

# Oldham

# Local Plan

**Draft Local Plan: Homes Topic Paper**

**December 2023**



**Oldham**  
Council

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## 1. Introduction and Purpose

- 1.1. This is the Housing Topic Paper and is one of ten topic papers produced to inform the consultation on the Oldham Local Plan: Draft Plan.
- 1.2. All of the papers can be found on the [Oldham Council website](#)<sup>1</sup>.
- 1.3. The topic papers set out how the preferred option for each policy under the relevant Draft Local Plan 'Chapter' has been developed. As such, the topic papers support and complement the Draft Plan consultation document as they provide a detailed explanation of the basis for each preferred policy approach. The policies are presented in a consistent format in each paper with information to provide a comprehensive appreciation of the background to, and development of, the preferred option.
- 1.4. The topic papers set out the national, regional and local planning context and then for each policy, or group of policies where relevant, the topic paper details how comments received to the Issues and Options consultation and relevant evidence have helped to shape the proposed policy approach. Including how this has been informed by the findings of the Integrated Assessment. There are also details of further work that may be required to inform the next stage of the plan-making process – the Regulation 19 Publication Plan.
- 1.5. The preparation of a Local Plan must be informed by consultation and engagement as well as statutory processes, such as Integrated assessment and Habitats Regulations Assessment, and address the requirements of national planning policy. These important elements of plan-making have, therefore, informed development of the Draft Local Plan and helped to shape the proposed policy approach. These supporting documents are available to view on the [Oldham Council website](#).

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<sup>1</sup> Available at: [https://www.oldham.gov.uk/info/201233/local\\_plan\\_review/3095/draft\\_local\\_plan](https://www.oldham.gov.uk/info/201233/local_plan_review/3095/draft_local_plan)

## 2. National Context

- 2.1. This section sets out the key national planning policies that relate to housing and which have informed the policy approach taken. It also looks at the regional context – in the main this is the Places for Everyone Joint Development Plan, however there may be other policies and programme of relevance, and local policies and programmes in particular how the policy or policies will help to Create a Better Place.

### **National Planning Policy Framework (NPPF)**

- 2.2. 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'.
- 2.3. 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 plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and 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 the 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'.
- 2.4. Paragraphs 20 to 23, states that strategic policies should set out an overall strategy for the pattern, scale and quality of development making sufficient provision for housing (including affordable housing) and employment development. Strategic policies should also provide a clear strategy for bringing sufficient land forward, this should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.
- 2.5. Chapter 5 (Delivering a sufficient supply of homes) sets out the requirements regarding boosting the supply of homes. The key elements are as follows:
- a) Paragraph 61 states that strategic policies should be based upon a local housing need assessment, conducted using the standard method set out in national planning guidance.
  - b) Paragraph 63 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.

c) Paragraphs 64 to 66 set 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, custom build or community-led homes or is exclusively for affordable housing.

2.6. Paragraphs 67 to 68 set 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 significant change in circumstances that would affect the figures.

2.7. Paragraphs 69 to 70 set 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). The purpose of a SHLAA is to consider the availability, suitability and likely economic viability of sites and use this information to inform planning policies which identify a sufficient supply and mix of housing sites. Paragraphs 6.37 to 6.51 of this topic paper outlines the council's SHLAA in more detail.

2.8. Paragraphs 75 to 79 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 for decision making

purposes if their adopted plan is more than five years old or more (unless they have been reviewed and found not to need updating); and

- In all other circumstances local planning authorities should identify and update annually a supply of deliverable sites sufficient to provide either a minimum of five years' worth of housing, or a minimum of four years' worth of housing if the provisions in paragraph 226 apply (emerging plans). The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old (calculated using the standard methodology). Where there has been significant under delivery of housing (measured by the Housing Delivery Test) over the previous three years, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period).

2.9. Chapter 11 sets out the requirements relating to 'making effective use of land' such as:

- 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
- 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.

2.10. Paragraphs 128 and 129 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.

- 2.11. Paragraph 130 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.
- 2.12. 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.
  - Chapter 12 sets out policy for achieving well designed places and is clear at paragraph 135(f) that planning policies and decisions should ensure that developments create places that are inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. Footnote 52 of the NPPF clarifies that planning policies may make use of the nationally described space standard.
  - 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**

### **Build to rent (2018)**

- 2.13. 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.
- 2.14. 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).
- 2.15. 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)**

- 2.16. The guidance sets out the Government's preferred affordable housing scheme - 'First Homes'<sup>2</sup>. 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.
- 2.17. First Homes are a type of intermediate tenure affordable housing<sup>3</sup>. First Homes

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<sup>2</sup>First Homes Planning Practice Guidance: <https://www.gov.uk/guidance/first-homes>

<sup>3</sup> As defined in NPPF Annex 2 – Glossary.

must be discounted by a minimum of 30% against the market value and after the discount has been applied, the first sale must be at price no higher than £250,000 (or £420,000 in Greater London).

2.18. First Homes must be sold to a person who meets the eligibility criteria, which includes that:

- A purchaser of a First Home should be a first-time buyer as defined in paragraph 6 of schedule 6ZA of the Finance Act 2003;
- 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; and
- 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.

2.19. These national standard criteria should also apply at all future sales of a First Home, secured by a 106 agreement which sets out the restrictions on the property must remain in perpetuity (although the sales price cap will only apply to the first sale).

2.20. 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.

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

### **Housing and economic needs assessment (2020)**

2.22. This guidance 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 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.

2.23. 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.

2.24. The guidance goes through steps for 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 standard methodology has introduced an uplift on the need figure determined through the standard method for the top 20 cities and urban areas in England, including Manchester.

- 2.25. 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).
- 2.26. 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: optional technical standards (2015)**

- 2.27. 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.
- 2.28. The PPG is clear that where a local planning authority wishes to require an internal space standard, they should only do so by reference in their local plan to the nationally described space standard<sup>4</sup>.

### **Self-build and custom house building (2021)**

- 2.29. 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.
- 2.30. Relevant authorities must give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area. The level of demand is established by reference to the number of entries added to an authority's register during a base period.
- 2.31. The first base period begins on the day on which the register (which meets the requirement of the Self-build and Custom Housebuilding Act 2015) is established and ends on 30 October 2016. Each subsequent base period is the period of 12 months beginning immediately after the end of the previous base period. Subsequent base periods will therefore run from 31 October to 30 October each year.
- 2.32. At the end of each base period, relevant authorities have 3 years in which to permission an equivalent number of plots of land, which are suitable for self-build and custom housebuilding, as there are entries for that base period.
- 2.33. More details on Oldham Council's self-build and custom housebuilding register can be found in section 6 of this topic paper.

### **Planning Policy for Traveller Sites (2012)**

- 2.34. This document sets out the Government's planning policy for traveller

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<sup>4</sup> <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

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)**

- 2.35. 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.
- 2.36. 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.
- 2.37. Further information on Oldham's Brownfield Register is contained within section 3 of this topic paper.

### **Rural Exception Sites**

- 2.38. 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."<sup>5</sup>
- 2.39. 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. 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 there are special circumstances (as per paragraph 84 of NPPF).
- 2.40. Rural exception sites are also listed under the exceptional circumstances for development in the Green Belt (NPPF, paragraph 154), 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 66 of NPPF).

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<sup>5</sup> Annex 2 Glossary - Rural Exception Sites (<https://www.gov.uk/government/publications/national-planning-policy-framework--2>)

- 2.41. There are 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.
- 2.42. The scope for this may be further considered through the site allocations work and neighbourhood plans.

### **Vacant Building Credit**

- 2.43. Vacant Building Credit (VBC) is intended to incentivise brownfield development, including the reuse or redevelopment of empty and redundant buildings. 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<sup>6</sup>. Affordable housing contributions may be required 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. An example is provided in planning guidance<sup>7</sup>.
- 2.44. 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
- 2.45. 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 also be appropriate to align VBC policy with employment policy relating to the loss of employment land to ensure consistency.
- 2.46. Finally, heritage assets, such as mills, should be protected and enhanced where possible when considering VBC. VBC should support the conversion of mills rather than facilitate demolition, where possible.
- 2.47. The specific criteria identified within the Local Plan policy for applying VBC is set

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<sup>6</sup> NPPF Paragraph 36; footnote 28.

<sup>7</sup> Planning Guidance: Planning Obligations, 027 Reference ID: 23b-027-20190315, available at: <https://www.gov.uk/guidance/planning-obligations>

out within section 6 of this topic paper.

### **Housing our Ageing Population Panel for Innovation (HAPPI)**

2.48. 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. The principles reflect:

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

2.49. For local authorities, HAPPI recommends that:

- Local Plan's should give 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.

### 3. Regional Context

#### Greater Manchester Strategy 2021-2031, GMCA

- 3.1. The Strategy<sup>8</sup> is Greater Manchester's plan for all communities, neighbourhoods, towns and cities which make up the city-region. It is a plan for recovery and renewal following the pandemic.
- 3.2. The Strategy aims to achieve the shared vision of 'Good Lives for All: that Greater Manchester is a great place to grow up, get on and grow old; a great place to invest, do business, visit and study' and how this will be achieved.
- 3.3. The Strategy builds on the work undertaken by the Greater Manchester Strategy - Our People, Our Place (2017), by ensuring that all the people in Greater Manchester have access to safe, decent and affordable transport, accelerate plans towards carbon neutrality, creation of greener homes and communities and better jobs and skills.
- 3.4. The Strategy focuses on three key themes of:
  - A greener Greater Manchester – focusing on tackling climate change and working toward our carbon neutral aim;
  - A fairer Greater Manchester – addressing inequality and levelling-up, from access to good jobs, to transport, health and housing.
  - A more prosperous Greater Manchester – delivering economic growth which is more equitable and socially responsible, bringing opportunities and prosperity to all.
- 3.5. Housing is a key component of the Strategy in terms of delivering growth and reducing inequality.

#### Greater Manchester Housing Strategy (GMCA, 2019-2024)

- 3.6. The Strategy<sup>9</sup> is based on and builds upon the Greater Manchester Strategy (2017). 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 Strategy is structured around three main elements - housing, people and place; existing stock; and new homes needed.
- 3.7. The vision is that:
  - those of us in need, homeless or at risk of becoming homeless can quickly access social housing or other affordable housing options; and
  - no-one will need to sleep rough in GM.
- 3.8. 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

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<sup>8</sup> Available at: <https://aboutgreatermanchester.com/the-greater-manchester-strategy-2021-2031/>

<sup>9</sup> Available at: <https://www.greatermanchester-ca.gov.uk/media/2257/gm-housing-strategy-2019-2024.pdf>

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.

3.9. 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.

3.10. 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. The actions fall under two strategic priorities: 'A safe, healthy, accessible home for all' and 'Delivering the new homes we need'.

### **Places for Everyone (PfE)**

3.11. The Places for Everyone (PfE) Joint Development Plan Document (DPD)<sup>10</sup>, is a strategic plan that will, upon adoption, cover nine of the ten Greater Manchester districts - Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan.

3.12. The most relevant PfE policies relating to Housing are:

- **JP-H1 Scale, Distribution and Phasing of New Housing Development** – sets out the housing requirement for each district over the plan period. For Oldham PfE identifies a stepped housing requirement of 404 homes per year for 2022-2025, 680 homes per year for 2025-2030, and 772 homes per year for 2030-2039. The stepped requirement equates to an average of 680 homes per year. Across the plan period the total housing need for Oldham is 11,560, including a buffer to provide flexibility;

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<sup>10</sup> Available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/>

- **JP-H2 Affordability of New Housing** – sets out the need to increase affordable housing, including that Local Plans should identify targets for the provision of affordable housing; and that affordable housing should be mixed within developments;
- **JP-H3 Type, Size and Design of New Housing** – identifies the need for a diverse range of housing, including housing for the ageing population of Greater Manchester; sets out the requirement that all new dwellings must comply with Nationally Described Space Standards and be built to the ‘accessible and adaptable’ standard in Part M4(2) of the Building Regulations; and
- **JP-H4 Housing Densities** – identifies that new development should be delivered at a density appropriate to its location and reflecting the relative accessibility of the site by walking, cycling and public transport and the need to achieve efficient use of land and high-quality design. Sets out minimum densities in this regard dependent on site location and accessibility. Also specifies appropriate housing mix related to these densities.

3.13. Chapter 11 of PfE also allocates sites for employment and housing development outside of the urban area – in Oldham the housing allocations are JPA12 Beal Valley, JPA13 Bottom Field Farm, JPA14 Broadbent Moss, JPA15 Chew Brook Vale, JPA16 Cowlshaw, JPA17 Land south of Coal Pit Lane’ and JPA18 South of Rosary Road.

## 4. Local Context

### The Oldham Plan

- 4.1. The Oldham Plan ‘Our Future Oldham - A shared vision for 2030’<sup>11</sup> prepared by the Oldham Partnership, sets the direction for the borough.
- 4.2. The main aim of the Oldham Partnership, through the Plan, is to ‘uplift every resident’. This includes having a homes that are affordable, well-maintained and appropriate.

### Oldham Council Corporate Plan

- 4.3. The Oldham Council [Corporate Plan 2022-27](#)<sup>12</sup> sets out the council’s priorities, with specific actions for 2022-25. It works in parallel with the Oldham Plan and sets out what its priorities mean for Oldham:
  - Healthy, safe and well supported residents
  - A better start and skills for life
  - Better jobs and dynamic businesses
  - Quality homes for everyone

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<sup>11</sup> Available at: [https://www.oldham.gov.uk/info/200146/strategies\\_plans\\_and\\_policies/2960/the\\_oldham\\_plan\\_-\\_our\\_future\\_oldham](https://www.oldham.gov.uk/info/200146/strategies_plans_and_policies/2960/the_oldham_plan_-_our_future_oldham)

<sup>12</sup> Available at: [https://www.oldham.gov.uk/info/200146/strategies\\_plans\\_and\\_policies/2888/corporate\\_plan](https://www.oldham.gov.uk/info/200146/strategies_plans_and_policies/2888/corporate_plan)

- A clean and green future
- 4.4. Delivering against these priorities means that the council can help residents and make Oldham the best place it can be.
  - 4.5. The Corporate Plan specifically references the delivery of quality homes to meet local housing needs.
  - 4.6. The Local Plan represents the spatial expression of The Oldham Plan and the council's Corporate Plan. Their aspirations and priorities are the golden thread that runs through the Plan, along with supporting and facilitating the delivery of the council's ambitious Creating a Better Place agenda.

### **Creating a Better Place**

- 4.7. Through delivering Oldham Council's bold vision for Oldham Town Centre and the wider borough and the ambitions of Creating a Better Place<sup>13</sup> by 2030 Oldham we be a place where business and enterprise can thrive and where people will want to live, visit, relax and work.
- 4.8. Underneath the overarching theme of Creating a Better Place there sits several key issues that policies within the Local Plan seek to address such as, in relation to housing, providing quality homes across the borough to address our local housing need, including those of specific groups and diversify the housing stock.

### **Oldham's Housing Strategy (Oldham Council, 2019)**

- 4.9. The aim of the Housing Strategy<sup>14</sup> 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.
- 4.10. 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.
- 4.11. 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; and

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<sup>13</sup> 'Creating a Better Place', more information is available at: [https://www.oldham.gov.uk/info/201248/creating\\_a\\_better\\_place](https://www.oldham.gov.uk/info/201248/creating_a_better_place)

<sup>14</sup> Available at: [https://www.oldham.gov.uk/info/200584/housing\\_strategies\\_and\\_research](https://www.oldham.gov.uk/info/200584/housing_strategies_and_research)

- Improved quality and condition of homes and tenancies for private tenants.

4.12. The Strategy identifies several housing challenges facing the borough, in particular:

- Housing delivery, including the ability to meet housing need.
- 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.

4.13. The strategy also sets out 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. As such, 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 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.
- 4.14. In terms of delivering the Housing Offer, addressing challenges and maximising opportunities, the strategy sets out a range of actions, including:
- Developing partnerships with committed developers and registered housing providers to build homes and places.
  - 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.
  - 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, exploring sources of support or funding and improving housing markets in some localities through upgrading the quality of existing homes, environments and management practices.
- 4.15. The Strategy also states that the Local Plan will provide a steer on requirements for major development sites to support their comprehensive, sustainable development and integration into surrounding neighbourhoods.
- 4.16. The Housing Strategy also includes the [Local Housing Needs Assessment \(LHNA\)](#)<sup>15</sup>. The LHNA provides evidence on housing needs and supply and informed the Housing Strategy and has informed the policy development of policies within the Local Plan. A partial update to the LHNA is currently underway and will inform the development of housing policies within the Local Plan at Publication Plan stage, as appropriate. Further detail on the LHNA is included throughout this topic paper.

