and Natural England to comment on the scope of the Local Plan. This was also available for the local community and stakeholders to view and comment on if they wished.

4.4 The main comments that came from the consultation in relation to Housing are set out below.

Thematic

4.5 **General**

- Need to decide on our priority - more homes or better homes;
- Current Local Plan housing are out of date and not fit for purpose;
- Policy framework needs to provide flexibility so as to respond to change in circumstances and individual site / area requirements;
- A strategy for ensuring the longer term sustainability of areas should also be clearly set out. A range of mixed use developments, and mixed tenure should be encouraged to ensure residents can stay within their neighbourhoods as their needs and aspirations change;
- Tackling homelessness and homes for younger people are areas of increasing demand. The Local Plan needs to consider how existing housing quality can be improved, remodelled and regenerated to complement supply;

4.6 **Type of Housing**

- Housing offer - need to range of high quality housing that meets local housing needs whilst contributing to the creation of mixed, balanced and sustainable communities;
- Increase in private rented sector is leading to a high turnover of temporary residents. The creates a transient population that is less committed to the area;
- As well as three and four bedroom homes need to build 'better' smaller homes;

- There is an issue with mono-types of housing – would like to see intervention to change the housing mix e.g. through estate remodelling. However, Government funding is very focussed on new build so may only be able to be done on a small scale; and

- Housing provision should recognise changing trends towards smaller families, single occupants and downsizers, in the form of smaller houses, flats and townhouses.

4.7 Condition of Housing Stock

- Condition of housing stock is a real issue. In particular within the private rental sector there are poor quality homes with poor landlords; and

- As well as creating new homes, need to improve existing stock with selective demolition and renewal.

4.8 Affordability

- Oldham often favoured as it is considered relatively cheap with a large amount of rented stock which can be easier to access than social rented;

- The relative affordability of Oldham properties is an opportunity to attract people when they are being priced out of other areas - many first time buyers may choose to come to Oldham. The issue will be how to retain these people as they want to move up the housing ladder;

- Need different types and tenure of affordable housing, not just social rented accommodation;

- Need to focus on areas where there is a need for affordable housing. Affordable housing tends to be provided in poorer areas where we might actually want more private housing. It is not being delivered in the more expensive areas where people struggle to afford houses in the existing supply;

- Instead of building more affordable housing, improvements can be made to existing stock;

- Balance between viability and gaining affordable housing - the viability get-out clause means it is rare that 7.5% of sales values go towards affordable housing a developers always argue that a scheme is not viable. If viability arguments are allowed to dominate, this drives quality standards too low – and place making is compromised. However, there is concern that if the option to negotiate on viability is taken away, there will be even less residential development in the borough;

- Consideration needs to be given to a spatial requirement for affordable housing as a borough wide requirement will simply result in all the affordable housing going in the usual places; and

- Target should be based on number and type of affordable units

4.9 Housing need groups

- Older persons - demand for downsizing; need to consider planning policy on retirement homes / adaptation of existing properties.

- Young people - need and demand is likely to focus on HMO's, shared dwellings and smaller dwellings; issues around affordability and type of housing; private rented sector will be important; and

- Larger family homes - demand for larger properties, especially from Asian families; need for multi-generational homes; wheelchair accessibility.

4.10 Quality

- Higher quality development on council controlled land is easier to ensure but is more difficult on private land; and

- General consensus that we should expect better quality development across the borough – not accept poorer quality in areas which are seen as less viable.

4.11 Quality of neighbourhood

- The quality of housing areas is often linked to the quality of schools – but need to understand what comes first. Does a good school attract better quality homes, or if we build good homes, will the standards of local schools naturally rise (due to pressure from the parents living in the good homes)?;

- Local Plan needs to focus on improving existing housing supply, including private rented, otherwise the existing supply will fall further into decay and there will be more empty homes; and

- The low value property and condition of some homes compound the need for investment. The need to maintain existing and new supply to a satisfactory standard needs to be articulated clearly within the Local Plan.

