Oldham's Housing Delivery Action Plan: Part Two

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1 Introduction

1.1 Purpose of the Report

- 1.1.1 Part 1 of the Action Plan sets out the context, evidence and root causes for housing under-delivery within Oldham.
- 1.1.2 Part 2 sets out the individual actions identified by the council to improve delivery and ensure that we provide a diverse Oldham Housing Offer that is attractive and meets the needs of different sections of the population at different stages of their lives.
- 1.1.3 An Action Plan is intended to be a practical document, focused on effective measures aimed at improving delivery underpinned by local evidence and research of key issues. It is a live document, reviewed and updated as appropriate.
- 1.1.4 This is Oldham Council's third Action Plan, drawn up in response to the Housing Delivery Test 2021 results published in January 2022.

2 Summary of root cause analysis, housing delivery and supply issues

2.1 Key issues

- 2.1.1 Analysis of housing delivery and the make-up of the housing land supply identifies a number of issues, which together contribute towards under-delivery within the borough. In summary, these are:
 - The increase in housing requirement to 677 homes a year¹ is a significant increase on our requirement set out in the Local Plan (289 homes a year) and will require a step change in housing delivery and supply.
 - There is a need to continue 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.
 - The scale of development coming forward minor sites (of less than 10 dwellings) make up 68% of sites granted planning permission in the last eleven years. Whilst the number of major sites coming forward is relatively low, they continue to form a significant proportion of the supply, accounting for 77% of dwellings granted permission over the last eleven 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 2021) has identified additional 'large-scale major' sites (over 200 dwellings).
 - Number of major sites of 10 to 49 dwellings 115
 - Number of major sites of 50 to 199 dwellings 55
 - Number of large-scale major sites of 200+ dwellings 10
 - 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.

¹ The housing requirement that applied for the Housing Delivery Test 2021, as per the standard methodology.

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- 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 2021) made up of potential housing sites that do not currently have any planning status.
- Issues around the implementation of planning permissions which may, for example, be due to viability and delivery.

3 Housing Delivery Action Plan

3.1 Structure of the Action Plan

- 3.1.1 Oldham Council and its partners have had many successes over the last few years that have helped improve housing in Oldham, as identified in the Council's Housing Strategy.
- 3.1.2 Reflecting on the housing delivery analysis identified in Part 1 Housing Delivery Context, Evidence and Root Cause Analysis, the actions aimed at increasing delivery across the borough and set out below are structured around the following themes:
 - Improving capacity and processes.
 - Increasing the delivery of sites within our housing land supply, in particular on brownfield land.
 - Delivery of the council's ambitions to improve and increase the housing offer within Oldham.
- 3.1.3 The responsible lead for all actions is the Director of Economy.

3.2 Improving capacity and processes

Action required	Task description	Expected outcomes	Progress update
Continue and improve member training as appropriate.	Continue to provide annual training to Planning Committee members with interim updates as required.	Better understanding of the role and process of the Planning Committee.	Ongoing. Member training is carried out annually.
	Ensure ward members clearly understand the expectations, and role, of the Planning Committee (for example through the use of newsletters providing updates regarding changes to legislation and	Better understanding of the role and process of the Planning Committee.	On-going

Action required	Task description	Expected outcomes	Progress update
	policy as appropriate).	outcomes	
	Review process in consultation with members as appropriate for delegating planning applications and member call-ins. Including a review of the Planning Scheme of Delegation.	No more than 5% of planning applications are determined by Planning Committee.	Complete - Planning Scheme of Delegation revised in 2020.
Improve officer and member knowledge and understanding of viability.	Improve officer and member knowledge and understanding of viability, particularly in relation to the delivery of strategic housing sites.	A better understanding of viability issues and constraints.	Partly complete - Officer training was carried out in April 2020. On-going
Review and improve residential planning application processes	Introduce a pre- application advice service that incorporates a 'one team approach to ensure more effective communication and consistent messaging regarding planning priorities and requirements.	Better communication between council departments and provision of consistent advice to prospective developers.	Complete - Pre-application service now in place.
	Continue the dialogue with developers and registered providers through the Oldham Housing Board (proposed as part of the Housing	A wider understanding of issues regarding housing delivery and more effective implementation and monitoring of the	On-going