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<sup>15</sup> Available at:

[https://www.oldham.gov.uk/downloads/file/5590/local\\_housing\\_needs\\_assessment\\_2019](https://www.oldham.gov.uk/downloads/file/5590/local_housing_needs_assessment_2019)

## 5. Consultation Feedback

### Regulation 18 Notification Consultation

- 5.1. To begin preparation of the Local Plan the council carried out a 'Regulation 18' notification between July and August 2017 through which 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.
- 5.2. 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.
- 5.3. The main messages that came out of the Regulation 18 Notification consultation regarding housing were:
  - A strategy for ensuring the longer-term sustainability of areas should 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;
  - The Local Plan needs to consider how existing housing quality can be improved, remodelled and regenerated to complement supply;
  - The need to provide for a 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. This creates a transient population that is less committed to the area;
  - Housing provision should recognise changing trends towards smaller families, single occupants and downsizers, in the form of smaller houses, flats and townhouses.
  - Focus the provision of affordable housing in those areas where it is needed. 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;
  - Need to ensure a balance between affordable housing and viability;
  - Need to provide specific types of housing for particular groups, such as older persons, younger people and large families;
  - Need a high-quality housing offer in town centres;
  - Brownfield land should be prioritised for development

## Regulation 18 Issues and Options Consultation

- 5.4. The Oldham Local Plan: Issues and Options consultation in 2021 identified housing as one of the key themes for the new Local Plan to address.
- 5.5. As part of the consultation we asked the following questions with regards to housing:
- Should all new homes be built as a Lifetime Home or should a specific requirement be identified?
  - Should the council identify specific sites suitable for specialist provision for older persons?
  - In what other ways do you think the council could help to deliver homes for the ageing population?
  - Do you think the Local Plan should identify a specific mix of housing type and size to be delivered?
  - Should the Local Plan set out a requirement for a particular proportion of larger housing and level access / bungalow properties?
  - Questions on minimum housing density requirements (as identified in PfE), including appropriate exceptions to providing the required density
  - Should an affordable housing requirement be applied borough-wide or should there be a different requirement for different parts of the borough, in line with housing need?
  - What proportion of all new homes should be for affordable housing?
  - What tenure split of affordable housing should be set out?
  - Should type and size requirements for affordable housing be set out?
  - Questions around the application of Vacant Building Credit
  - Would you agree with the introduction of an Article 4 direction to remove permitted development rights for HMOs (should evidence allow) and if so where should this be applied?
  - Should criteria or standards for HMOs be identified?
  - Questions around the provision of housing opportunities for self and custom housing building and community-led housebuilding
  - Should there be a specific policy on the use of properties as children's homes?
  - Questions on saved UDP housing and mixed-use allocations.
- 5.6. We have reviewed the responses and the main issues raised in relation to housing are summarised throughout the remainder of this paper.

## 6. Housing and the Draft Local Plan

- 6.1. Key policy areas have been identified that are addressed in this topic paper. For each of these, further detail is provided on how comments received to the Issues and Options consultation and relevant evidence have helped to shape the proposed policy approach and how this has also been informed by the findings of the Integrated Assessment. There are also details of further work that may be required to inform the next stage of the plan-making process – the Regulation 19 Publication Plan.

### Policy H1 Delivering a Diverse Housing Offer, Policy H2 Housing Mix and Policy H3 Density of New Housing

#### Feedback from Issues and Options Consultation

- 6.2. Policy H1 is an overarching policy that supports the delivery of sustainable housing development. The consultation responses at Issues and Options were specific to the questions (see paragraph 5.6) that were asked, therefore feedback in relation to the content within policy H1 was limited. However, general feedback was provided on housing delivery which noted concerns relating to building homes on Green Belt, support for developing brownfield sites, and conversely concerns relating to an over reliance on brownfield sites.
- 6.3. The consultation responses at Issues and Options stage in relation to policies H2 and H3 are summarised below.
- 6.4. In terms of housing mix (Policy H2) there was general support for the Local Plan identifying housing mix requirements in line with housing need. However, some responses highlighted the need to be flexible and market-led, stating that a prescriptive mix can be too restrictive as needs and demands vary depending on location. There was support for the development of bungalows.
- 6.5. In terms of density of new housing (Policy H3), the questions asked were limited as PfE sets out this policy, which is then 'localised' in Policy H3. However, in relation to the questions asked, there was a mixed response in terms of the minimum density requirements. Respondents noted that the requirements are too prescriptive and building at higher density could perpetuate housing issues and may mean that housing needs, such as larger family homes, are not provided for. Also, that residential density should be based on local character. However, other respondents noted that it was important to build at higher density to make the most efficient use of land. Some respondents also noted that more clarity was required in relation to the application of the requirements for district centres.

#### Issues to be addressed

- 6.6. In terms of policies H1, H2 and H3 the issues that need to be addressed through the Local Plan are set out below.

#### Housing Supply and Delivery

- 6.7. Oldham's local housing need (the number of new homes needed) is set out in Places for Everyone (PfE). PfE sets out that Oldham is required to deliver 11,560 homes over the period of 2022-2039, which equates to an average of 680 homes per year. The housing requirement is phased through a stepped housing requirement as set out in Table 1.

Table 1: Phasing of Housing Requirement<sup>16</sup>

	Annual Average	2022-2025	2025-2030	2030-2039	Total
<b>Number of homes required</b>	680	404	680	772	11,560

- 6.8. This housing requirement is significantly higher than the currently adopted Local Plan housing requirement of 289 new homes per year, and higher than that of recent average annual completions, which in the past ten years have averaged 439 homes a year (net). As such, the Local Plan needs to support the delivery of housing to meet this need.
- 6.9. Oldham’s housing land supply, as is set out within the SHLAA<sup>17</sup>, identifies land to accommodate 11,270 homes<sup>18</sup> over the plan period and beyond. Whilst the SHLAA identifies land that may be suitable for housing, it is important that housing is delivered to meet our housing requirement.
- 6.10. There is a need to ensure that land is used efficiently, utilising brownfield land, to reduce the need for greenfield land to meet housing needs. As such, housing should be built at appropriate densities, taking into account location and sustainability, to ensure the most effective use of land.
- 6.11. In terms of the housing supply, there are few large sites identified within the housing land supply, which are more attractive to volume housebuilders, tend to be built out faster and are generally less susceptible to market changes, making them less likely to lapse or stall. Therefore, a large proportion of the housing land supply is made up of small sites which tend to be built out slower and by individual builders or small developers, who are more susceptible to market changes and are less financially stable if problems occur. These sites tend to lapse and stall more frequently than larger schemes.
- 6.12. In addition, the majority of the housing land supply is made up of sites outside the planning system, which means they require planning permission 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.
- 6.13. There are also 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.

<sup>16</sup> Adapted from PfE JP-H1 Table 7.2.

<sup>17</sup> The base date for the SHLAA that relates to the Draft Local Plan is as of April 2022. The SHLAA is a live document which is updated annually. An update for 2023 will be published online in due course.

<sup>18</sup> This represents the baseline housing supply and does not include the PfE Strategic Allocations, which will be delivered in addition to this.

## Housing Mix

- 6.14. It is important that the Local Plan ensures a diverse range of housing that is attractive and meets the needs of different sections of the population at different life stages.
- 6.15. [The Local Housing Needs Assessment \(LHNA\) \(2019\)](#)<sup>19</sup> has assessed current housing provision and future needs and has found that there are imbalances in the size, mix and type of new homes required across the borough to meet local housing needs. There is also increasing numbers of people at risk of, or currently experiencing, homelessness in the borough. In addition, 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.
- 6.16. There are also issues of overcrowding in some of Oldham's neighbourhoods, sometimes owing to a high proportion of terraced housing, and an increased need for larger inter-generational family housing.
- 6.17. PfE (policy JP-H4) sets 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.

## Housing Density

- 6.18. There is a need to ensure that we make the best use of our available housing land, in particular utilising our supply of brownfield land in the most efficient way. Ensuring brownfield land is used efficiently means that less land will be required for housing, thereby assisting the protection of our green spaces.
- 6.19. PfE Policy JP-H4 sets out minimum densities for developments relative to their accessibility to public transport and key services. Increasing the densities of development in appropriate locations will help reduce the need to travel by car, as more people will live closer to shops, services and public transport links, enabling more active travel. Increasing densities for development within our town centres will also support the regeneration of them, in line with the aims of Creating a Better Place, creating centres where people can live, work and partake in leisure activities.

## Evidence Base

### Housing Requirement

- 6.20. A key principle of plan-making is to determine and plan for the housing needs of the area. As stated earlier, once adopted, PfE will form a key part of Oldham's Local

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<sup>19</sup> Policies within this section have been informed by the evidence set out within the 2019 Local Housing Needs Assessment. A partial update of the Local Housing Needs Assessment is currently underway and will inform policies within the next stage - Publication Plan - as appropriate. The full document can be found at:  
[https://www.oldham.gov.uk/downloads/file/5590/housing\\_strategy\\_needs\\_assessment\\_report\\_2019](https://www.oldham.gov.uk/downloads/file/5590/housing_strategy_needs_assessment_report_2019)

Plan. PfE will identify how much housing land is needed and identify each district's housing requirement.

- 6.21. The Examination in Public of the PfE Publication Plan began in November 2022 and concluded in July 2023. During the examination hearings, the Inspector's requested that the PfE authorities consider a potential modification to the submitted plan period (how many years the plan will cover) of 2021-2037 to a plan period of 2022-2039 (17 years)<sup>20</sup>. It was considered that this period better aligns with the timeline for preparing the Plan.
- 6.22. PfE proposed a stepped housing requirement, whereby the number of homes required steps up in three increments in line with the identified housing land supply. It is considered that this is appropriate in allowing larger sites which may require significant levels of supporting infrastructure, to come forward in an coordinated manner.
- 6.23. The PfE Publication Plan (as submitted) set out a stepped housing requirement for Oldham of 352 homes per year for 2021-2025, 680 homes per year for 2025-2030, and 868 homes per year for 2030-2037. The modification to the plan period led to a resultant modification to the stepped housing requirement for districts. Based on the amended plan period (2022-2039) Oldham's housing requirement has changed to 404 homes per year for 2022-2025, 680 homes per year for 2025-2030, and 772 homes per year for 2030-2039. The stepped requirement equates to an average of 680 homes per year. Across the plan period the total housing need for Oldham is 11,560, including a buffer to provide flexibility.
- 6.24. Until the adoption of PfE, Oldham's housing requirement is based on the government's standard methodology for calculating local housing need<sup>21</sup>. As of April 2023, this is for 703 new homes per year.

### Housing Completions

- 6.25. Oldham's Monitoring Report monitors the implementation of the borough's current Local Plan policies against objectives and indicators. As part of this, for housing, the report provides information against indicators including those related to housing supply, delivery and housing mix.
- 6.26. The base date of the Monitoring Report which relates to the Draft Local Plan is 2021/22<sup>22</sup>. The Monitoring Report identifies key evidence relevant to policies H1 to H3 as is outlined below.
- 6.27. Table 2 below shows the number of net completions since the adoption of the Core Strategy in 2011, compared to the housing requirement (either the adopted Core

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<sup>20</sup> See Places for Everyone Plan Composite Version: Modifications Version 2023, available at: [https://www.greatermanchester-ca.gov.uk/media/8565/composite-pfe-plan\\_sep2023-reduced-file-size.pdf](https://www.greatermanchester-ca.gov.uk/media/8565/composite-pfe-plan_sep2023-reduced-file-size.pdf)

<sup>21</sup> See Planning Guidance 'Housing and economic needs assessment', paragraph 004 Reference ID: 2a-004-20201216, available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

<sup>22</sup> Oldham's Monitoring Report is updated annually. An update for 2023 has recently been published and is available online.

Strategy housing requirement or the Standard Methodology requirement). The adopted Core Strategy Housing Requirement of 289 new homes per year applied from 2011/12. In 2018/19 the Standard Methodology for Calculating Local Housing Need was introduced and will formally apply until the adoption of Places for Everyone (which will then set out Oldham’s housing requirement).

Table 2: Housing Completions 2011/12

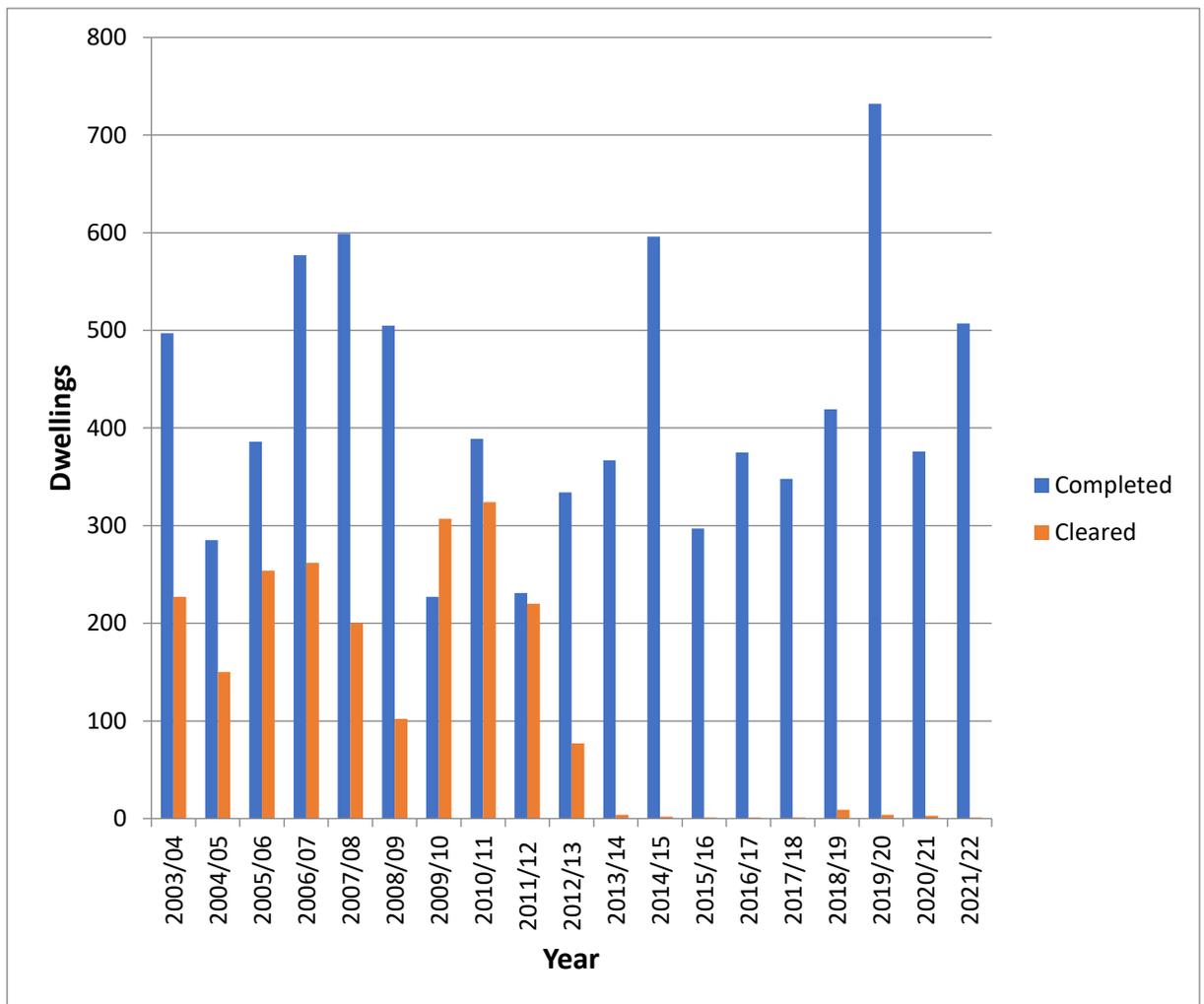
Year	Completed (net)	Housing Requirement	Variance (against housing requirement)
2011/12	11	289	-278
2012/13	257	289	-32
2013/14	363	289	74
2014/15	594	289	305
2015/16	296	289	7
2016/17	374	289	85
2017/18	345	289	56
2018/19	410	692	-282
2019/20	728	692	36
2020/21	373	633	-320
2021/22	506	683	-177
Total	4,257	4,783	-526

- 6.28. The number of net completions has fluctuated over the last 11 years. After falling in 2015/16, completions increased again from 2016/17 as several larger sites began construction. Prior to this there were high levels of clearance that took place because 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 on net completions.
- 6.29. Completions for 2020/21 were significantly lower than the previous year (2019/20) and the following year of 2021/22. It is likely that the impact of Covid-19 and wider socio-economic issues may have contributed to the lower completions for 2020/21. On average over the period since the adoption of the Joint Core Strategy an average of 439 dwellings have been completed annually.
- 6.30. This highlights the challenge of delivering a higher housing need, such as that of the Standard Methodology (705 homes per year as applies to 2021/22) or the stepped requirement in Places for Everyone compared to the Joint Core Strategy

requirement (289 home per year) and reflects the need to support the delivery of housing in the borough.

- 6.31. The monitoring report also identifies housing completions compared to levels of clearance. To illustrate clearance levels over the longer-term, figure 1 below identifies the level of clearance compared to housing completions between 2003/04 and 2021/22.