4.12 Delivery

- Need to look at delivery models - joint venture vehicles.

4.13 Design

- Homes and Communities Agency very focussed on numbers developed, less interested in design standards;

- Need to higher design standards; developers will respond well if they are given clarity on what is expected of them – and it is made clear that good design doesn't have to be expensive;

- Minimum room size standards required;

- Provision of open space and standards for private garden space as well as on-going maintenance;
- Residential parking standards;
- Lifetime homes and adaptability; and
- Innovative, higher density development around centres with green space incorporated.

Spatial

- Need to have a high quality, high density residential offer in the town centres;
- Need to improve the residential offer within the town centres;
- Quality of our town centres has an effect on where people want to live;
- Need to decide if housing policy should be spatial or based on types of housing required / topic based. Even within relatively self-contained areas with similar characteristics, such as Central Oldham, there is a need for very different types of housing e.g. large, family homes and high density flats; and

  Access to the tram will be an important locational factor - though it is acknowledged that it still takes a relatively long time to get to Manchester City Centre from places like Shaw.

4.14 Loss of green belt

- Prioritising brownfield land over greenfield land;
- Spatial distribution of housing - should this be shared out across the borough?; and
- Need for a range of sites, in a wide spread of locations to provide for different types of housing.

4.15 As part of the preparation of Oldham's Housing Strategy (2019), extensive consultation was carried out at three key stages, beginning in September 2018. The consultation included:

- A housing postal survey sent to 15,000 residents within the borough, which was completed by 2,080 households (12% of the sample);
- A review of existing online survey data;
- Interviews with estate and letting agents;
- Meetings with key stakeholders, including Council Members and Officers from a range of departments, District Executives, Parish Councils, community and voluntary organisations, health and social care representatives, Public Health and Housing Associations;
- Three public consultation events; and
- Focus groups with developers, private landlord forum and housing associations.

4.16 In terms of stakeholder feedback with internal officers, public health colleagues and district partnerships, a summary of issues raised from the initial phase of consultation on housing issues cross the borough, is as follows:

- Lack of rural affordability;
- Developers want higher yield executive accommodation in Saddleworth, which do not meet the needs of the population;
- Younger people prices out of the market in Saddleworth, with the exception of Lees;
- Limited social housing providers in Saddleworth;
- Not enough housing in East and West Oldham to meet needs;
- Overcrowding in East and West Oldham and Chadderton;
- Lots of extensions to properties and retrospective planning permission occurring in East and West Oldham;
- Cheaper and poor quality housing in East and West Oldham- increasing private rented sector, some areas with no sale market due to low values;
- Young people can't afford to buy, and more likely to move away;
- Transient communities;
- Properties with disrepair issues;
- Private renting, lack of responsibility from tenants and landlords - public realm issues e.g. fly tipping; and
- People becoming un-accomodatable due to being evicted from social housing and being moved around private rented accommodation.

4.17 The key issues raised from the public consultation events are as follows:

- Several respondents raised issues with the GMSF, in particular:

    - The use of Green Belt Land for housing development, and the impact of this on health and well-being of residents;
    - The use of 2014 based population projects to provide the demographic baseline for assessment of local housing need as set out by central government;
    - Building on the areas identified in the GMSF will cause devastation to the natural environment; and
    - The Council should be lobbying government for changes to the 2012 Planning Act and HMRC in respect of VAT being levied on brownfield sites and reverse perverse incentives that make building on greenfield land more attractive to developers.

- Respondents felt that the council should do more to work with both private landlords and with investors:

    - To support landlords with the Local Housing Allowance (LHA) tenants falling into arrears. This is impacting on landlord's ability to offer affordable rents;

    - To establish further private and public partnerships;

- To work with private investors wishing to invest in Oldham's housing stock; and
- To buy cheap houses that come on the market from private landlords.