Action required	Task description	Expected outcomes	Progress update
	Strategy) and holding six-monthly developer forums as appropriate.	Housing Delivery Action Plan.	
	Improve the efficient execution of S106 agreements.	Reducing the time taken to secure agreements and increasing the monitoring of those that are in place.	On-going Infrastructure Funding Statement is incorporated into the authorities Monitoring Report providing information on S106 agreements secured and monies spent.
	Review planning obligations and priorities to provide clarity regarding planning requirements.	Greater understanding regarding council priorities and clarification (for developers) regarding the council's expectations.	To be actioned
	Introduce the use of Planning Performance Agreements (PPA's) for largerscale developments and more complex housing sites.	Agreement on realistic determination timescales and increase in the number of PPA's.	Complete - PPA's introduced as part of the pre-application service.

3.3 Increasing delivery of sites within the housing land supply, in particular on brownfield sites

Action required	Task description	Expected outcomes	Progress update
Identify deliverable and viable housing	Review the housing land	An action plan setting out how	On-going
sites across the	supply (including	'priority' sites will	As part of the
borough and	lapsed and stalled		council's Creating

Action required	Task description	Expected	Progress update
		outcomes	D (1) D:
support their delivery, with a focus on brownfield land.	sites) and identify 'priority' sites and prepare a supporting delivery plan to set out how these will be brought forward, and their delivery reviewed.	be delivered. The action plan will be reviewed and updated regularly to demonstrate how the council, and its partners, are facilitating the delivery of housing.	a Better Places regeneration programme priority sites have been identified in the Oldham Town Centre Framework and the council's Housing Delivery Strategy ² . The Strategy sets out a series of recommendations for the council to drive forward a programme of housing development activity and unlock brownfield sites.
			identified as part of this Action Plan (Appendix 1).
	Prepare planning briefs for 'priority' sites where appropriate, providing clear direction regarding policy framework, requirements and expectations (including obligations and standards).	Preparation of planning briefs for 'priority' sites where appropriate.	On-going Will follow on from the Residential Delivery Strategy and priority sites work as appropriate.
	Identify suitable opportunities for the delivery of larger scale 'major'	Identification of opportunities for the delivery of larger scale 'major'	On-going As per HDT analysis, the
	sites within the urban area,	sites in the urban area.	number of 100/200+ homes

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² https://committees.oldham.gov.uk/ieDecisionDetails.aspx?ID=4401

Action required	Task description	Expected outcomes	Progress update
	capable of providing 100/200+ dwellings through future SHLAA reviews and identify mechanisms to facilitate their delivery.		sites in the housing land supply has increased. In particular, there are a number within Oldham Town Centre, forming part of the town centre framework and Creating a Better Place agenda which will facilitate their delivery, alongside the council's Residential Delivery Strategy.
	Review and improve the Brownfield Register to facilitate delivery of brownfield land.	Increased delivery of housing sites on brownfield land.	Brownfield Register reviewed and amended as per updated regulations (latest published December 2021).
	Review and improve constraints information available to facilitate delivery of brownfield land, such as the use of the Brownfield Site Risk Calculator.	Increased delivery of housing sites on brownfield land.	To be actioned
	Continue to enable members of the public to put forward suitable, achievable and available sites for housing delivery for consideration as part of future SHLAA	Members of the public can put forward a suitable, achievable and available site for housing delivery as part of an open Call for Sites that will feed into	On-going Sites can be put forward to the council for consideration as part of the annual Strategic Housing Land Availability

Action required	Task description	Expected outcomes	Progress update
	reviews.	SHLAA updates as appropriate.	Assessment (SHLAA) update.
	Identify opportunities to package suitable sites together and explore and maximise funding opportunities to bring 'priority' sites forward	Delivery of residential development on priority sites that would otherwise not be developed.	On-going Linked to the preparation of the council's Residential Delivery Strategy.
Identifying opportunities for the re-use of vacant buildings to deliver new homes.	Improve collection of information on vacant buildings to identify those that may have the potential for re-use as residential. Align with business rates and Empty Homes Strategy.	Identification of vacant buildings with the potential for re-use as residential as part of the housing land supply.	On-going The council's Mill Strategy identifies opportunities for repurposing mills for homes and has helped to inform the preparation of the borough's housing land supply.
Small site development	Explore opportunities for facilitating and supporting the delivery of self- build and community-build through providing guidance on how to bring forward those sites	Increase delivery of self-building and community build housing.	On-going Will be considered as part of the Local Plan review.