**Figure 1: Housing completions compared to clearance 2003/04 to 2021/22**



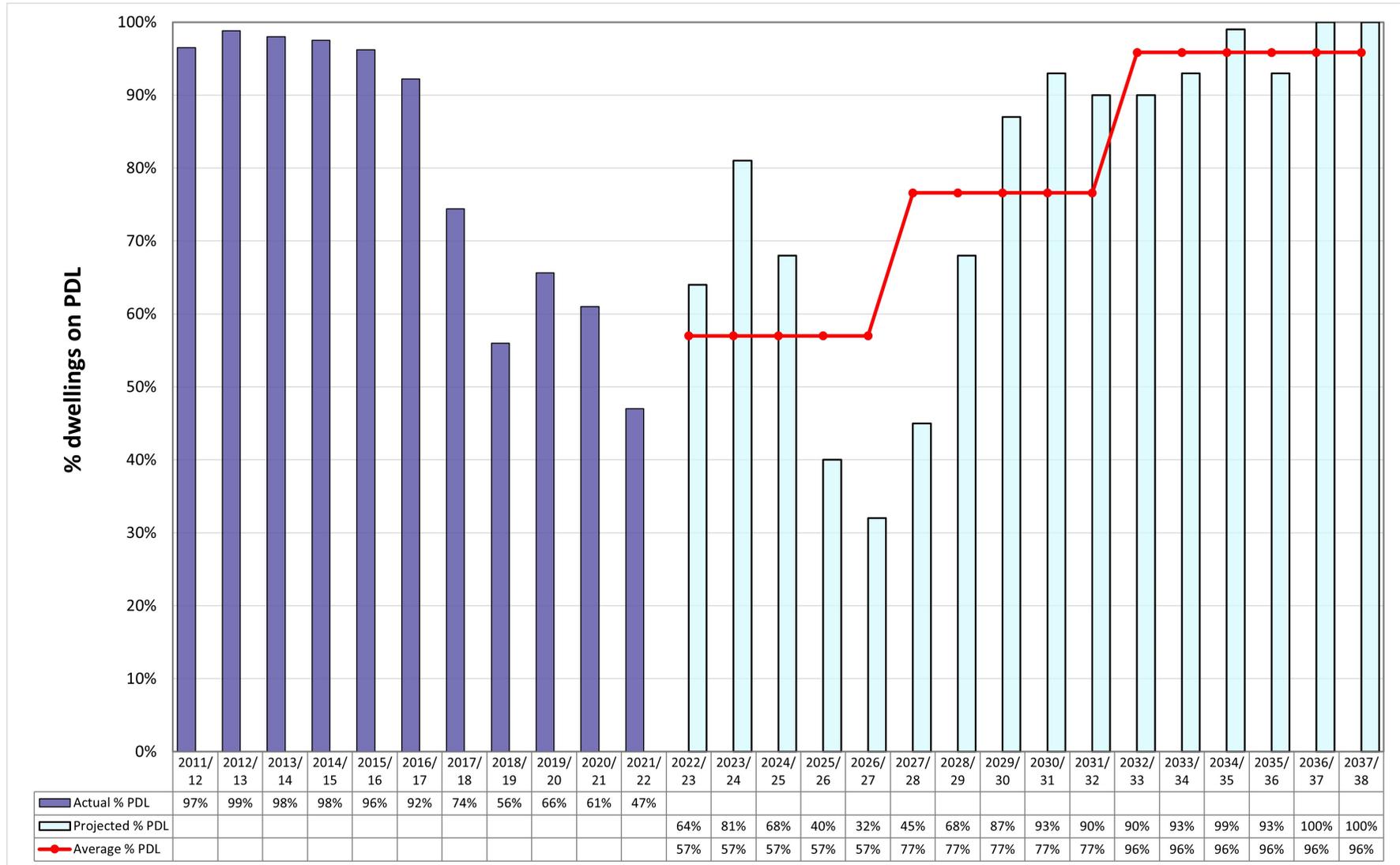
- 6.32. As set out above and shown in figure 1, high levels of clearance took place in the borough between 2003/04 and 2012/13 owing to regeneration activity (including housing market renewal initiatives). Since 2013/14, clearance has been low. Based on this, it is expected that levels of clearance over the plan period of the Draft Local Plan will also be minor.

Previously developed land

- 6.33. The Monitoring Report measures the number of dwellings delivered on previously developed land.

- 6.34. In 2020/21, 47% (236) of new and converted dwellings were completed on previously developed land (PDL) in Oldham. This is lower than 2020/21 (61%) and is below the Joint Core Strategy target of 80%. However, it should be noted that there were another 86 dwellings completed in 2021/22 on mixed sites which contain both PDL and greenfield land. These are not included in the PDL figure. Therefore 64% of all dwellings completed in 2021/22 were on PDL or mixed sites. Brownfield and mixed sites still make up the majority of sites within the housing land supply.
- 6.35. The previously developed land trajectory (figure 2) shows:
- 78% of all completions during 2011/12 to 2021/22 were on PDL;
  - Projections for the next five years (2022/23 to 2026/27) are based on sites within the five-year housing land supply. The trajectory shows that on average 57% of the five-year supply is on PDL; and
  - Overall, an average of 87% of all dwellings identified as part of the borough's potential housing land supply (i.e. post five-year supply) are on PDL.
- 6.36. The projections included in the trajectory relating to the five-year housing land supply and post five-year supply do not include dwellings to be delivered on sites where there is a mix of greenfield and previously developed land. In terms of the five-year supply, there are 650 dwellings on mixed sites (21% of the five-year supply) and 652 dwellings on mixed sites in the post five-year supply (9% of the post five-year supply).

Figure 2: Previously Developed Land Trajectory (2021/22)



## Housing Land Supply - Strategic Housing Land Availability Assessment (SHLAA)

- 6.37. 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.
- 6.38. The base date for the SHLAA that relates to the Draft Local Plan is as of April 2022. The SHLAA is a live document which is updated annually. An update for 2023 will be published online in due course. The SHLAA is a technical document identifying land that might have potential for housing at some stage in the future, as required by NPPF<sup>23</sup>.
- 6.39. 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.
- 6.40. 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 its housing land requirement. This part of the topic paper only considers the key findings of the SHLAA.
- 6.41. The sites within the SHLAA are split into different categories depending on their planning status and position within the housing land supply:
- Sites under construction (sites that have received planning permission and a material start has been made on site; the capacity figure quoted is the remaining number of dwellings yet to be completed);
  - Sites with extant (current) full or outline residential planning permission;
  - Saved housing allocations (UDP Phase 1 and 2);
  - Lapsed and Stalled housing sites (sites that have previously had planning permission for housing but where this has expired before being implemented; also "stalled" sites where a material start has been made but where there has been no development activity for at least five years); 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

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<sup>23</sup> NPPF Paragraph 69, pages 73-75

allocated for residential use. On the whole, these sites are considered unconstrained in relation to significant policy or physical limitations).

- 6.42. The SHLAA provides the five-year land supply position covering the period between 1 April 2022 and 31 March 2027 and 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 2022, showing the number of dwellings in each category and places them in five-year periods, up to 2030 and beyond.

Table 3: Housing Land Supply (as at 1 April 2022)

Site Category/ Status	Total Dwellings Years 2022-2027	Total Dwellings Years 2027-2032	Total Dwellings Years 2032-2039	Total Dwellings Years 2039+ (post plan)	Total Dwellings All Periods
Sites under construction	1,256	0	0	0	1,256
Sites with extant planning permission	1,094	579	0	0	1,673
Saved UDP Phase 1 housing allocations	7	358	0	0	365
Saved UDP Phase 2 housing allocations	3	181	0	0	184
Lapsed and stalled sites >5 dwellings	121	438	328	0	887
Potential sites	648	2,257	3,013	88	6,006
<i>Subtotal</i>	<i>3,129</i>	<i>3,813</i>	<i>3,341</i>	<i>88</i>	<i>10,371</i>
Small sites allowance minus any small sites already identified in supply	0	410	574	0	984
Clearance allowance	25	25	35	0	85
<b>Total</b>	<b>3,104</b>	<b>4,198</b>	<b>3,880</b>	<b>88</b>	<b>11,270</b>

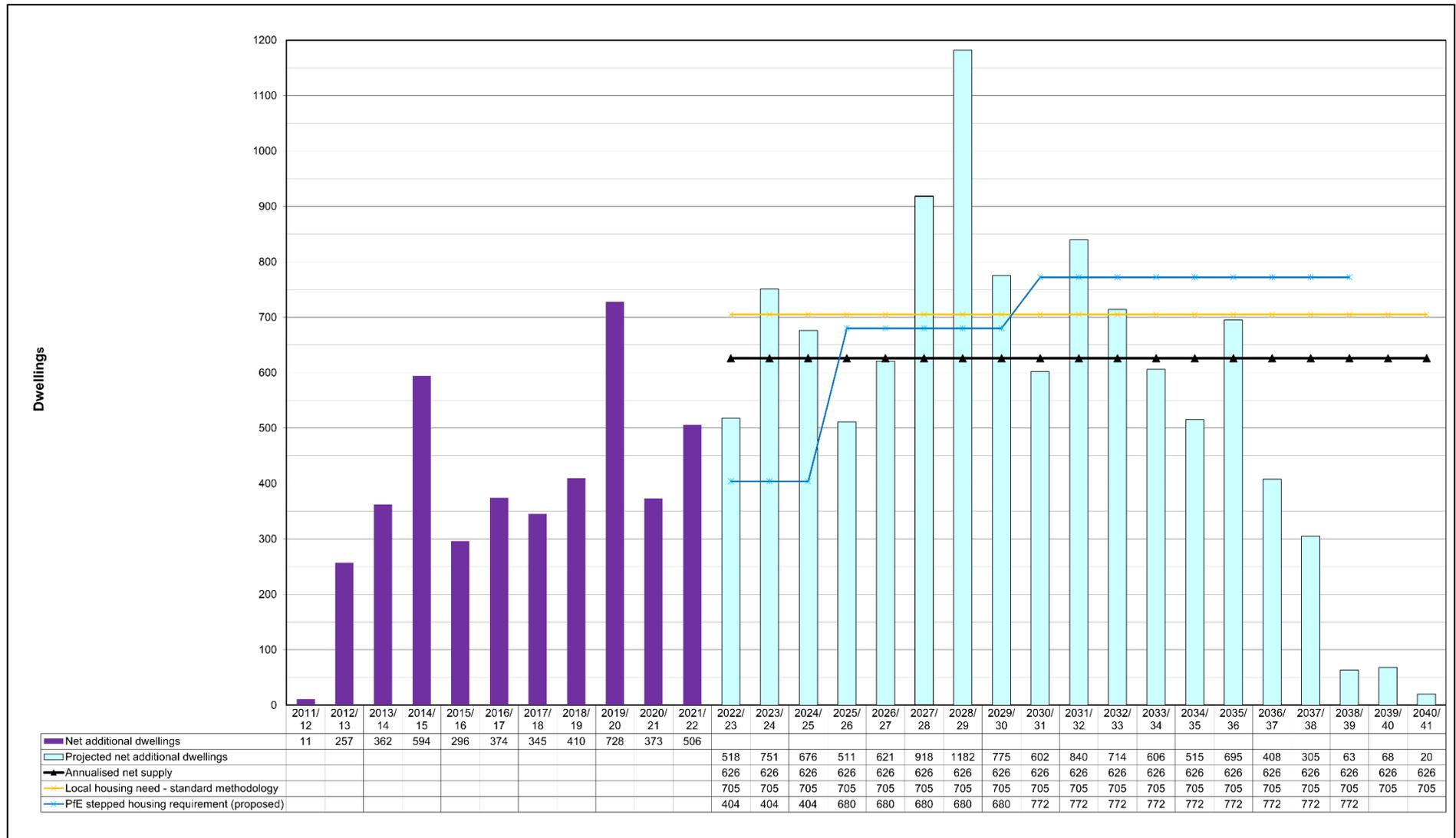
- 6.43. The SHLAA (as at 1 April 2022) identifies a baseline<sup>24</sup> housing land supply of 10,371 homes. This increases to 11,270 homes when taking into account the small sites and clearance allowances.
- 6.44. Table three shows that 58% of the existing housing land supply is on potential housing sites. This means that 42% 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 2027 onwards.
- 6.45. 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.
- 6.46. 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 2017 to 31 March 2022. This shows that 411 homes have been completed on small sites in this period (around 17% of all completions over this time), equating to an average of 82 homes per annum.
- 6.47. Increasing the number of homes within Oldham Town Centre is a key priority of Oldham's Creating a Better Place Framework. The SHLAA identifies 2,942 homes as being deliverable in the short to long term within Oldham Town Centre. Of these, 175 homes are identified within the short term (2022-2027); 986 homes are identified within the medium term (2027-2032); 1,693 homes are identified within the long term (2032-2039); and 88 homes are identified within the post plan period (post 2039).
- 6.48. The SHLAA identifies 128 homes within the borough's other centres as being deliverable in the short to long term.
- 6.49. The housing trajectory below (figure 3) 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 period. It takes account of projected clearance and the small sites allowance.
- 6.50. Figure 3 illustrates that there is expected to be an increase in the annual average completion rate over the next five years (2022/23 to 2026/27) with 2,706 net

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<sup>24</sup> Not including homes to be delivered on the PfE Strategic Allocations.

completions over this period (taking account of expected clearance). This equates to an annual average of 615 dwellings over this five-year 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. Overall, the total housing land supply equates to an annual average projected supply of 626 dwellings per year.

Figure 3: Housing Land Supply Trajectory (as at April 2022)



## Oldham's Brownfield Land Register

- 6.51. As required by the Town and Country Planning (Brownfield Land Register) Regulations (2017), Oldham maintains a [Brownfield Land Register](#)<sup>25</sup>. 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.
- 6.52. The Brownfield Land Register 2022 update applies to the Draft Local Plan<sup>26</sup>.
- 6.53. 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).
- 6.54. 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 1 April 2022) have, or have previously had, planning permission for residential development for at least five dwellings<sup>(4)</sup>;
  - Other sites without residential planning permission which have been identified as “suitable”, “available” and “achievable” in the SHLAA, as at 1 April 2022.
- 6.55. 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.
- 6.56. For the 2022 update, the register contains 190 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 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.
- 6.57. The council has not included any sites within 'Part 2' of the Register.

## Oldham's Housing Delivery Action Plan (2021)

- 6.58. Oldham Council published its first Action Plan in 2019 in response to the first HDT result. The most recently published Action Plan was published in [September 2022](#)<sup>27</sup>, in response to the HDT result for 2021. A HDT result for 2022 has not been published as yet, and as

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<sup>25</sup> Oldham Council's Brownfield Land Register is available at: [https://www.oldham.gov.uk/homepage/1386/brownfield\\_land\\_register](https://www.oldham.gov.uk/homepage/1386/brownfield_land_register)

<sup>26</sup> An update for 2023 has recently been published and is available online.

<sup>27</sup> Oldham Housing Delivery Action Plan (2022), available at: [https://www.oldham.gov.uk/info/201230/monitoring/2135/housing\\_delivery\\_action\\_plan](https://www.oldham.gov.uk/info/201230/monitoring/2135/housing_delivery_action_plan)

such no subsequent Action Plan update has been prepared to date.

- 6.59. The 2022 Action Plan complements several existing council plans, policies and strategies which together provide a framework for the delivery of the council's housing priorities.
- 6.60. The Action 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.
- 6.61. The key findings from the analysis of housing delivery and the make-up of the housing land supply carried out for the Action Plan, has identified several issues which together contribute towards under-delivery within the borough. In summary these are:
- The increase in Oldham's housing requirement 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.
  - The scale of development coming forward – minor sites (of less than 10 dwellings) make up the majority of sites granted planning permission in the last eleven years (68%). 'Major' sites in Oldham are still relatively small with the majority having a capacity of under 50 dwellings (although more recently there are several larger sites coming forward for over 150 homes).
  - 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 as the analysis indicates that these are more attractive for housebuilders and 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 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.
- 6.62. The Action Plan set out a full update on progress on the housing delivery actions. Several 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) 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.

### Population Projections

- 6.63. Oldham is home to around 242,100 residents who live across five districts and twenty wards and make up 8.4% of Greater Manchester's population.
- 6.64. The borough has a higher proportion (34.8%) of ethnic minority residents than in Greater Manchester (28.7%), the North-West (18.8%), and England (26.5%). The ethnic composition in Oldham currently stands at 68.1% White, 13.5% Pakistani, 9% Bangladeshi and 9.3% 'other'. Equality and diversity are embraced within Oldham and the number of ethnically diverse communities continue to grow. This diversity is reflected within schools, with over 90 different languages recorded as being spoken. Oldham brings together a variety of cultures and is proud of the uniqueness that this brings to the borough.
- 6.65. The borough has a relatively young population, with a high proportion (22.7%) of residents aged under 16 and proportionally fewer (15.9%) aged 65 and over. Our increasing population profile is a result of improving life expectancy, internal migration and the growth in Pakistani and Bangladeshi communities.

### Housing Mix

- 6.66. The 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.
- 6.67. A partial update of the LHNA is currently underway. Any updated evidence will inform policies within the Publication Plan, including those on Housing Mix, as appropriate.