- The scope of the vision particularly in that in welcoming residents from outside of the town some feel that the council should focus more on resolving issues for existing tenants;
- Further to the above, any increase in population should be matched by improvements to the town's infrastructure e.g. health provision, schools, highways; and
- Using the existing housing stock to relieve existing pressures on housing needs, supportive of the 'bringing back into use' initiative, as well as the purchase of properties being sold by private investors.

4.18 All responses to the Housing Strategy consultation are available online at: Oldham Housing Strategy[1].

1 Oldham Housing Strategy documents, available at: https://www.oldham.gov.uk/info/200584/housing_strategies_and_research

5 Further Evidence Required

5.1 The above evidence gives a good baseline of Oldham's current housing position and some of the issues that need to be addressed. However there is further evidence required, which may indicate further land that may be suitable for housing development in the future, including results from Employment Land Review, Open Space Audit and Mill Strategy.

5.2 Site allocations work will also review the existing housing allocations and scope the potential for future allocations as necessary.

6 Key Issues and Opportunities

6.1 A summary of the key issues arising out of the evidence outlined in this topic paper is set out in the following section:

6.2 **Housing supply and delivery:**

- Oldham's LHN of 683 new homes per year is significantly higher than the Local Plan housing requirement of 289 new homes per year, and higher than that of recent average annual completions, which in the past five years have averaged 431 homes a year (net);
- Oldham has delivered 80% of it's housing need over the last three years, as set out in the Government's Housing Delivery Test (HDT) for 2021. As a result Oldham must produce a Housing Delivery Action Plan and identify an additional 20% of housing land on top of the current five-year supply.
- The five-year housing land supply (as at 1 April 2020) contains land to provide 2,103 homes. This represents a three year supply of deliverable housing against the current local housing need of 683 homes a year. Oldham is unable to demonstrate a five-year supply of housing land. It is also not possible to identify an additional 20% of housing land on top of the current five-year supply, as required by the HDT. As such, the presumption in favour of sustainable development currently applies to all planning applications for housing developments;
- There is a lack of available housing and land suitable for future housing development identified to meet Oldham's housing needs over the longer term. The identified future housing land supply (as at 1 April 2020) is 10,955 new homes over the plan period (2020 to 2037). This is less than that required to meet the borough's local housing need.
- The GMSF Publication Plan Draft for Approval October 2020 proposed several strategic allocations in Oldham where land would be released from the Green Belt, or which include areas of Other Protected Open Land (OPOL). Strategic allocations offer the opportunity to provide a further new homes, increasing the total housing land supply and enabling Oldham to meet its housing need. However, it is essential that the other sites in the housing land supply, many of which are on brownfield land, are brought forward too. Many of these brownfield sites have site constraints and issues with viability and deliverability;
- Due to the lack of five-year supply and presumption in favour of sustainable development, development is beginning to come forward on sites which are contrary to the policies within the current Local Plan, such as OPOL and employment sites. The presumption in favour of sustainable development position means we are less able to refuse inappropriate development, and give the full protection required to these sites;
- Work is underway as part of the council's 'Creating a Better Place' agenda to identify a series of residential-led development opportunities as part of repurposing Oldham Town Centre, to deliver around 2,500 new homes on brownfield land, alongside wider improvements to the town centre;
- A Mills Strategy has been commissioned looking at which undesignated mills (mills that are not listed) should be protected and whether they have scope for conversion, taking into account viability and other constraints. The strategy will also identify which undesignated mills are of less importance and where opportunities arise the council may be able to be less protective over these mills,

potentially enabling them to be developed for alternative uses, such as new homes;

- As there is an identified housing shortage, housing should be built at appropriate densities, taking into account location and sustainability, to ensure the most effective use of land;
- There is a lack of large sites identified within the housing land supply, which are more attractive to volume housebuilders, tend to be built out faster and who are generally less susceptible to market changes, making these sites less likely to lapse or stall;
- A large proportion of the housing land supply is made up of small sites which tend to be built out slower, have less of a market for and are often being built by individual builders or small developers, who are more susceptible to market changes and are less financially stable if problems occur. Therefore these sites tend to lapse and stall more frequently than larger schemes;
- The majority of the housing land supply is made up of sites outside the planning system, which means they require a planning application being approved before they can be delivered. This means delivery on these sites is less certain than sites with planning permission, where there is an identified intent to deliver housing on the land;
- There are issues with viability and delivery of some sites within Oldham which need to be addressed to make sites more deliverable for residential development, especially in terms of brownfield sites in low value market areas; and
- There is a lack of suitable serviced plots available within Oldham to meet the need identified on the Self/ Custom Build Register.