3.4 Delivery of the council's ambition to improve and increase the housing offer within Oldham

Action required	Task description	Expected outcomes	Progress update
Support the implementation of the Housing Strategy	Implementation of the council's Housing Strategy 2019 Delivery Plan.	Delivery of Housing Strategy 2019 ambitions and outcomes.	On-going

Action required	Task description	Expected	Progress update
		outcomes	
	Planning officers to contribute towards the preparation of 'Place Plans' and 'Housing Insights', identified in the council's Housing Strategy, to inform the Local Plan process.	Place Plans and Housing Insights are in place as appropriate.	On-going Housing insights are being prepared as part of the evidence base for the Local Plan review.
Support the implementation of the Oldham Town Centre Vision Framework	Support implementation of the Oldham Town Centre Vision Framework as part of the 'Creating a Better Place' agenda, including the focus on residential development with the delivery of around 2,500 new homes.	Delivery of the Oldham Town Centre Vision Framework and residential development to meet local housing needs and deliver future housing growth.	On-going Sites with potential for new homes identified as part of the Oldham Town Centre Vision Framework has been included in the housing land supply as appropriate. Will be considered as part of the Local Plan review.
Support the implementation of the Local Plan and other local planning documents.	Support and input into the delivery of Places for Everyone Joint DPD.	Adoption of Places for Everyone Joint DPD.	On-going The examination of PfE is underway following its submission to the Secretary of State in February 2022.
	Progress review of Local Plan.	Progression to next stage of Local Plan review (Draft Plan).	On-going Further stages and the timetable for the Local Plan as a whole will be set out in a revised Local Development Scheme.

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Action required	Task description	Expected outcomes	Progress update
	Preparation of the Oldham Code setting out guidance regarding planning requirements and standards relating to new housing development.	Clarity regarding planning policy requirements.	On-going Oldham Code to be developed as part of Local Plan review.

4 Priority Sites

4.1 Identifying priority sites

4.1.1 In order to support the delivery of housing within the borough, priority sites have been identified. These sites will aim to diversify the housing offer within the borough and will be supported through to delivery by a toolkit developed by the council which will include assisting in site viability, planning application stage and on-site delivery. The sites have been identified through the SHLAA as at April 2021, in consultation with colleagues in Regeneration and Housing Strategy whilst having regard to the council's priorities. Sites will be updated where necessary as part of the next SHLAA review (as at 1 April 2022) and will continue to inform future updates of the Housing Delivery Action Plan.

4.2 Supporting site viability

- 4.2.1 In order to assist in site viability, research will be carried out on these sites which will include presenting brownfield remediation costs upfront to guide developers. Using the Brownfield Ground Risk Calculator(1), which has been developed for Greater Manchester, data will be presented for each site that can help to identify build-out costs and remediation requirements. The intention is that this will enable early discussions with the council regarding funding support, inform the planning application process and ultimately speed up site delivery. This will also support SME developers by assisting in the site investigation stage, providing a baseline for further work.
- 4.2.2 Delivery on a number of these sites is already being supported through the 'Creating a Better Place' framework and the Residential Delivery Strategy (as indicated in the table below). The remaining sites will be promoted to form part of future funding programmes as appropriate, including the Greater Manchester Housing Fund and potential local housing funds. These sites could also be promoted for delivery through a Local Housing Company.
- 4.2.3 In order to help the delivery of these sites, which differ greatly in terms of viability, housing offer and location, sites could be packaged whereby less viable sites are packaged with more viable sites to ensure delivery of both is achieved. Packages of sites will be identified.