6.68. Within this section, the LHNA evidence relating specifically to housing type, size and mix is outlined. Subsequent sections of this topic paper will outline other evidence contained within the LHNA, such as that on particular housing needs and affordable housing.

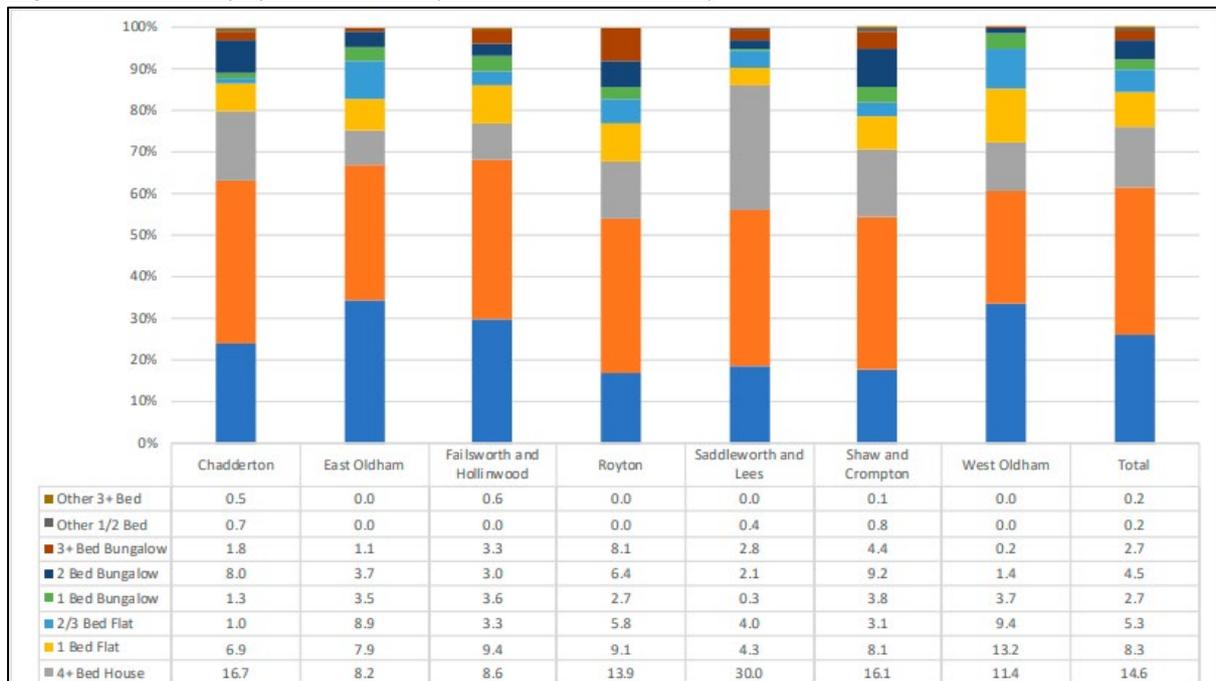
6.69. The LHNA found that:

- 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); and
- 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).

6.70. Figure 4 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.

Figure 4: Property type and size (source: LHNA, 2019)



6.71. Based on the 2018 Household Survey, the LHNA identified that there were 10,173 existing households in affordable housing need, representing 11% of all households.

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%).

- 6.72. The LHNA analysis indicates a mix of houses (64%), bungalows (25%), flats (9%) and other types of dwellings (1%) would be appropriate. In terms of the size of market housing, the LHNA indicates that mainly dwellings of 2 bedrooms (25%) and 3 bedrooms (45%) are needed, whilst there is also a need for smaller accommodation (1 bed roomed – 18%).
- 6.73. Whilst affordable housing need will be considered in further detail at paragraphs 6.177-6.202, the preferences in terms of house type and size are relevant in evidencing the requirements for affordable housing provision as set out in policy H2.
- 6.74. The needs for affordable housing are similar to that of market housing. The analysis indicates a mix of houses (50.9%), flats (31.7%), bungalows (12.7%) and other types of dwelling (4.6%) would be appropriate.
- 6.75. 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. As such there is an increased need for two-bedroomed dwellings.
- 6.76. Across both market and affordable housing there is a particular need identified for bungalows, particularly one or two bedroomed bungalows, which there is a shortfall of in the borough. This is needed to cater for Oldham's increasing older population and people with disabilities and mobility needs. The area with the greatest need for bungalows is within Shaw and Crompton and Royton.

#### Housing Density

- 6.77. The Monitoring Report monitors the density of completed dwellings. Table 4 overleaf shows the densities achieved on sites of five dwellings or more over the past five years (prior to 2022).

Table 4: Housing densities achieved on schemes of 5 dwellings and more 2017 to 2022

Year	2017/18	2018/19	2019/20	2020/21	2021/22
<b>Total number of dwellings completed</b>	<b>345</b>	<b>410</b>	<b>728</b>	<b>373</b>	<b>506</b>
<b>Density</b>	<b>No. %</b>	<b>No. %</b>	<b>No. %</b>	<b>No %</b>	<b>No %</b>
Less than 30 dwellings per hectare	57 dwellings 24%	79 dwellings 24%	158 dwellings 24%	100 dwellings 34%	173 dwellings 40%
30 to 50 dwellings per hectare	151 dwellings 63%	79 dwellings 24%	313 dwellings 47%	100 dwellings 34%	162 dwellings 38%
Over 50 dwellings per hectare	31 dwellings 13%	176 dwellings 53%	200 dwellings 30%	95 dwellings 25%	97 dwellings 22%

6.78. As table 4 shows, the density of housing development is quite variable across the years. In general, the majority of schemes over the past five years have achieved densities of between 30 and 50 dwellings per hectare.

6.79. As set out above, to ensure the most efficient use of land, it is important that housing density is maximised, where appropriate, and according to the location of the site. PfE Policy JP-H4 ensures this and has informed policy H3 of the Draft Local Plan.

#### Housing Technical Standards

6.80. Policy JP-H3 sets out several housing standard requirements which have been reflected in Local Plan policy H3, including that:

- All new dwellings must: 1. Comply with the nationally described space standards; and 2. Be built to the ‘accessible and adaptable’ standard in Part M4(2) of the Building Regulations unless specific site conditions make this impracticable.

6.81. In 2015 the government published the Technical Housing Standards - Nationally Described Space Standards (NDSS)<sup>28</sup>. This sets out minimum space standards for the gross internal (floor) area of new dwellings, dimensions for key parts of the home (particularly bedrooms), storage space and floor to ceiling height.

<sup>28</sup> <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard/technical-housing-standards-nationally-described-space-standard>

6.82. Table 5 below shows the minimum gross internal floor areas and storage (sqm) required by the NDSS:

Table 5: Nationally described space standards: minimum gross internal floor areas and storage (sqm)

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37 <sup>29</sup> )			1.0
1b	2p	50	58		1.5
2b	3p	61	70		2.0
2b	4p	70	79		2.0
3b	4p	74	84	90	2.5
3b	5p	86	93	99	2.5
3b	6p	95	102	108	2.5
4b	5p	90	97	103	3.0
4b	6p	99	106	112	3.0
4b	7p	108	115	121	3.0
4b	8p	117	124	130	3.0
5b	6p	103	110	116	3.5
5b	7p	112	119	125	3.5
5b	8p	121	128	134	3.5
6b	7p	116	123	129	4.0

<sup>29</sup> Where a one person flat has a shower room rather than a bathroom, the floor area may be reduced from 39m<sup>2</sup> to 37m<sup>2</sup>.

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
6b	8p	125	132	138	4.0

6.83. PPG<sup>30</sup> states that where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. In providing this justification local planning authorities should take account of the following:

- Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes;
- Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted; and
- Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions

6.84. PfE has set out justification as per the points listed above, to justify the requirement for compliance with the NDSS as set out in JP-H3, as part of the PfE examination<sup>31</sup>. In summary the justification is that:

- In terms of need, a sample of floorspace areas within dwellings being delivered (for the period of 1 April 2019 to 31 March 2020) in each district was assessed<sup>32</sup>. The data shows that 45% of the dwellings assessed failed to meet the minimum standards – 63% of houses and 27% of apartments did not meet the standards. In addition, it was found that dwelling sizes within the PfE plan area, was smaller overall than the England and Wales averages.
- In terms of viability, the PfE Strategic Viability Assessment<sup>33</sup> tests the policies contained within the plan. As part of the assessment the financial implications of the NDSS and the impact on site viability was taken into

<sup>30</sup> Housing optional technical standards PPG, paragraph 020 Reference ID: 56-020-20150327.

<sup>31</sup> GMCA response to IN6 Preliminary Questions to GMCA: Thematic Policies, GMCA 5.1 and 5.2: available at: <https://www.hwa.uk.com/site/wp-content/uploads/2023/02/Examination-Documents-List-11-October-2023-1.pdf>

<sup>32</sup> An assessment of completed schemes in Oldham is available in Appendix 5 of GMCA 5.2 (page 58), available at: <https://www.hwa.uk.com/site/wp-content/uploads/2022/03/5.2-PfE-Accessibility-Housing-technical-standards-report.pdf>

<sup>33</sup> Places for Everyone Viability Assessment, available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/previous-stages/places-for-everyone-2021-regulation-19/supporting-documents-2021/?folder=03%20Plan%20wide#fList>

consideration. Most development types were found to be able to meet the requirement in medium and higher value areas, however in low value areas there would be a need for public sector intervention to achieve viable schemes. Despite this, it would not be appropriate to exclude lower value areas from the NDSS requirement, particular as these will include more deprived areas most in need of the identified benefits of the space standards.

- In terms of timing, at the time of examination (and a later adoption date) there will have been a period of around seven years over which PfE (previously GMSF) where there has been a clear indication of the intention of the Plan to apply the NDSS to the plan area. Therefore, no transitional arrangements are necessary to allow for developers to adjust.

6.85. In relation to the requirement within JP-H2 that all new dwellings must 'Be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations unless specific site conditions make this impracticable', document GMCA 5.2<sup>34</sup> also sets out evidence to support this requirement. In summary, in terms of need the requirement is considered justified because:

- There are a number of key pressures within the PfE plan area such as lower levels of disability free and healthy life expectancy, high levels of disability and issues around mobility when compared to the regional and national averages. In addition, the PfE plan area has an ageing population which will necessitate additional dwellings being built to adaptable and accessibility standards. In addition to these demographic issues, PfE identifies that a significant portion of apartments will come forward within the plan area over the plan period, as such it is important that adaptability is built into the design and layout of these apartments. The M4(2) requirement will ensure that the widest range of needs can be met within the identified housing land supply, reducing the need for additional specialist housing provision.
- In terms of viability, the PfE Strategic Viability Assessment tests the policies contained within PfE. As part of the assessment the financial implications of the M4(2) requirement for new dwellings and the impact on site viability was taken into consideration. The assessment found that in general terms requiring homes to be built to the M4(2) standard would have minimal impact on the overall viability of development. The benefits in ensuring that there is flexibility / adaptability in the new housing stock are significant and will increase the resilience of the plan area as whole. The policy allows a degree of flexibility by specifying that the standards will not be applied where specific site conditions make this impracticable.

## Proposed Policy Approach and Reasons

### Policy H1 Delivering a Diverse Housing Offer

6.86. The policy provides an overarching statement of how the council will promote a diverse housing offer to meet the differing needs of all Oldham's residents. It sets out that this will be done by supporting residential development that:

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<sup>34</sup> Available at: <https://www.hwa.uk.com/site/wp-content/uploads/2022/03/5.2-PfE-Accessibility-Housing-technical-standards-report.pdf>

- is allocated for residential development through PfE or the Local Plan; or
  - is identified within the Strategic Housing Land Availability Assessment (SHLAA); or
  - is for small-scale development, comprising conversion or change of use of less than 10 dwellings.
- 6.87. It also notes support for the development of previously developed land and requires that all residential development should be sustainably located, with public transport, local services and facilities accessible to the development by active travel.
- 6.88. The policy should be read alongside PfE policies JP-H1 and JP-C1. The policy aims to add further detail to ensure that housing is delivered sustainably to meet the housing requirement set out within PfE.
- 6.89. The policy has been informed by consultation feedback from the Regulation 18 issues and options stage regarding the general approach to supporting housing and brownfield land. The policy has also been developed in line with the PfE Spatial Strategy, and policies related to housing and sustainability, specifically delivery of the housing requirement set out in PfE policy JP-H1.

### **Policy H2 Housing Mix**

- 6.90. The policy provides detail on housing mix requirements for market and affordable housing, based on local housing needs, and should be read alongside PfE policy JP-H3.
- 6.91. It sets out that new residential developments should contribute to a diverse housing mix across the borough. It specifies that within Oldham Town Centre, Oldham's other centres and within 400m of transport hubs, the housing mix shall predominantly be for apartments, in line with the minimum housing densities, as set out in Policy H3. Outside of these areas, there will be a mix of housing and apartments provided in line with the mix set out within Table H2. The policy also allows for an alternative mix, to be agreed with the council, where:
- It can be clearly evidenced that an alternative mix is required in relation to specific funding requirements and the proposed development is still able to contribute to meeting local housing needs;
  - It can be clearly demonstrated that the site has distinct characteristics that make a higher density inappropriate or impracticable, such as flood risk, design context, impact on designated and non-designated heritage assets or landscape and ecological designations or assets;
  - The development is for specialist accommodation, such as for older and/or disabled people, or there is a demonstrable need for different types of homes that cannot be delivered at a particular density (for example bungalows or residential institutions); and/ or
  - There is a need to vary existing housing mix in the locality of the proposed development, for example, to provide smaller or larger house sizes.
- 6.92. The policy requires that where there is an identified need for bungalows in an area, conditions will be attached to any new provision to remove permitted development

rights to ensure that any extensions or alterations are appropriate in retaining the level-access design of the bungalow.

- 6.93. The policy has been informed by evidence, particularly that contained within the LHNA, and consultation feedback from the Regulation 18 issues and options stage.
- 6.94. The policy has been developed in line with PfE policy JP-H3 which states that ‘residential developments should provide an appropriate mix of dwelling types and sizes reflecting local plan policies, and having regard to masterplans, guidance and relevant local evidence.’

### **Policy H3 Density of New Housing**

- 6.95. The policy reflects the housing density policy set out within PfE policy JP-H3. It provides a local interpretation and clarification on how the policy should be applied within the borough’s centres hierarchy (as was requested at Regulation 18 Issues and Options) and key transport hubs.
- 6.96. The policy also specifies that to help to assess and monitor the density of development proposals, the following measurements of density should be provided for all planning applications that include new residential units:
- Gross floorspace (m2) per dwelling;
  - Number of habitable rooms per hectare;
  - Number of bedrooms per hectare; and
  - Number of bedspaces per hectare.
- 6.97. The council will use these measurements to determine if the proposed development meets the identified density standards set out in the policy. In addition, in line with PfE policy JP-H3, the policy requires that new homes will, as a minimum, meet the nationally described space standards<sup>35</sup>.
- 6.98. The policy has been developed to provide a local interpretation/ clarification to the minimum densities for residential development as set out within PfE policy JP-H3, which was raised as a concern at Regulation 18 Issues and Options stage.

### **Integrated Assessment**

- 6.99. Policy H1 scored mostly positive or neutral, however a negative score was given against IA2 (open space) as sites in the housing land supply could include open spaces. Mitigation would be provided through policy CO1 though.
- 6.100. Policies H2 and H3 scored positively or neutral. No negative scores were given.
- 6.101. No mitigation or enhancement to policies H1, H2 and H3 was required as a result of the IA process.
- 6.102. Policies H1, H2 and H3 have been screened in by the HRA as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effect.

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<sup>35</sup> Technical housing standards – nationally described space standard. This document can be found at: <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard/technical-housing-standards-nationally-described-space-standard>

## Policy H4 Homes for Older People, Policy H5 Homes for Disabled People and Policy H6 Homes for Children and Care Leavers

6.103. Policies H4, H5 and H6 relate to the provision of specialist housing to meet local housing needs and as such as considered together below.

### Feedback from Issues and Options consultation

6.104. The consultation responses at Issues and Options stage in relation to policies H4, H5 and H6 are summarised below.

6.105. In terms of homes for older people (policy H4), there was general support for providing specialist housing provision for older people. Many respondents noted that homes for older people should be located close or within town centres, with good access to services, amenities and public transport. There was also support for providing smaller housing types for older people wishing to downsize and level access accommodation.

6.106. Whilst Issues and Options didn't specifically ask questions around housing for disabled people, some comments gathered on housing mix and homes for older people referenced homes for disabled people. Respondents commented that homes should be accessible to services and amenities and that homes should, where possible, be adaptable, allowing people to remain in their own homes should they wish to.

6.107. In terms of homes for children and care leavers (policy H6), there were few comments received, however there was some support for a specific policy being introduced.

### Issues to be addressed

6.108. In terms of the policies H4, H5 and H6 the issues that need to be addressed through the Local Plan are set out below.