6.3 Housing to meet particular needs:

- The Greater Manchester Housing Strategy set out that all new dwellings should comply with nationally described space standards and should be built to 'accessible and adaptable' standard of M2 (2) Building Regulations. The LHNA also suggests that 4% of new dwellings in Oldham are built to M4 (3) wheelchair accessible standard;
- There are imbalances in terms of dwelling size, mix and type across the borough to meet local housing needs, including a need for larger family and adaptable homes;
- Oldham's Housing Offer sets out the council's intention for providing a diverse housing offer that is attractive and meets the needs of different sections of the population at different life stages;
- Oldham has an ageing population, which is set to increase by 35.7% in the age range of 65+ by 2037, placing pressure on existing older people accommodation and requiring new provision is built suitable for older people's needs;
- Welfare reform is increasing the amount of homelessness and people at risk of homelessness in the borough;
- There is an outward migration of young people in the borough, as such there is a need to ensure there is an attractive housing offer available in the borough to retain and attract young people, for example affordable housing and shared housing options;
- There are issues of overcrowding in some of Oldham's neighbourhoods and an increased need for larger inter-generational family housing;
- There are issues of spatial distribution of access to affordable housing, with affordable housing often being concentrated in lower market areas rather than in

higher value areas where there is also a distinct need and issues of rural affordability; and

- A lack of viability often means affordable housing provision is difficult to deliver on some sites. This has implications for place making in terms of inclusive neighbourhoods and sustainability.

6.4 Housing stock:

- Oldham has an ageing housing stock and there are high levels of disrepair, particularly concentrated in areas experiencing deprivation;
- Oldham has the highest proportion of terraced housing in Greater Manchester, which is contributing to overcrowding in some areas; and
- Lower than average levels of home ownership and high amounts of private rented housing are impacting on community cohesion in some areas.

6.5 Large scale development:

- Viability issues and limited funding means delivering large scale infrastructure, required for some large developments, is difficult, can often lead to long determination times and limited contributions to other policy requirements;
- As mentioned above, the housing land supply position means that large development may start coming forward piecemeal, which may impact on the delivery of large scale infrastructure and services as required. This may place further pressure on existing services, infrastructure and facilities in the local area if this is not delivered comprehensively; and
- Open space contributions are increasingly being delivered off-site due to issues with viability and future maintenance, which increases deficiencies in open space provision in some areas and pressure on the council's parks and green space resources for ongoing maintenance of these spaces.

6.6 Policy and Housing Allocations:

- Some of the Local Plan housing policies have less weight due to the five-year housing land supply position and presumption in favour of sustainable development now applying to housing related planning applications;
- The affordable housing policy is difficult to apply. In addition, the threshold has also been superseded by NPPF, which states that all developments of 10 dwellings and above, should contribute to affordable housing;
- The phasing of the housing allocations as set out in the Local Plan no longer applies and there are a number of allocations, especially brownfield allocations, which have not come forward since their identification in the UDP (carried forward to the Local Plan), which may indicate site-specific problems;
- Current housing policies have no targets, no requirements regarding mix, and no allowance for geographical differences. Indications regarding housing needs by district are based on out-of-date evidence.