4.3 Supporting the planning application process

4.3.1 To support the delivery of these sites through the planning application process, planning briefs may be produced where appropriate. The briefs would provide a clear direction regarding policy framework, requirements and expectations (including planning obligations and standards). This would enable a more efficient and transparent process for developers to bring these sites forward, whereby council expectations and planning requirements are clear from the beginning of the planning process. The briefs would inform pre-application discussions and enable a more efficient application process.

4.4 Site delivery plans

- 4.4.1 A delivery plan may be produced for some priority sites, to ensure key stages in the delivery of these sites are met efficiently and are supported by the council where appropriate, such as site promotion, pre-application member/ public consultation etc.
- 4.4.2 The timeline for the delivery of these sites is identified indicatively within the SHLAA. This sets out an indicative time period for when it is expected that these sites will be delivered and is reviewed annually.
- 4.4.3 The characteristics of each site will determine the extent of support required to deliver the sites, for example, some of the large-scale town centre sites will require longer-term support due to the scale and wider regeneration required to facilitate delivery, whilst some of the less strategic sites may be delivered quickly and with less support required from the council. The timeline for delivery would be set out within the site's delivery plan.

4.5 Priority sites

- 4.5.1 Four categories of sites have been identified, based on several criteria. These are set out below.
- 4.5.2 Priority 1 Sites key sites in a strategic location which form part of a development framework/ wider regeneration initiatives. These sites are:
 - Council-owned this may facilitate delivery of the sites and provide greater autonomy over the development of these key sites;
 - Identified within a council framework or vision this provides evidence to support the delivery of sites and ensures they are delivered in conjunction with strategic priorities;
 - Located within Oldham Town Centre identified as a highly sustainable location and central to the 'Creating a Better Place' framework.
- 4.5.3 Priority 2 Sites large-scale council-owned sites in other locations across the borough. These sites are:
 - Council-owned (in the majority) this may facilitate delivery of the sites and provide greater autonomy over the development of these key sites; and
 - Large-scale capable of delivering over 50 dwellings. Providing the opportunity for development of a scale which could also support wider initiatives such as providing green infrastructure and a diverse housing offer, including affordable housing.
- 4.5.4 Priority 3 Sites large-scale sites in private ownership. These sites are:

- Large-scale capable of delivering at least 50 dwellings. Providing the opportunity for development of a scale which could also support wider initiatives such as providing green infrastructure and a diverse housing offer, including affordable housing;
- Currently vacant/ mostly vacant bringing forward vacant land or reusing vacant buildings is important to ensure the development of brownfield land; and
- Forms part of the medium-term housing land supply as identified in the SHLAA – the medium-term supply contains the largest proportion of housing land within the supply. These years may also be subject to an increase in housing need (should a stepped housing requirement be introduced). As such it is important that these sites are delivered efficiently.
- 4.5.5 Priority 4 Sites small to medium-scale council-owned sites. These sites are:
 - Council-owned (in the majority) this may facilitate delivery of the sites and provide greater autonomy over the development of these key sites; and
 - Medium-scale capable of delivering at least 10 dwellings. These sites still provide the opportunity to deliver housing and other priorities and may also be suitable for SME developers.
- 4.5.6 In total the priority sites have the opportunity to provide around 4,066 homes (37% of the total Housing Land Supply, identified in the SHLAA as at 1 April 2021). The sites identified in each category are set out in Appendix 1.

5 Implementation and monitoring

- 5.1.1 The Action Plan will be reviewed and updated on an annual basis.
- 5.1.2 Monitoring and governance arrangements regarding the implementation of the Action Plan will need to be aligned with the council's monitoring report (AMR) and recently adopted Housing Strategy.

6 Appendix

6.1 Priority Sites

Site details are based on the most recently published SHLAA (as at 1 April 2021) and as such are indicative and subject to change as part of future updates. Where possible, updates since the publication of the SHLAA (as at 1 April 2021) have been reflected in the list below.