#### Homes for Older People

6.109. Oldham has an ageing population, which is set to increase over the plan period placing pressure on existing older people accommodation and requiring new provision to be built suitable for older people's housing needs. This will be a major challenge for the council going forward and the Local Plan will have an important role to play in ensuring that there is a range of appropriate housing provision and that new (and existing) homes are capable of adaptation to meet the changing needs and aspirations of their occupants.

6.110. In addition, there will be a need for more specialist housing for older people over the next 15 - 20 years. 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. In particular, the amount of people living with Dementia is expected to rise by 66% (to 3,756 people) by 2030, including 2,432 people living with severe Dementia.

6.111. As such, it will be important to: ensure that on suitable sites, and in areas of need, allocations and proposals for residential development make provision for

accommodation of older people as part of the housing mix. This may take the form of bungalows, level access homes or town centre apartments; and ensuring that there is a range of appropriate housing provision adaptation and support for the borough's older population.

### Homes for Disabled People

- 6.112. The LHNA indicated that across the borough a total of 43,200 households (46.5%) contained at least one person with at least one illness/disability. However, only 9.1% of the borough's households live in properties that have been adapted or purpose built for those with an illness or disability.
- 6.113. Further analysis indicates that the number of accessible and adaptable properties through the borough will need to increase by 1,343 new homes by 2037. Supporting this, demographic modelling suggests that the number of wheelchair accessible homes needs to increase by 550 over the plan period.
- 6.114. As such, there is a need for more wheelchair accessible homes, appropriate housing for those with other physical disabilities, dementia, a learning disability and mental health disorders.

### Homes for Children and Care Leavers

- 6.115. Caring for looked after children is a key part of the council's role. There is a need to ensure that suitable housing is available for all looked after children, with a range of housing options, including smaller group homes and homes suitable for children with disabilities. Also, Oldham has a higher proportion (25%) of residents aged under 16 than the regional and national averages.
- 6.116. In particular, there is a need to support young people with complex behavioural needs and learning disabilities.

## Evidence Base

### An Ageing Population

- 6.117. 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. Oldham Council's Market Position Statement (MPS)<sup>36</sup> identifies that there are approximately 38,800 people aged 65 and over living in Oldham currently, which is expected to increase by 16% to 42,500 people by 2030. Also, the number of people in Oldham over the age of 75 is projected to increase by more than 10,000 over the plan period.
- 6.118. In terms of particular needs, in 2020 there were around 2,267 people aged 65 and over living with Dementia in Oldham. This figure is set to rise by 66% (to 3,756 people) by 2030, including 2,432 people living with sever Dementia.
- 6.119. 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

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<sup>36</sup> This document can be found at:  
[https://www.oldham.gov.uk/downloads/file/3241/adult\\_services\\_and\\_health\\_market\\_position\\_statement](https://www.oldham.gov.uk/downloads/file/3241/adult_services_and_health_market_position_statement)

increased adaptation of homes as people become frailer, and even if new housing development was built to adaptable and accessible standards (such as M4(2)), there will be a continued need for more specialist housing for older people over the next 20 years.

- 6.120. 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 (especially bungalows or level-access accommodation) and 'other' property types which include specialist provision within those households planning to move within the next five years.
- 6.121. The LHNA also found that most 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.
- 6.122. The LHNA identified that in 2018 there were 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.
- 6.123. Analysis of demographic change suggests the 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.
- 6.124. The MPS identifies that there is a growing need for extra care accommodation, sheltered accommodation and bungalows which is outstripping supply.
- 6.125. The MPS also identifies a priority to enable people to 'Live Well at Home', being well supported if they decide to stay in their existing home. This includes several services and support such as home adaptations, home support services, medication support and meal services. The need for bungalows is also recognised.
- 6.126. The definitions of provision that is suitable for older people, including the level of care that is associated with the provision, is set out in Planning Practice Guidance. Provision includes Age-restricted general market housing, Extra Care Housing, Sheltered Housing/ Assisted Living and Nursing and Care Homes.
- 6.127. In terms of the need for adaptations, the LHNA also considers needs arising for people with additional needs, including 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 and/or 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.
- 6.128. 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. The need for home adaptations may also apply to people with a disability (as well as older people).

## Homes for Disabled People

- 6.129. The LHNA considers 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.
- 6.130. Across the borough, the 2018 household survey (carried out as part of the LHNA) identified that there were 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.
- 6.131. 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. 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.
- 6.132. 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<sup>37</sup>.
- 6.133. 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 and/or disability. Analysis carried out for the LHNA suggests that the number of properties will need to increase by 1,343 to 2037.
- 6.134. 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.
- 6.135. In particular, the MPS identifies that in 2020 there were estimated to be 4,229 adults with a learning disability in Oldham – this is expected to increase by over 6% to 4,500 adults by 2030. The number of adults with autism is also expected to increase by 7% over the same period, along with an increase in the number of people experiencing a mental health disorder.
- 6.136. The LHNA update will provide further evidence on housing needs, including the types of accommodation required for people with a disability.
- 6.137. In terms of provision, it is recognised that provision for older people may also be suitable for those with disability in some circumstances, especially where the disabled resident is of an older age. However, there is a need for suitable provision for disabled people who are not within this group, who are able to live independently or semi-independently and those living in their own homes. There is also a particular need for suitable accommodation for young adults and those with complex behavioural needs.

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<sup>37</sup> Source: Oldham LHNA 2019 (ONS Family Resources Survey 2016/17 and ONS 2016-based population)

## Homes for Children and Care Leavers

- 6.138. Caring for looked after children is a key part of the council's role. There is a need to ensure that suitable housing is available for all looked after children, with a range of housing options, including smaller group homes and homes suitable for children with disabilities. Also, Oldham has a higher proportion (25%) of residents aged under 16 than the regional and national averages<sup>38</sup>.
- 6.139. A children's residential care home falls within Class C2 of the Town and Country Planning (Use Classes) Order 1987 (as amended). Such uses are intended for the provision of care and are therefore governed by the provisions of the Children's Homes (England) Regulations 2015. As such, they must be registered with OFSTED which is the regulatory body for children's care. OFSTED requires an operator to demonstrate that planning permission is either granted or not required before it will register a property. A child may live in a residential care home up to the age of 18 if their needs are judged to require the provision of care as defined by the Regulations.
- 6.140. For care leavers it is important to secure semi-independent accommodation and emergency accommodation, to support the increasing numbers of young people moving from the care system into independence.
- 6.141. A care leaver is defined by the Children (Leaving Care) Act 2000 as someone aged 16 or 17 who has been looked after by a local authority for a prescribed period, or periods amounting in all to a prescribed period, which began after they reached a prescribed age and ended after the age of 16. Local Authorities are required to prepare a pathway of support for when they cease to look after them, which can include helping them to find suitable housing to meet their needs. For some this might be supported group living accommodation, homes in multiple occupation (with or without a care element), or an affordable flat or house.
- 6.142. A semi-independent supported-living facility for young people does not provide care as defined by the Care Act Regulations. Instead, and as the name suggests, such facilities provide support and are intended to prepare a young person for fully independent adult living. Supported-living facilities do not have to register with a regulatory body. Nevertheless, as young people under the age of 18 years old cannot lawfully form their own household without the support of an adult over the age of 18 years old, the council considers such uses to fall within Class C2 of the Town and Country Planning (Use Classes) Order 1987 (as amended). This type of accommodation is only appropriate for older teenagers over the age of 16 years old who do not require the level of care provided in a regulated children's residential care home.
- 6.143. In particular, the MPS has identified that there has been an increase in the numbers of younger adults (often transitioning from children's services) with an autism diagnosis or awaiting the outcome of an assessment and requiring care and support and accommodation. The council is currently refining the needs for this service, including a projection of how many people are likely to require this support.

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<sup>38</sup> Source: Oldham in Profile - ONS 2011 Census, available at:  
[https://www.oldham.gov.uk/downloads/file/4740/oldham\\_in\\_profile\\_2017\\_pdf\\_format](https://www.oldham.gov.uk/downloads/file/4740/oldham_in_profile_2017_pdf_format)

6.144. There has been some local concern in recent years about the amount of privately managed children's homes coming forward within the borough, particularly within deprived areas. It is important that provision is sustainable located in appropriate premises and does not negatively impact the wider area.

### Proposed Policy Approach and Reasons

#### Policy H4 Homes for Older People

6.145. The policy supports the development of homes suitable for older people. Specifically, it sets out requirements for new development of 150 homes and above to provide a minimum of 30 units, and a further 20 units for each additional 200 homes thereafter, for housing provision which is suitable for older people, in line with local needs. It suggests that this could include:

- Age-restricted general market housing, such as Bungalows or level-access housing;
- Extra Care Housing;
- Sheltered Housing/ Assisted Living; and
- Nursing and Care Homes, including Dementia Care Homes.

6.146. The policy also sets out that provision for older people must meet the design standards within policy D1 and the following principles:

- Promote ease of movement on foot and with mobility aids;
- Be sustainably located, with access to public transport, local services and facilities (including a hospital or GP practice), accessible to the development via active travel means;
- Feature parking spaces and setting down points in proximity to entrances; and
- Have accessible and appropriately designed built environments, including seating areas, step free spaces and gentle approaches suitable for wheelchair users and people with visual or mobility impairments.

6.147. The policy has been developed to ensure housing needs for Oldham's ageing population can be met in the future, utilising our identified land supply as much as possible. The thresholds identified within the policy for new provision are considered suitable in terms of viability, as generally larger developments can support greater levels of additional costs, such as those associated with specialist housing provision. As stated in the policy reasoned justification, where matters of viability arise in providing a particular type of housing to meet a housing need for older people, the council will look to work with providers, to identify solutions to secure the delivery of this housing. Furthermore, a whole plan viability study will consider the policy requirements combined and as a whole to determine appropriateness. In any case, the policy requires that provision is delivered on these larger developments in line with local needs at the time of the application.

#### Policy H5 Homes for Disabled People

6.148. The policy supports the development of homes suitable for disabled people. Specifically, it sets out requirements for new development of 150 homes and above to provide a minimum of 30 units, and a further 20 units for each additional 200

homes thereafter, for housing provision which is suitable for disabled people, in line with local needs. It notes that provision suitable for older people (as set out in policy H4) may also be suitable for some disabled people, and vice versa. As such it recognises that provision under policies H4 and H5 may overlap.

6.149. However, recognising that provision may also vary, in addition to the provision listed under policy H4, provision for disabled people may also include:

- Supported housing (of various degrees); and
- Accessible and adaptable homes.

6.150. The policy sets out that where the homes proposed as part of a development are suitable for both older people and disabled people (irrespective of age), the requirement may be combined to 30 homes suitable for older people and disabled people for developments of 150 homes and above or sites larger than 4ha (and a further 20 homes for each additional 200 homes thereafter). In these instances, it should be ensured that the resultant housing mix is appropriate for both groups.

6.151. As with policy H4, policy H5 also sets out that provision for disabled people must meet the design standards within policy D1 and the design principles outlined above.

6.152. The policy has been developed to ensure housing needs for disabled people can be met in the future, utilising our identified land supply as much as possible. The thresholds identified within the policy for new provision are considered suitable in terms of viability, as generally larger developments can support greater levels of additional costs, such as those associated with specialist housing provision. As stated in the policy, it is recognised that there may be some cross-over with the requirement for provision for older people under policy H4. As such, to support viability, the policy clarifies that the requirements can be combined where provision proposed is suitable for both older people and disabled people (and is not-age restricted).

6.153. A whole plan viability study will consider the policy requirements combined and as a whole to determine appropriateness. In any case, the policy requires that provision is delivered on these larger developments in line with local needs at the time of the application.

### **Policy H6 Homes for Children and Care Leavers**

6.154. The policy supports residential development for looked after children and care leavers. It sets our requirements for new provision including that new provision is:

- Is established in appropriate premises and in suitable, sustainable locations;
- Does not result in an undue concentration of provision for looked-after children in any particular area of the borough; and
- Gives priority to children and young people from the Oldham area in the first instance, in line with local needs.

6.155. With regards to criterion 2) the policy states that permission may not be granted where the proportion of children's residential care homes will result in such uses

representing 10% or more of properties within a 50m radius measured from the centre of the application site. In addition, no two adjacent properties apart from those that are separated by a road should be converted to children's residential care home uses. This is to ensure that there is not an over-concentration of a particular use within a defined area which may have detrimental effects on the amenity or character of an area.

- 6.156. In addition, the policy requires that applications for all children's residential care home uses are required to provide a Statement of Community Engagement and Impact Assessment and applicants should liaise with the council to ensure priority is given to children and young people in need in the first instance.
- 6.157. The policy has been developed to ensure that housing needs of children and care leavers are supported by the Plan. It seeks to ensure provision is located within appropriate premises and in sustainable locations and that levels of provision are carefully managed to maintain local amenity and character.

### Integrated Assessment

- 6.158. Policies H4 and H6 scored positive or neutral. No mitigation or enhancement was required to the policies as a result of the IA.
- 6.159. Policy H5 scored positive or neutral. The IA identified that in relation to objective IA17 (Accessibility) the policy reasoned justification could reference accessibility to key services and public transport to improve effectiveness. As such, reference was added to the policy reasoned justification to refer to accessibility and policies H1 and CO9.
- 6.160. Policies H4, H5 and H6 have been screened in by the HRA as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.

### Policy H7 Affordable Housing, Policy H8 Vacant Building Credit and Policy H9 Rural Exception Sites

- 6.161. Policies H7, H8 and H9 relate to the delivery of affordable housing and as such as considered together below.

### Feedback from Issues and Options consultation

- 6.162. The consultation responses at Issues and Options stage in relation to policies H7, H8 and H9 are summarised below.
- 6.163. In terms of affordable housing (policy H7), there was general support for providing affordable housing as part of developments. An option was provided within Issues and Options for affordable housing – asking whether an affordable housing requirement should be applied borough-wide or if there should be a different affordable housing requirement for different parts of the borough depending on need. In general, a mixed response was received in that some respondents agreed with a general borough-wide requirement, whilst some respondents commented that the amount to be provided should be flexible and/or based on specific local needs that may differ between areas in the borough.

- 6.164. Respondents noted that there will be a need to consider the viability implications of providing affordable housing in the balance with other policy contributions such as education, open space and biodiversity net gain. Some noted that exceptions could be made for the development of brownfield land within lower value areas.
- 6.165. In terms of the tenure split of affordable housing, some disagreed with the proposed split of 50% social and/or affordable rent and 50% intermediate tenure, noting alternative splits should be given, including a higher target for social housing / an evidence-led requirement determined at a ward level.
- 6.166. In terms of vacant building credit (policy H8), there were few comments received, however there was some support for a policy on vacant building credit as a way to encourage the re-use of vacant properties, including mill buildings.
- 6.167. Issues and Options did not specifically ask a question on rural exception sites (policy H9).

### Issues to be Addressed

- 6.168. In terms of policies H7, H8 and H9 the issues that need to be addressed through the Local Plan are set out below.

#### Affordable Housing

- 6.169. The LHNA identified a need for 203 affordable homes a year (net) across the borough. There is also a need for a mix of affordable housing tenure, including affordable rent, social rent and intermediate tenure.
- 6.170. There is an imbalance in the spatial distribution of affordable housing across the borough, 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.
- 6.171. 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.
- 6.172. Recognising the spatial differences highlighted above it is important to ensure that we provide the right type of affordable housing in the right places. Whilst it may be considered that there is a concentration of affordable housing in certain areas, these may not be the right type to meet local housing needs (for example large family sized affordable housing). The LHNA considered the supply and demand variations by area and property size, as is set out in the evidence base section below.
- 6.173. 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. As such there is a need to ensure a balance between developing difficult brownfield sites and providing affordable housing.

## Vacant Building Credit

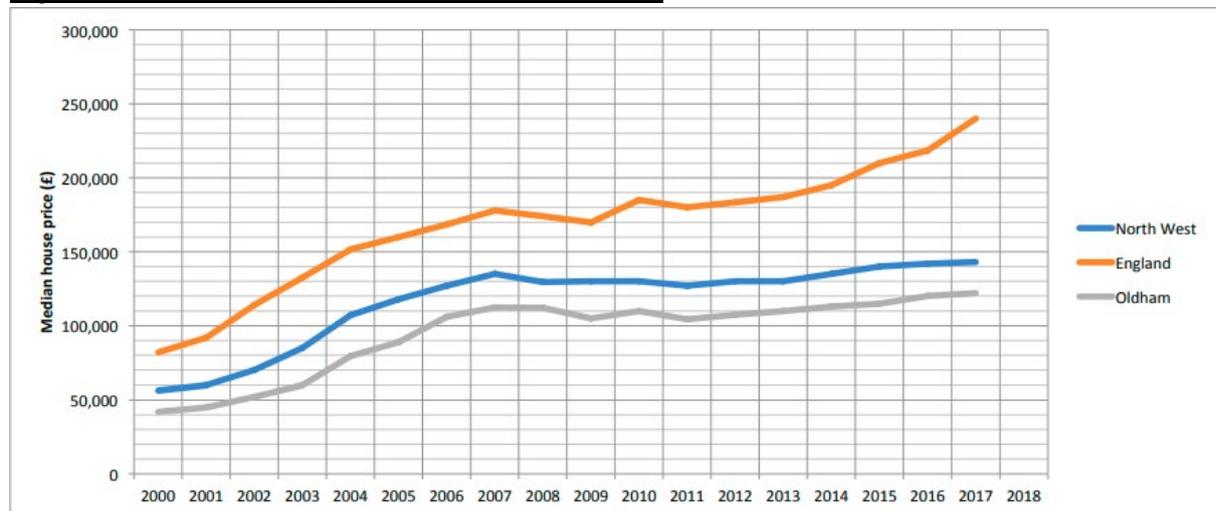
- 6.174. There are issues with viability and delivery of some sites within Oldham which need to be addressed to make sites more deliverable for residential development, especially in terms of brownfield sites in low value market areas.
- 6.175. Viability issues and limited funding means delivering large scale infrastructure, required for some large developments, is difficult, and can often lead to long determination times and limited contributions to other policy requirements.
- 6.176. As such, there is a need, where appropriate, to support the development of difficult brownfield sites, potentially by enabling lower policy contributions or negating policy contributions to support viability.