7 Plan Objectives

7.1 PO1 Building quality homes to meet local housing needs and diversify Oldham's housing offer by:

- providing for, and supporting the delivery of, sufficient new homes to meet the borough's local housing need;
- addressing the local housing needs of the borough including providing for the ageing population, families and disabled persons as well as opportunities for self and custom build;
- providing an appropriate level, and range, of housing tenures to meet local housing need, including affordable housing and the private rented sector, taking into account the need of particular parts of the borough;
- identifying a diverse range of sustainable and accessible sites, from small to large, for new homes across the borough;
- ensuring appropriate densities and making the best and most effective use of brownfield land, including through the use of vacant and underutilised land and buildings;
- ensuring Oldham Town Centre plays a vital role delivering around 2,500 new homes as part of it’s future regeneration; and
- ensuring high quality, sustainable and well-designed new homes are delivered that contribute to creating a better place for Oldham residents.

8 Linkages with other topic areas

8.1 The Housing Topic Paper has links with a number of other topics and policy areas being reviewed as part of the preparation of the Local Plan.

Economy and Employment

8.2 Housing development is an intrinsic part of the economy. Firstly, new housing benefits the manufacturing sector as building materials and supplies are needed for their construction; builders and tradespeople are employed to build and fit out the homes; new infrastructure is required which creates work in engineering and construction and often has benefits for the wider area; developers and housebuilders benefit from the sale of the properties; the real estate sector benefits when conveyancing the new properties; the retail and leisure sector benefit as more people move to an area and spend money at local facilities; and additional council tax revenue can be generated. Development which includes a range of house types and sizes can also attract new workers, bringing a new workforce and skills into the area - or existing workers are retained with the offer of new homes to meet their needs.

8.3 Another link between the two is that there is a need to provide enough land for the identified housing and employment requirements up to 2037. An understanding of the local economy and a review of its locational requirements may identify underused or vacant employment land which may be more appropriate for residential than continued employment use. Conversely, an increase in housing provision in the borough will lead to an increase in the need for local jobs and the need to identify suitable employment sites.

Built Environment

8.4 As part of the Local Plan Review, a Mill's Strategy has been commissioned to deliver a strategy for the sustainable future of the remaining (undesignated) mills across Oldham, which are key components of the identity, culture and heritage of the town. Whilst many of the mills remain in active use, there are a number that have been derelict for a number of years or are underused, which puts them at risk of falling into poor condition and, consequently, could reduce the scope for them to be repurposed in the future. The Strategy will identify which undesignated mills should be protected and whether they have scope for conversion, taking into account viability and other constraints. The strategy will also identify which undesignated mills are of less importance and where opportunities arise the council may be able to be less protective over these mills, potentially enabling them to be developed for alternative uses, such as new homes.

Natural Environment

8.5 The creation of high quality residential environments requires consideration of the natural environment, by ensuring that new housing development creates opportunities for new, or enhanced, Green Infrastructure (GI). This could be achieved through the provision of open spaces within housing development and the use of natural flood risk measures such as sustainable urban drainage and swales. Conversely, new development should seek to reduce negative impacts on biodiversity and create a net gain, for example by avoiding sensitive locations and creating opportunities to incorporate and enhance biodiversity.

8.6 The Greenspace Strategy will include an Open Space Audit which will identify surpluses and deficiencies of open space, sport and recreation provision in the borough compared to local needs. It will also set standards for open space provision and inform policies for new residential development and the protection of open spaces from development.

8.7 The Greenspace Strategy will look wider at the GI network, including how local open spaces can link to the wider GI network and the open countryside beyond. This may provide the opportunity for new residential developments to link to this wider network.

Communities

8.8 Issues covered in the Communities Topic Paper which have a direct relationship to housing include health, well-being and social care; population and demographic changes; education; work and skills; safety and community cohesion; and active travel.

8.9 These will all have to be taken into account when considering the provision of new housing and developing policies to meet housing requirements. This is both in terms of the number and type of homes required to meet the needs of different sectors of the population and in creating a good quality environment within which new homes are located, with the services and facilities that are needed. This includes meeting the demand for new school, health care and other community facilities created by an increase in new homes in an area.