Status	Ward	SHLAA Site Ref	Site Name	Land Type	Area (ha)	Density	Capacity	Dwellings Years 0-5	Dwellings Years 6 to 10	Dwellings Years 11 +	Priority Site Category	Identifie d in the Oldham Housing Delivery Program me
POT	СО	SHA2000	Civic Centre, West Street	BF	2.12	283.0	480	0	186	294	1	Y
POT	СО	SHA1314	Mecca Bingo Block, Cnr Union St, King St, Oldham	BF	1.77	194.2	275	0	0	275	1	
POT	CO	SHA1998	Tommyfield Market	BF	1.13	269.9	244	0	186	58	1	Υ
РОТ	SM	SHA1759	Former Leisure Centre site, Lord Street	BF	1.5	154.2	185	0	85	100	1	Y
POT	SM	SHA2002	Bradshaw Street	BF	1.27	172.2	175	0	175	0	1	
РОТ	СО	SHA2001	Police HQ, Barn Street	BF	0.6	343.8	165	0	165	0	1	
POT	SM	SHA2016	Southlink - land at	BF	5.76	94	237	0	237	0	1	Υ
POT	MV	SHA0845	Hill Farm Close,	BF	6.64	56.9	302	237	65	0	2	

Status	Ward	SHLAA Site Ref	Site Name	Land Type	Area (ha)	Density	Capacity	Dwellings Years 0-5	Dwellings Years 6 to 10	Dwellings Years 11 +	Priority Site Category	Identifie d in the Oldham Housing Delivery Program me
			Fitton Hill									
РОТ	FE	SHA1029	Kaskenmoor School, Roman Rd, Failsworth	Mix	5.15	30	151	75	76	0	2	Y
POT	MV	SHA1384	Former CPD Centre and Marland Fold School, Rosary Road	BF	2.26	37.3	63	63	0	0	2	
POT	НО	SHA1033	Higher Lime Recreation Ground, Limeside	GF	3.99	35.7	110	110	0	0	2	Υ
POT	SS	SHA1162	Saddleworth School, Uppermill	Mix	4.40	36.3	97	0	97	0	2	Υ
POT	SJ	SHA0899	London Road, Derker	BF	1.31	43.5	57	57	0	0	2	Υ
POT	cs	SHA0976	South Chadderton Sch, Butterworth Lane, Chadderton	Mix	5.1	48.2	175	100	75	0	2	Υ
UDP2	НО	HLA0178	Land at Lower Lime Road	GF	2.59	30.1	78	0	78	0	2	

Status	Ward	SHLAA Site Ref	Site Name	Land Type	Area (ha)	Density	Capacity	Dwellings Years 0-5	Dwellings Years 6 to 10	Dwellings Years 11 +	Priority Site Category	Identifie d in the Oldham Housing Delivery Program me
POT	СО	SHA2130/ HLA3860	Land at Vale Drive/ former Crossbank House	MIX	0.69	127.5	88	88	0	0	2/3	
POT	SH	SHA2131	Shop Direct Site, Linney Lane	BF	12.4	40.2	400	0	400	0	3	
РОТ	SH	SHA0905	Duke Mill, Refuge St, Shaw	BF	1.54	69.8	86	0	86	0	3	
POT	RS	SHA1004	Park Lane, Royton	BF	1.28	49.8	51	0	51	0	3	
POT	AL	SHA0893	Warren Lane, Oldham	GF	1.8	34.7	50	0	50	0	3	
UDP1	WE	HLA2663	Land at North Werneth Zone 6 (Hartford Mill, Edward St)	BF	2.7	58.5	158	0	158	0	3	
UDP1	SN	HLA2088	Bailey Mill, Delph	BF	0.86	58.1	50	0	50	0	3	
UDP1	WA	HLA2353	Huddersfield Road/Dunkerley Street, Oldham	BF	2.61	19.2	50	0	50	0	3	
			Land at North Werneth Zone 5, Land bounded by Hartford Mill to the									