## Evidence Base

### Affordability of Housing

- 6.177. Evidence set out within the following section is mainly gathered from the LHNA. An update of the LHNA is currently underway and will provide an update to this data which will be provided at Publication Plan stage.
- 6.178. The LHNA found that income levels are lower in Oldham than in the Northwest or England. Median house prices in the borough have been consistently lower than those for the northwest region, and England as a whole as shown in figure 5<sup>39</sup>.

Figure 5: Median house price trends 2000 to 2017



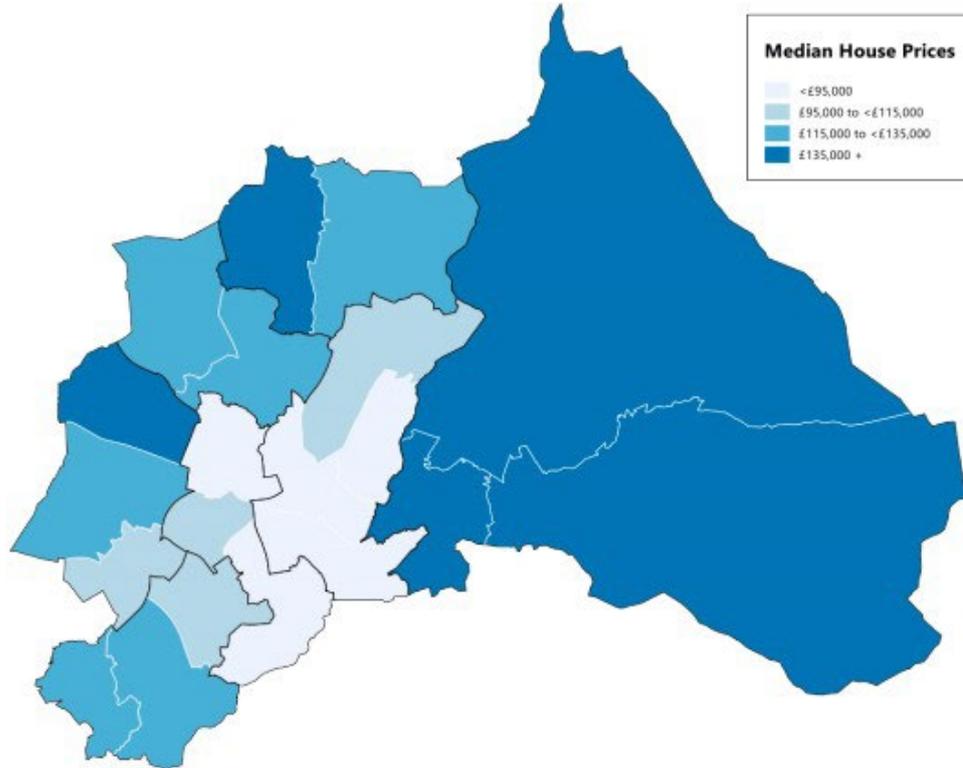
Source: Data produced by Land Registry © Crown copyright 2018

- 6.179. As shown in figure 5, following price stagnation and 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%.

<sup>39</sup> Source: Oldham LHNA 2019 (Data produced by Land Registry © Crown copyright 2018)

6.180. Figure 6 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 6: Median house prices by ward 2017<sup>40</sup>



6.181. In terms of the relative affordability of open market dwellings, 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 Northwest and England<sup>41</sup>.

6.182. The most recent affordability ratio (6.15), published by ONS in April 2022, indicates that Oldham's affordability has decreased compared to 2017. Oldham's affordability has been (on average) continually worsening since 2000.

6.183. The 2018 LHNA household survey found 8.8% of households would like to move but are unable to, the highest reason for which being that they cannot afford to move or there was a lack of suitable accommodation.

6.184. The LHNA identified the following in relation to geographical variances across the borough in terms of affordability:

- Saddleworth and Saddleworth villages - shortage of affordable housing; affordable housing considered best option to retain younger households in the area;

<sup>40</sup> Source: HM Land Registry data (© Crown copyright 2018)

<sup>41</sup> ONS Ratio of house price to residence-based earnings, 2017

- 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.

6.185. The PfE Strategic Viability Assessment tested the policies contained within the PfE Plan. The viability assessment identified five value areas across the plan area. It found that Oldham was made up of four value areas including:

- value area 1 (the highest value area, average new build housing price per sqm of £3,400-£4,930) which covered Saddleworth South;
- value area 3 (average new build housing price per sqm of £2,370-£2,770) which covered Saddleworth West and Lees, most of Chadderton South, Chadderton Central, Chadderton North, Royton North and Royton South, Shaw and Crompton, St James and Waterhead and Failsworth West;
- value area 4 (average new build housing price per sqm of £2,070-£2,370) which covered Failsworth East and Saddleworth North; and
- value area 5 (the lowest value area, average price per sqm of £1,293-£2,070) which covered the inner Oldham wards (Coldhurst, St Mary's, Hollinwood, Werneth, Alexandra and Medlock Vale).

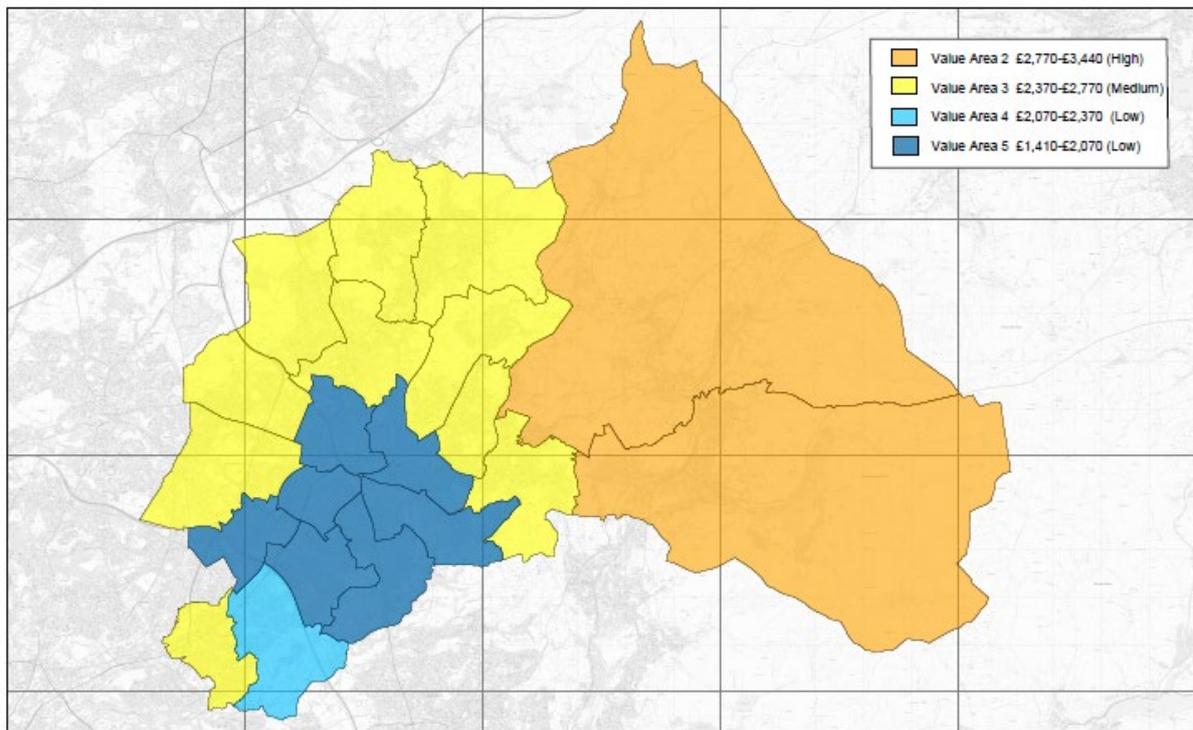
6.186. Viability work undertaken as part of Oldham's Mill Strategy (2021)<sup>42</sup> provided an amendment to the value areas identified as part of the PfE Strategic Viability Assessment. More localised analysis determined that Saddleworth North had been incorrectly scored as a lower value area (based on a lack of recent sales) however, house prices were in fact more aligned to those within Saddleworth South. It was considered that based on more recent data, Saddleworth North should be moved to value area 2 (average new build house price per sqm of £2,770-£3,440) and Saddleworth South should also be moved from value area 1 to value area 2 to align.

6.187. Figure 7 below identifies the amended value areas as identified as part of the Mill Strategy. This has informed the affordable housing zones set out within policy H7 in terms of the affordable housing requirement variation, which is based on value area.

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<sup>42</sup> Oldham's Mill Strategy (2021), section 6, pages 89-92, available at: [https://www.oldham.gov.uk/info/201236/evidence/2819/oldham\\_mills\\_strategy](https://www.oldham.gov.uk/info/201236/evidence/2819/oldham_mills_strategy)

Figure 7: Oldham Value Areas (as per Oldham's Mill Strategy 2021)



- 6.188. As figure 7 shows, inner Oldham is predominantly lower value, whilst the north of the borough, Failsworth West (which is close to the boundary with Manchester) and Saddleworth West and Lees (close to the higher value areas of Saddleworth) is within the medium value areas, and Saddleworth North and South are high value areas.
- 6.189. For the purposes of simplifying for the policy requirements, policy H7 identifies the high value areas (value area 2) as 'Affordable Housing Zone 1', the medium value areas (value area 3) as 'Affordable Housing Zone 2' and the lower value areas (value areas 4 and 5) as 'Affordable Housing Zone 3'.

## Affordable Housing Type and Tenure

6.190. Table 6 below sets out the definitions of housing tenure as is set out within policy H7.

**Table 6: Housing Tenure Definitions (as set out in policy H7)**

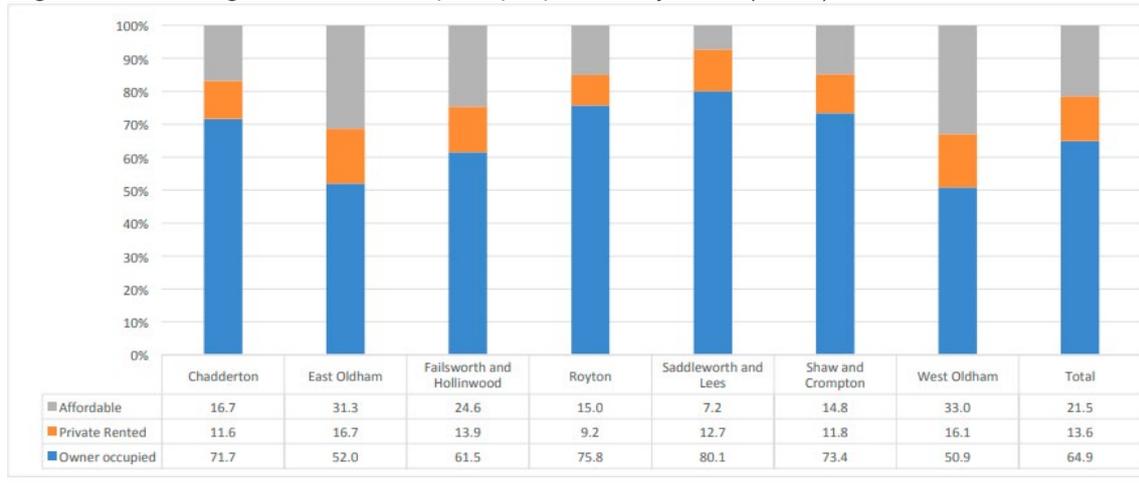
<b>Intermediate/ Shared Ownership</b>	<b>Affordable/ Social Rent</b>
<p>A form of discounted market sales housing that is sold at a discount of at least 20% below local market value<sup>43</sup>.</p> <p>Housing provided for sale that provides a route to ownership for those who could not achieve home 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). Eligibility is determined with regards to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.</p>	<p>Rent is set in accordance with the Government's rent policy for Affordable or Social Rent, or is at least 20% below local market rents (including service charges where applicable); the landlord is a registered provider, except where it is included as part of a Build to Rent Scheme (in which case the landlord does not need to be a registered provider); and 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.</p> <p>For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision.</p>

6.191. Figure 8 overleaf identifies the housing tenure of occupied properties by areas of the borough. 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.

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<sup>43</sup> First Homes are a specific kind of discounted market sale housing introduced by the government. They are a form of intermediate tenure housing, which meets the definition of 'affordable housing', as set out in national planning policy and should be sold at a discount of at least 30% below market value. First Homes should account for at least 25% of all affordable housing units delivered by developers through planning obligations. The criteria for First Homes are available at: <https://www.gov.uk/guidance/first-homes>

Figure 8: Housing tenure of occupied properties by area (2018)<sup>44</sup>



6.192. 64.9% of households are owner occupiers and a further 13.6% in private rented accommodation. An analysis of house prices indicates that open market housing has become more expensive in the borough in recent years, but prices are still below national and regional levels.

6.193. Of the 21.5% affordable housing stock in the borough, 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.

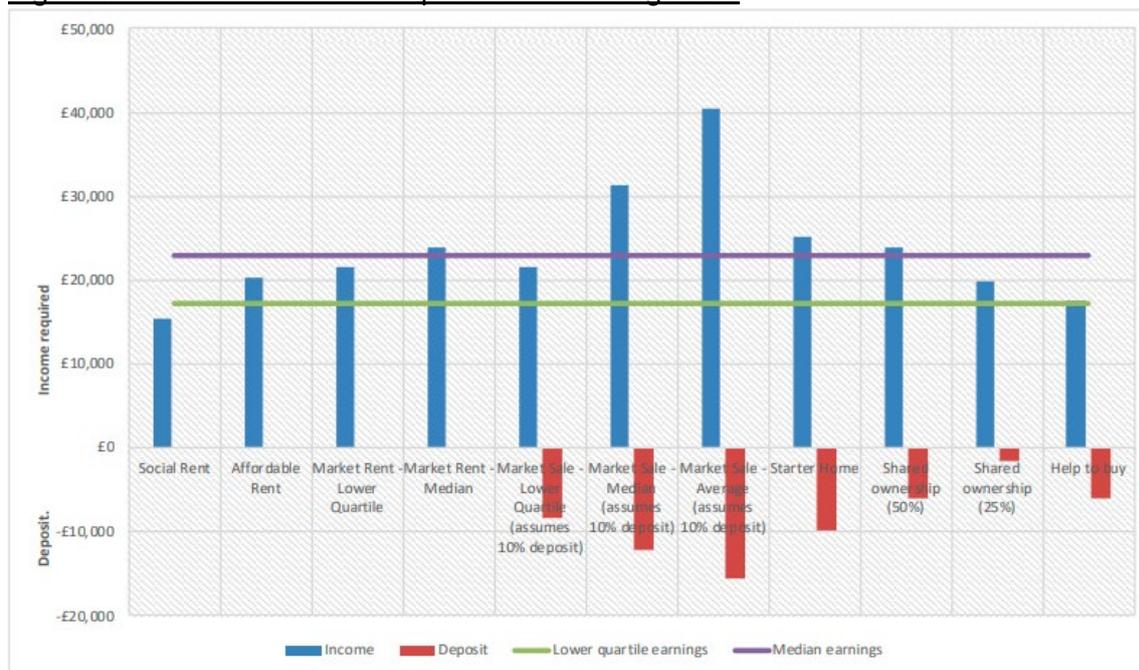
6.194. In terms of the potential to encourage higher-earning households currently living in affordable accommodation to consider intermediate tenure products, a 50% shared ownership product requires a household income of around £25,100. The 2018 household survey indicates that 5.7% of households in affordable 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 afford the transition from social rented to intermediate housing.

6.195. Figure 9 summarises in graphical form the relative affordability of alternative tenures at the borough level<sup>45</sup>. The figure sets out the income and deposit required for different options set against prevailing lower quartile and median earnings.