Open Land

8.10 The Housing topic paper also links to issues discussed through the Open Land topic paper, which covers Green Belt and the Other Protected Open Land (OPOL) designation. Oldham needs to provide enough land to meet housing requirements up to 2037 and Oldham's supply of brownfield sites will make a significant contribution to the land supply. However, it is clear that the available brownfield sites will not make up the full land supply required and there will be a need to release land from the existing Green Belt and OPOL, as identified within the GMSF Publication Plan for Draft Approval October 2020.

Town Centres

8.11 There is an increasing emphasis on the role of residential development within town centres, including as part of the Creating a Better Place agenda, as a means of complementing the retail and leisure offer, boosting the vitality of centres and providing a valuable source of brownfield housing land in areas which are highly accessible by public transport. Again, there will be a need to balance the promotion of town centre living against the protection of the traditional functions of these areas.

Climate Change, Energy and Flood Risk

8.12 To achieve high quality housing in places where people want to live there is a need to ensure that housing development manages and adapts to flood risk and climate change pressures. For housing, this may include consideration of location, layout, building orientation, massing, landscaping and design to minimise energy consumption.

9 Integrated Assessment

9.1 The Local Plan will be supported by an Integrated Assessment (IA). The IA will include the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA) and a Health Impact Assessment (HIA). The Habitats Regulations Assessment (HRA) will be a standalone document; however its findings will be integrated into the IA.

9.2 The role of an IA is to promote sustainable development through assessing the emerging Local Plan against economic, environmental and social objectives. It is a way of ensuring that the preferred approach in the Plan is the most appropriate when assessed against any reasonable alternatives. It also allows for any potential adverse effects to be identified and mitigated and for improvements to environmental, social and economic conditions to be made.

9.3 The Scoping Report is the first stage of the IA process (Stage A). It identifies the scope and level of detail to be included in the IA report. The IA identified the following issues to be addressed in the Local Plan in relation to housing:

- To provide a sustainable housing land supply and an appropriate mix of sizes, types and tenures to meet local housing needs;
- To ensure land and buildings are used in an effective and efficient manner, maximising the use of brownfield land.

9.4 The IA proposed an Integrated Assessment approach and scoring system to the assessment of the emerging Local Plan.

9.5 Consultation on the Integrated Assessment Scoping Report took place between 10 July and 21 August 2017.

9.6 The IA will help to develop and refine the options of the Local Plan as work progresses and assess the effects of the Local Plan proposals and consider ways of mitigating adverse effects and maximising beneficial effects. An IA report will be published alongside each Draft Local Plan published for consultation before the final Publication stage.

9.7 This Local Plan Issues and Options IA report has appraised the proposed vision, plan objectives and spatial options. The outcomes from the Issues and Options IA with relevance to the housing theme are set out below.

9.8 The Vision scored a mixture of neutral, positives and significantly positive scores. Overall no particular changes were recommended for housing elements of the vision.

9.9 The need to ensure that IA Objective 'To ensure land and buildings are used in an effective and efficient manner, maximising the use of brownfield land' is met through the site selection process and policies;

9.10 With regards to Plan Objective 1 (Building quality homes to meet the local need and diversify the housing offer) this scored a mixture of neutral, positives, significantly positive and uncertain scores. It has scored an uncertainty as the plan objective has been screened in by the HRA and must be subject to further screening as the Local Plan is developed. No mitigation / enhancements were identified in relation to Plan Objective 1 that needed to be fed into the Issues and Options.

9.11 The IA also considered the spatial options identified in the Local Plan Issues and Options and regarding those relating to the housing theme found that:

- The appraisal on the affordable housing spatial options showed that Option B (targeted approach to affordable housing) results in more positive outcomes overall than Option A (boroughwide approach).
- The IA appraisal for HMO Spatial Options A and B both scored the same.