Status	Ward	SHLAA Site Ref	Site Name	Land Type	Area (ha)	Density	Capacity	Dwellings Years 0-5	Dwellings Years 6 to 10	Dwellings Years 11 +	Priority Site Category	Identifie d in the Oldham Housing Delivery Program me
Other	WE	HLA2662	west, Edward Street to the north, and Milne Street to the east	BF	1.39	52	72	0	72	0	3	
Other	SJ	HLA2664	Land at Derker (Abbotsford Road Site), Abbotsford Road/Vulcan Street, Derker, Oldham	BF	1.18	39.8	47	47	0	0	4	Υ
РОТ	RS	SHA1080	Our Lady's RC High School, Roman Rd, Royton	BF	1.43	35	40	0	40	0	4	
POT	AL	SHA0895	Land between CherryAvenue and Furness Avenue	Mix	4.70	9	35	0	20	15	4	
POT	SJ	SHA1630	Former Cromford Mill Site, Oldham	Mix	0.57	49.1	28	28	0	0	4	Y
РОТ	CS	SHA0040	Land at former Broadway House/Library, Broadway	Mix	0.72	46.5	20	0	20	0	4	Y

Status	Ward	SHLAA Site Ref	Site Name	Land Type	Area (ha)	Density	Capacity	Dwellings Years 0-5	Dwellings Years 6 to 10	Dwellings Years 11 +	Priority Site Category	Identifie d in the Oldham Housing Delivery Program me
РОТ	AL	SHA0065	Lake View / Park View, King Rd, Oldham	Mix	0.67	50	27	0	27	0	4	
РОТ	со	SHA1002	Land at jct Belmont and Franklin Sts, Oldham	BF	0.59	51	24	0	0	24	4	
POT	SH	SHA0173	East of Milnrow Road, Shaw	Mix	0.52	50	21	0	21	0	4	
Other	SN	HLA3147	Land at, Ward Lane, Diggle	GF	0.4	25	10	10	0	0	4	Υ
UDP1	RS	HLA2452	Blackshaw Lane, Royton	BF	0.5	30	15	5	10	0	4	Υ

Priority Sites Update

Several sites have received planning permission since the publication of the SHLAA as at 1 April 2021. However, these sites remain in the priority sites list until they are under construction. These are:

- SHA0845 Hill Farm Close, Fitton Hill;
- SHA1384 Former CPD Centre and Marland Fold School, Rosary Road; and
- SHA2130/ HLA3860 Land at Vale Drive/ former Crossbank House;

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One site – SHA2131 Shop Direct, Linney Lane - has been added to the priority sites list as a category three site due to its significant capacity (400 homes) and its identification in the SHLAA as being deliverable in the medium term. Since the publication of the SHLAA as at 1 April 2021, the site has received outline planning permission for residential development of 400 homes.

Two sites which were identified as priority sites in the previous Housing Delivery Action Plan have gained planning permission and are now under construction for residential development. As such they have been removed from the above list but remain part of the identified housing land supply. These are:

- SHA1606 Maple Mill, Cardwell Street which was identified as a category three priority site. This site is now under construction for 98 affordable homes; and
- SHA1026 Vernon Works (Fir Mill), Highbarn Rd, Royton which was identified as a category three priority site. This site is now under construction for 99 homes (50% of which are for affordable housing).

A number of sites have also been removed from the list of priority sites for various reasons. These are:

- SHA2032 Sellers Business Park site no longer considered deliverable within the medium term and therefore does
 not meet the criteria for inclusion within category three of the priority sites. The site remains part of the identified
 housing land supply, considered deliverable in the long term.
- SHA2064 Land between Burnley Lane and Chadderton Way (PEZ 12 Fernhurst Mill) since the publication of the SHLAA as at 1 April 2021 the has been redeveloped for non-residential uses. The site is no longer included in the housing land supply.
- HLA2831 53 55 King Street (formerly Riley Snooker Club and Megson and Ponsonby Solicitors), Oldham, OL8 1EU site no longer considered deliverable within the medium term and therefore does not meet the criteria for inclusion within category three of the priority sites. The site remains part of the identified housing land supply, considered deliverable in the long term.
- HLA3120 Phoenix Mill, Cheetham Street, Failsworth, M35 9DS site no longer considered deliverable within the medium term and therefore does not meet the criteria for inclusion within category three of the priority sites. The site remains part of the identified housing land supply, considered deliverable in the long term.