<sup>44</sup> Source: LHNA 2019 – Figure 4,3 ‘Household tenure by district’

<sup>45</sup> Source: Oldham LHNA 2019 (Data produced by Land Registry © Crown copyright 2018, Zoopla 2018, CLG, ASHE 2017)

Figure 9: Household income required and housing costs



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

6.196. Figure 9 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.

### Affordable Housing Need

6.197. 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 within Annex 2: Glossary<sup>46</sup>.

6.198. The LHNA identified that there were 10,173 existing households in need, representing 11% of all households. 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%)<sup>47</sup>.

6.199. 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.

<sup>46</sup> NPPF Annex 2 Glossary, available at: <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

<sup>47</sup> Source: LHNA 2019 - Table 5.2 'Households in need by district'

- 6.200. 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 will be updated as part of the LHNA update.
- 6.201. In identifying 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. This has informed the proposed tenure split set out within policy H7.
- 6.202. The LHNA has identified the property preferences of households in need by district, as set out in table seven. 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. 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. The housing mix requirement for affordable housing as is set out within policy H2 is informed by this data.

#### Vacant Building Credit

- 6.203. Vacant Building Credit or VBC is a national policy contained within NPPF. As set out above, the aim of VBC is to stimulate the development of vacant land by offering an incentive to reduce the amount of affordable housing that would be required as part of new development based on the amount of vacant floor space being converted/ re-developed. Requirements for the application of VBC is set out within policy H8 (outlined below at paragraphs 6.219-6.222) and reflects planning guidance (see paragraphs 2.43-2.45).
- 6.204. Oldham has several large buildings, including many mill buildings, which could become vacant in the future and if redeveloped could significantly contribute to housing delivery. It is in this context that the application of VBC may have a particular role to play in the delivery of affordable housing across the borough.
- 6.205. Oldham's Mill Strategy (2021) identifies the non-designated mills across Oldham which are of particular landscape and heritage value and sets out a robust strategy to ensure their sustainable future, which considers their potential for future development for residential, employment and other uses. It is also part of our positive approach to making the most efficient use of brownfield land and existing buildings, reducing the need for additional pressure on greenfield sites and reducing our carbon footprint. The reuse of mills can add to local distinctiveness as part of place making, attract investment and help retain Oldham's strong identity.
- 6.206. The Mill Strategy sets out policy recommendations for the conservation of the mill stock based on levels of priority relative to the landscape and heritage value of

individual mills. The strategy also sets out several actions to support the council in ensuring the sustainable future of the mill stock.

- 6.207. The Mill Strategy identified a total of 76 extant mills within Oldham. As per the assessment methodology, listed mills were excluded from the assessment of future use (employment, residential or other). As such 64 mills were assessed as part of the Strategy. The assessment categorised individual mills as high, medium or low priority based upon the landscape, heritage and housing / employment assessments.
- 6.208. In terms of housing potential, the assessment identified that 31 of the 64 mills that were assessed fell into the low category having regard to the range of criteria assessed, 25 into medium and the remaining 8 mills (Elm Mill, Lily Mills 1 and 2, Greenfield Mills, Jubilee Mill - Waterhead, Jubilee Mill (Fulling – Shaw), Prince of Wales Mill and Thornham Mill) were assessed as high in terms of housing potential. Several of these sites have planning permission for housing (Elm Mill, Lily Mills and Thornham Mill) and/or are identified within the council's housing land supply.
- 6.209. The assessment highlights the challenge of developing mills, noting that many of the borough's mills are located within the lower value areas and can be challenging buildings to convert or redevelop due to several factors, including their employment or industrial legacy and particular building characteristics, such as materials, design and significant floor areas. As such the viability and market challenges are not underestimated.
- 6.210. In this context, one of the recommendations of the Mill Strategy is to consider relaxing affordable housing contributions and other planning obligations, which can significantly impact on the delivery of such schemes, subject to appropriate viability testing.

#### Rural Exception Sites

- 6.211. As set out above, rural exception sites should only be used to meet an identified local affordable housing need or address an area-specific shortfall of affordable housing.
- 6.212. There are several rural areas in the borough, including parts of Saddleworth. Saddleworth in particular has been identified within the LHNA as having a 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.

## Proposed Policy Approach and Reasons

### Policy H7 Affordable Housing

6.213. Policy H7 sets out that residential development of 10 dwellings or more must provide affordable housing as part of developments, the proportion of which is set out within the policy. In line with feedback provided on the Regulation 18 Issues and Options consultation, the requirement is variable depending on which value area the development site is located within. Table 7 below identifies the policy requirements.

Table 7: Policy H7 Affordable Housing Requirements

Size of Scheme (homes/hectares)	% Affordable Homes Required Zone 1	% Affordable Homes Required Zone 2	% Affordable Homes Required Zone 3
10-24 homes	At least 15% on site provision. Option of financial contribution for offsite provision for sites of 10-15 homes.	At least 12% on site provision. Option of financial contribution for offsite provision for sites of 10-15 homes.	At least 10% on site provision. Option of financial contribution for offsite provision for sites of 10-15 homes.
25-149	At least 20% on site provision.	At least 15% on site provision.	At least 12% on site provision.
150+ homes	At least 30% on site provision.	At least 20% on site provision.	At least 15% on site provision.

6.214. As set out in table H7 above, the evidence identified that in terms of value areas, there is a general consideration that higher value areas can support more planning obligation costs (as market sales values tend to be higher), and may also be where affordable housing need is greatest (due to higher house prices) compared to lower value area, it was considered appropriate to require developments located within the medium and high value areas (identified as zones 1 and 2) to provide more affordable housing compared to the lower value areas (identified as zone 3). Lower value areas also tend to have higher amounts of affordable housing, sometimes due to previous housing renewal or affordable housing programmes, and to improve market values, there may be a need to diversify the housing stock and provide more market housing in these instances, rather than more affordable housing.

6.215. In terms of affordable housing tenure, the policy is informed by the LHNA evidence of affordable housing needs within the borough. The LHNA recommended that an affordable housing tenure split of 50% intermediate tenure and 50% affordable and social rent should be provided as the development's affordable housing contribution. As such the policy sets out the following affordable housing tenure split:

- 50% intermediate tenure;
- 25% social rent tenure; and
- 25% affordable rent tenure.

6.216. The definitions of these tenures are prescribed within NPPF (Annex 2: Glossary – Affordable Housing Definition). It is considered that to meet identified local housing needs a prescribed split is appropriate, however it was felt that a differing tenure

requirement by area, or according to specific local housing need, within the policy would be overly complicated and unnecessary. Instead, the policy allows for flexibility whereby in certain circumstances, such as to fulfil a funding requirement or meet an identified local need in a particular area, an alternative tenure split or mix to that set out in the policy (and policy H2) may be acceptable. The applicant is required to fully evidence an alternative tenure split or mix, considering local affordable housing needs. Any proposed alternatives will be agreed with the council at planning application stage.

6.217. The policy goes on to set out further clarifications and requirements including that:

- Developments should seek to provide affordable housing onsite in the first instance. However, by exception, it may be more appropriate, in meeting local needs for the payment of a commuted sum/ developer contribution to off-site provision, or a mixture of onsite/off-site provision;
- The value of any commuted sum/ developer contribution shall be calculated in negotiation with the council and a registered affordable housing provider. Where appropriate, affordable housing will be secured in perpetuity to retain the benefits of affordability for initial and subsequent owners and occupiers. This will be secured by conditions or planning obligations; and
- The affordable homes provided will be offered to those on the council's affordable housing need register in the first instance and in line with the local authority's local connection test, to ensure the affordable homes provided help to address the borough's affordable housing need.

6.218. In addition, considering viability and other factors which may impact the delivery of affordable housing, the policy sets out exceptional circumstances to providing the full amount of affordable housing required (either on or off-site). It states that the following exceptions may be acceptable, at the council's discretion on a case-by-case basis:

- There is a high level of existing affordable housing and there is a need to diversify the housing offer in a particular location (to be agreed with the council);
- It has been clearly demonstrated that all practicable options have been exhausted for delivering the minimum affordable housing requirement, including by partnering with registered providers and accommodating affordable homes financed through various sources such as Homes England, investment funds and commuted sums from other sites; and
- Developments which involve the conversion of a vacant building, such as mills, in line with the criteria identified within Policy H7, to support viability.

6.219. As set out above, the policy has been developed in line with available evidence of local affordable housing needs. It considers the implications of market variables and viability and is flexible in its approach where an alternative requirement can be evidenced or exceptional circumstances apply.

## **Policy H8 Vacant Building Credit**

6.220. The policy sets out the local requirements for the application of VBC. In line with PPG, the policy states that, within Oldham VBC will apply in the following circumstances:

- The site must meet the definition in national planning policy of ‘Previously Developed Land’;
- The building must meet the council’s definition of a ‘Vacant Building’ and must not have been abandoned (see below). 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 reasons; and
- If the proposal is covered by an extant or recently expired planning permission for the same, or substantially the same, development or there has been an application submitted but not determined since the VBC was reintroduced and VBC not sought, VBC will not apply.

6.221. It also identifies local requirements, including that a site which has last been used for employment purposes must also meet the requirements for redevelopment as set out in policy E2 of the Local Plan, regardless of whether the building is now vacant.

6.222. In terms of application requirements, the policy ensures that to apply VBC, a VBC Statement must be submitted alongside a planning application. The Statement must evidence that the circumstances listed above, in criterion 1 to 4, have been complied with and also provide information on the existing Gross Internal Floor Area (GIFA) and the proposed GIFA.

6.223. The policy reasoned justification also provides further clarification in terms of the definition of a ‘vacant building’ and an ‘abandoned building’.

6.224. The policy has been developed in line with national policy and guidance. It supports the delivery of vacant buildings which can be an important source of brownfield housing land, recognising that some vacant buildings can be challenging to redevelop, and therefore allowing a reduction in affordable housing requirements in line with the level of floorspace being redeveloped. The policy actions a recommendation within the Local Plan evidence base – the Mill Strategy – in terms of supporting the redevelopment of mill buildings with housing potential.

## **Policy H9 Rural Exception Sites**

6.225. The policy sets out that to meet local housing needs in rural parts of the borough, limited affordable housing for up to 5 homes will be permitted on sites within the Green Belt where it is accepted that there are no suitable alternative sites outside of the Green Belt to meet local need, and:

- The proposal would help to address an identified local need for affordable housing, including type and tenure specifications as set out within Policy H7;

- The site is physically well related to a built-up part of a settlement and the facilities it provides;
  - The affordable housing provided is made available solely to people in local housing need at an affordable cost for the life of the property (the council will ensure that any planning permission granted is subject to appropriate conditions and/or planning obligations to secure its affordability in perpetuity); and
  - The scheme is of a scale and design appropriate to its immediate surroundings and is sympathetic to the local area.
- 6.226. To ensure that the policy contributes towards the delivery of affordable housing to meet local affordable housing needs, it goes on to require that the affordable homes provided on rural exception sites be offered to those on the council's affordable housing need register in the first instance and in line with the local authority's local connection test.
- 6.227. The need for affordable housing across the borough, and particularly within rural areas of the borough, is identified within the evidence base. The policy has been developed to support the delivery of affordable housing to meet needs within rural parts of the borough in accordance with national planning policy and where proposed sites would comply with the policy requirements and in line with identified local needs.

### Integrated Assessment

- 6.228. Policies H7 and H8 scored positive or neutral. No mitigation or enhancement was required to the policies as a result of the IA.
- 6.229. Policy H9 scored mixed in that it scored mostly positive or neutral against the objectives, however some uncertain scores and one negative score was given. The negative score was given in relation to IA6 (ensuring effective use of brownfield land) as rural exception sites are likely to be in the Green Belt and possibly including greenfield sites. However, as mitigation, the requirements within policy OL2 would need to be met where applicable to any rural exception sites. No mitigation or enhancement was required to the policy as a result of the IA.
- 6.230. Policies H7 and H9 have been screened in by the HRA as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects. Policy H8 has not been screened in by the HRA.

## Policy H10 Houses in Multiple Occupation

6.231. Policy H10 Houses in Multiple Occupation (HMOs) sets out the policy for the development of HMOs within the borough.

### Feedback from Issues and Options consultation

6.232. In terms of HMOs, Issues and Options sought feedback on a spatial policy option and one question. The spatial option asked about the introduction of an Article 4 direction to remove permitted development rights for HMOs either in specific areas, as necessary or borough-wide, if there was found to be an over-concentration within a particular area. The question asked whether specific criteria for the development of new HMOs should be set out in policy to ensure HMOs meet appropriate standards, and if so, what should these criteria include.

6.233. Feedback in relation to the question was limited, however there was agreement that specific criteria and standards should be applied, such as the number of people in spaces and size of rooms and the number of people in shared living space.

6.234. In terms of the spatial option, feedback was more extensive. Many respondents requested that the introduction of an Article 4 direction is considered to remove permitted development rights for the conversion of properties in Oldham in to HMOs. Respondents noted that conversions to HMOs have changed the nature of neighbourhoods, have removed large family homes which are needed and have led to increases in crime, parking issues and noise disturbance. Several comments also noted particular issues within Failsworth.

6.235. It was also commented that HMO applications should be accompanied by a Statement of Community Engagement and risk assessment, and that as a planning condition, applicants should be required to consult with local residents and groups.

6.236. Some respondents noted that whilst there is a need for affordable housing, HMOs are not an appropriate housing option and there is a need for the provision of semi-supported accommodation (e.g community-led or funded transition accommodation).

### Issues to be addressed

6.237. In terms of policy H10, the issues that need to be addressed through the Local Plan are set out below.

6.238. HMOs can be a key source of affordable housing provision and provide housing for particular groups, such as students, single-person households, key workers etc. As set out above, there is a need to provide housing to meet particular local needs, including affordable housing and smaller housing options.

6.239. Many HMOs within the borough are privately rented. 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.

6.240. There are issues of overcrowding in some of Oldham's neighbourhoods and an increased need for larger inter-generational family housing. Large family homes may however be lost by the conversion to HMOs and as such this needs to be considered.

6.241. There is a need to ensure HMOs provide appropriate and high-quality living standards and that these homes are well managed. There is also a need to ensure that HMOs are suitably located, close to key services and public transport, and do not change the character of an areas or negatively impact on local amenity.

## Evidence Base

6.242. A house in multiple occupation (HMO) is defined as 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. HMOs can provide various types of accommodation including bedsits, a hostel, private halls of residence, a shared house, a block of converted flats and individual shared self-contained cluster flats.

6.243. HMOs can be a valuable source of housing to meet the local housing needs of various groups, including students, young adults and people with disabilities. They also provide smaller and affordable accommodation which has been identified as being required in the borough. However, there is also a need for larger family housing. As such it is important that large family homes are not extensively lost to subdivision as a result of HMO development. Furthermore, extensive concentrations of HMO development can result in amenity issues and change the character of an area.

6.244. An analysis of HMOs within the borough is currently being carried out as part of the LHNA update and this will inform the policy at Publication Plan stage as appropriate. Recent evidence gathered to inform the LHNA update has found that there are approximately 369 HMOs within the borough as of October 2023<sup>48</sup>, representing 0.37% of the borough's total housing stock (98,567 dwellings as of October 2023).

6.245. In the meantime, evidence on HMOs was gathered to inform Issues and Options and is summarised below. This will be updated to reflect the findings of the LHNA

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<sup>48</sup> Please note this information has been gathered from a variety of sources, using several internal monitoring systems. Given the volume of data and data handling practices there may be some level of inaccuracy. As such the data should be considered as approximate and treated with caution.

and further monitoring, however it is still considered to be a useful indication of HMO trends within the borough over a defined period (2010-2020).

- 6.246. At December 2020, there were 306 HMOs identified within the borough<sup>49</sup>, representing 0.31% of the borough's total dwelling stock (97,079 dwellings as of October 2020). Analysis has shown that most HMOs approved within Oldham over the period of 2010-2020 were formerly homes (as opposed to other uses), with over half involving the change of use of small/medium terraced housing. In some cases the conversion of these homes into smaller single units as HMOs means the loss of a family home, potentially in areas of need, but may also be leading to overcrowding and poor living conditions. Conversely however, these conversions to HMOs have led to an increase in the number of single-occupation accommodation available within the borough, which the LHNA also found to be in limited supply, including within the private-rented sector.
- 6.247. There has been an increase in the number of HMOs being approved through the planning system with 85% of all HMOs granted permission/ approved over the period of 2010 to 2020, being granted/ approved within the four years of 2016/17 to 2019/20. Indeed, 33% of all HMOs granted permission/ approved between 2010-2020 were granted/ approved in 2019/20 alone. However, some developments relating to HMOs do not require planning permission and can currently be carried out under permitted development rights and as such won't be considered in the figures quoted above. Changes of use from dwelling houses to small HMOs (housing under 6 people) can be carried out under permitted development rights. Larger HMOs (for 6 people and above) require planning permission.