10 Evidence Sources

10.1 National Planning Policy Framework (MHCLG, 2019)

1. National Planning Policy Framework

10.2 Planning Practice Guidance (MHCLG, as per last update)

1. Brownfield land registers planning practice guidance, available at: https://www.gov.uk/guidance/brownfield-land-registers
2. Build to rent planning practice guidance, available at: https://www.gov.uk/guidance/build-to-rent
3. Design planning practice guidance, available at: https://www.gov.uk/guidance/design
4. Health and wellbeing planning practice guidance, available at: https://www.gov.uk/guidance/health-and-wellbeing
5. Housing need assessment planning practice guidance, available at: https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments
6. Housing and economic land availability assessment planning practice guidance, available at: https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment
7. Housing: optional technical standards planning practice guidance, available at: https://www.gov.uk/guidance/housing-optional-technical-standards
8. Neighbourhood planning planning planning practice guidance, available at: https://www.gov.uk/guidance/neighbourhood-planning--2
9. Self-build and custom housebuilding planning practice guidance, available at:https://www.gov.uk/guidance/self-build-and-custom-housebuilding
10. First Homes planning practice guidance, available at: https://www.gov.uk/guidance/first-homes
11. Viability planning practice guidance, available at: https://www.gov.uk/guidance/viability

10.3 Other planning policies

1. Housing Delivery Test measurement rule book (MHCLG, 2018) available at: https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book
2. Planning policy for traveller sites (MHCLG, 2012) available at: https://www.gov.uk/government/publications/planning-policy-for-traveller-sites

10.4 Planning for the Future white paper (MHCLG, 2020) and supporting documents: https://www.gov.uk/government/consultations/planning-for-the-future

10.5 Housing white paper (MHCLG, 2017) and supporting documents: https://www.gov.uk/government/collections/housing-white-paper

10.6 Oldham Local Plan (Oldham Council, 2011) and related documents: https://www.oldham.gov.uk/info/200709/documents_in_the_local_plan

10.7 Oldham Council Corporate Plan 2017-2020 (Oldham Council, 2017): https://www.oldham.gov.uk/downloads/download/1173/corporate_plan_2017%E2%80%932020

10.8 Oldham Council Housing webpages (including link to Housing Strategy (Oldham Council, 2019)): https://www.oldham.gov.uk/info/100007/housing

10.9 The Oldham Plan 2017-2022: http://www.oldhampartnership.org.uk/the-oldham-plan/

10.10 Greater Manchester Spatial Framework (GMSF): https://www.greatermanchester-ca.gov.uk/GMSF

10.11 Greater Manchester Strategy: https://www.greatermanchester-ca.gov.uk/ourpeopleourplace

10.12 Greater Manchester Housing Strategy: https://www.greatermanchester-ca.gov.uk/media/2165/16a_gm_housing_strategy_final.pdf

11 Appendix One: Glossary

Affordable Housing - Affordable Housing is defined in the NPPF as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

1. Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent(50), or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent);
2. Starter homes(51): is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used;
3. Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households; and
4. d. Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

Community Right to Build Order - An Order made by the Local Planning Authority (under the Town and Country Planning Act 1990) that grants planning permission for a site specific development proposal or classes of development.

Deliverable - As per the NPPF definition, 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. In particular:

1. sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be

delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

2. where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Greenfield Land - Land which has not been previously developed. It can include land which used to have built development on it but where little development remains; land where the development on it is limited by a planning condition which requires the land to be restored to its original pre-development condition when it's useful life ends (i.e. a quarry); and land where development has been used for forestry or agriculture and that development is no longer needed for that purpose.

Housing Delivery Test (HDT) - Measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Housing Delivery Test Measurement is published annually by the Ministry of Housing, Communities and Local Government.

Local Housing Need - The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 NPPF).

Planning Obligation – An agreement made between the council and another party that concerns a particular aspect of, or is associated with, a development. It is usually made in connection with the granting of planning permission through Section 106 of the Town and Country Planning Act 1990.

Previously Developed Land (often referred to as brownfield land) - Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Self-build and custom-build housing - Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Strategic Housing Land Availability Assessment (SHLAA) - Assessments carried out by local authorities which support the delivery of sufficient land for housing to meet the community's need for more homes. These assessments are required by national planning policy.