#### Location of HMOs

- 6.248. Over the past ten years most planning approvals / permissions for HMOs were located on sites within urban areas and town centres. West Oldham has significantly more recorded HMOs than any other district, with around a third of the borough's total being located in this district. Oldham Town Centre also has a significant proportion of HMOs, and significantly more than any other centre in the borough. This is to be expected somewhat given the services, high public transport accessibility and facilities located within the town centre. However, there remains a growing shortage of private-rented accommodation within Oldham Town Centre and a lack of affordable housing.
- 6.249. Initial evidence gathered for Issues and Options found that there did 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. There does however 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.
- 6.250. 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

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<sup>49</sup> See footnote 39.

within a defined area. Further work will be carried out by the LHNA update to understand if there are such issues within certain areas of the borough.

6.251. In terms of access to public transport, over half (157) of the borough's recorded HMOs were located within 800m of a Metrolink station and three are located within 800m of a train station (Moston, Mills Hill and Greenfield). There is little evidence to indicate that car usage amongst HMO residents is any different than that of private accommodation residents. 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. However, it is important to ensure HMOs are located sustainably with access to public transport within a suitable walking distance, 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

6.252. 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 its 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.

### Selective Licensing

6.253. The licensing of private rented properties has been happening in certain areas of Oldham since 2015. Following a recent comprehensive review and consultation, the council has determined that a new selective licensing scheme is required in 5 areas in Oldham, including specific areas within Alexandra, St Mary's, St James, Waterhead, Coldhurst, Werneth, Chadderton South, Hollinwood and Medlock Vale wards. This means that any privately rented properties (including HMOs) within these areas, will require a licence to operate from 4 July 2022. Maps of the specific areas and further information is available on the council's [website](#)<sup>50</sup>.

6.254. In addition to properties within the selected licensing areas, a licence is required for 'large' HMOs, 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).

6.255. As of October 2023, there were 78 licensed HMOs within the borough.

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<sup>50</sup> Oldham Council Selective Licensing Scheme, available at: [https://www.oldham.gov.uk/info/201198/help\\_for\\_landlords/1450/selective\\_licensing\\_of\\_private\\_landlords](https://www.oldham.gov.uk/info/201198/help_for_landlords/1450/selective_licensing_of_private_landlords)

## Proposed Policy Approach and Reasons

6.256. Policy H10 sets out that HMOs will be supported where the proposed development:

- Does not result in the loss of, or impact on the character or amenity to the area as a consequence of increased traffic, noise or general disturbance;
- Does not result in an undue concentration of HMO provision in any particular area of the borough - permission may not be granted where the proportion of HMOs (either C4 or Sui Generis) will result in HMOs representing 10% or more of properties within a 50m radius measured from the centre of the application site;
- No two adjacent properties apart from those that are separated by a road should be converted to HMOs; and
- Complies with the relevant design and amenity standards as outlined in Policy D1, and any future HMO standards developed by the council.

6.257. The policy also sets out that for the development of a HMO that requires a license, the applicant must meet the council's requirements, as set out on the council's website<sup>51</sup>, and all applications for HMOs are required to provide a Statement of Community Engagement and Impact Assessment.

6.258. The policy also supports HMOs within Oldham Town Centre due to its accessible location. However, recognising the need to protect the core functions and character of Oldham Town Centre, applications for HMOs in this location will be considered in line with the criteria listed above and in addition, within the town centre HMOs should not occupy ground floor uses, unless the proposed development would comply with the exceptions listed in policy C4 'Changes of use and redevelopment within the borough's centres'.

6.259. The policy has been developed in line with the evidence base and the responses to Issues and Options consultation. It primarily seeks to support the development of high-quality HMOs within appropriate locations, whilst seeking to ensure the number of HMOs does not result in an undue concentration within a particular area, which could impact on the character or amenity of an area. The thresholds identified within the policy are considered acceptable in terms of representing a reasonable distance (50m is usually 2 streets) and proportion (for the average street 10% represents a limited number of dwellings, usually 1 or 2) to ensure that an undue concentration does not occur and lead to a wider impact on the local neighbourhood. In some circumstances, it may be acceptable for exceptions to the thresholds to apply, this will be considered on a case-by-case basis.

6.260. Sometimes community perceptions of HMOs can be negative. Through the requirement for applications for HMOs to provide a Statement of Community Engagement and Impact Assessment, the policy seeks to ensure that developers/ applicants consider the potential impact and engage with the community to alleviate

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<sup>51</sup> At the following webpage:

[https://www.oldham.gov.uk/info/201198/help\\_for\\_landlords/258/houses\\_in\\_multiple\\_occupation](https://www.oldham.gov.uk/info/201198/help_for_landlords/258/houses_in_multiple_occupation)

concerns or issues before they arise, therefore aiming to foster more positive perceptions and outcomes in relation to HMO development.

### Integrated Assessment

6.261. Policy H10 scored either positive or neutral. No mitigation or enhancement was required to the policies as a result of the IA.

6.262. The policy has been screened in by the HRA as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.

### Policy H11 Custom/ Self-Build and Community-led Housing

6.263. Policy H11 sets out the policy for custom-build, self-build and community-led housing development.

### Feedback from Issues and Options consultation

6.264. In relation to custom-build, self-build and community-led housing, Issues and Options asked several questions, including:

- whether specific allocations should be identified for self and custom-build;
- should self and custom-build plots be required on all residential developments over a certain threshold, and if so, what should this threshold be (e.g. 50 homes and above or 100 homes and above or 200 homes and above); Or
- should self and custom-build plots be required on certain types of sites, e.g. council-owned land, strategic development sites etc or sites with the ability to have separate accesses for self and custom build elements? Or
- should the policy set out that self and custom-build plots be provided on sites only in certain areas of demand (and only for developments over a certain size); and
- should there be a time limit for sale/ delivery of self and custom-build plots to ensure appropriate delivery?
- In terms of community housing, Issues and Options asked whether there any sites you consider to be suitable which the Local Plan should identify?

6.265. In terms of responses, there was general support for encouraging self, custom-build and community-led housing through the planning system. Not all questions were explicitly answered by respondents, however several respondents commented that there should be specific allocations identified, however some noted that this should only be in areas of demand and not on green land or in areas of flood risk.

6.266. Several comments were raised in relation to the viability and delivery of self and custom build plots, including that requiring the provision of a certain percentage of self and custom build plots as part of wider development sites impacts on the developments economic viability and adds to the complexity and logistics of

development and may lead to the slower delivery of homes. There also needs to be consideration given to the delivery of infrastructure on such sites, to ensure coordinated provision. Some respondents suggested that large development sites have the greatest capability to provide self and custom build plots, such as those over 100 homes.

6.267. Most respondents commented that there should be a time limit for sale/ delivery of self and custom build plots to ensure appropriate delivery.

### Issues to be addressed

6.268. In terms of policy H11, the issues that need to be addressed through the Local Plan are set out below.

6.269. There is a need to provide a range of house types, including opportunities for those individuals or groups wishing to build their own homes, to ensure Oldham has an attractive and varied housing offer. Oldham's Housing Strategy sets out a commitment to supporting self-build, custom-build and community-led housing development.

6.270. The council is required to maintain a self and custom build register of individuals or groups seeking plots to build their own homes within the borough. As required by national policy, there is a need to give enough permissions to suitable development to meet the demand for plots as identified on the register.

6.271. Self and custom build and community-led housing provide opportunities for the delivery of affordable housing. There is a need to provide affordable housing across the borough.

### Evidence Base

6.272. The most recently submitted data, submitted to DLUCH in February 2022, is for the base period 31 October 2021 to 30 October 2022. During this period 78 individuals were added to the register, making the total number of entries at the end of this base period 506 individuals.

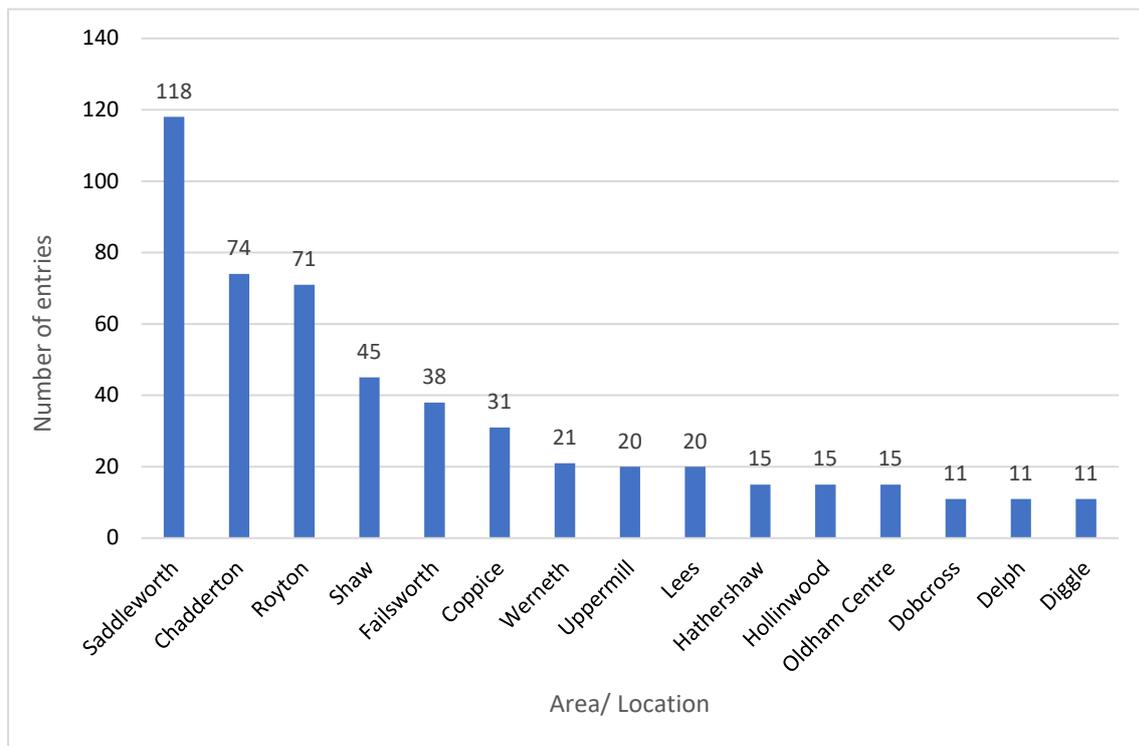
6.273. At the end of each base period, authorities have 3 years in which to permission an equivalent number of plots of land, which are suitable for self-build and custom housebuilding, as there are entries for that base period. At the base period of 31 October 2018 to 30 October 2019 there were 77 individuals added to the register. In the three years since this base period a total of 81 planning permissions has been granted on plots suitable for self and custom build. This is sufficient to meet the number of people on the register within the relevant base period, however each year the number of plots granted permission does not meet the number of people added to the register each year. This represents the challenge of granting permission for a sufficient amount of plots for self and custom build housing demand.

6.274. Data for 2023 has not yet been requested by DLUCH. As per the most recent base period (31 October 2022 to 30 October 2023) there are 535 entries (individuals) on the register in total. 31 individuals were added to the register during this base period. Data on granted permissions will be gathered in due course.

6.275. The LHNA update will provide further evidence in relation to the needs and demands for self and custom build and community-led housing within the borough. However, evidence relating to the most recent base period is set out below.

6.276. Analysis of the self-build and custom housebuilding register as at 30 October 2023 shows that out of the locations specifically mentioned by the entrant, Saddleworth is the most desired location for a plot, with 22% of entries citing Saddleworth as a desired location. All the main settlements of Uppermill, Greenfield, Delph, Denshaw, Diggle and Dobcross within Saddleworth were also cited specifically, however Uppermill is the most cited location within Saddleworth. Chadderton, Royton and Shaw are the next most cited locations for plots with 14%, 13% and 8% of entries respectively. Other areas with a notable number of entries stating it as a desired location for plots are Coppice, Failsworth, Lees, Werneth, Hathershaw, Hollinwood and Oldham Town Centre. Figure 10 shows the desired locations for self-build plots as per entries on the register (locations with 5 or more entries only)\*.

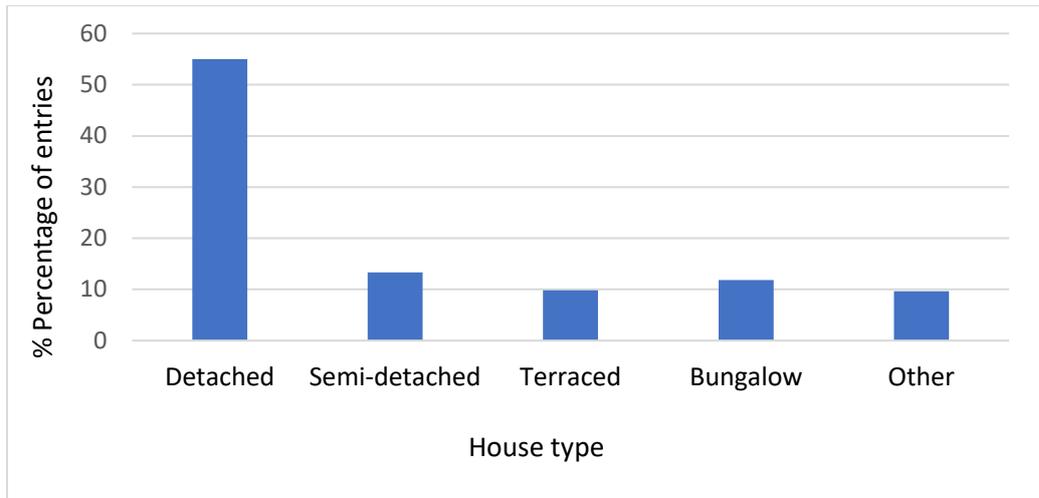
Figure 10: Desired Locations for Plots of Entries on Self and Custom Build Register<sup>52</sup>



6.277. In terms of house type, the majority of register entries (55%) specify 'detached' properties as the desired house type. Figure 11 sets out the desired house types by entry:

<sup>52</sup> A number of entries specified more than one area - these have been counted individually as per each area specified.

Figure 11: Desired House Types of Entries on the Self and Custom Build Register<sup>53</sup>



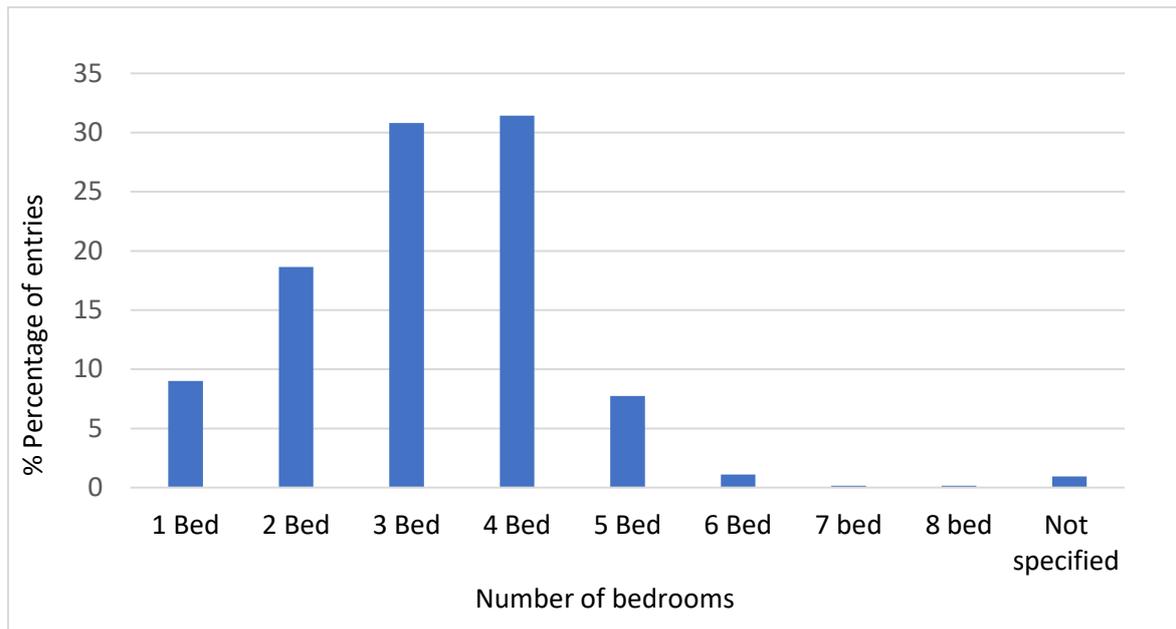
6.278. The above echo's the findings of the LHNA which show that property type preferences were highest for houses (42.3% of households would like a detached house), compared to flats, bungalows and other forms of dwellings.

6.279. Figure 12 sets out the number of bedrooms per property desired as per entries on the register. As figure 12 shows 31% of entries specify a desire for four-bedroomed properties (199) or three-bedroomed properties (30%). 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.

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<sup>53</sup> A number of entries specified more than one house type - these have been counted individually as per each house type specified.

**Figure 12: Number of Bedrooms Desired by Entries on the Self and Custom Build Register<sup>54</sup>**



6.280. Within each of most desired locations of Saddleworth, Chadderton, Royton and Shaw detached properties with 3 or 4 bedrooms are the most desired house type/size. This correlates with findings of the LHNA, which found that for Royton and Shaw more three-bed homes are required and for Chadderton 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.

6.281. 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, but also affordable housing need is high within Saddleworth. This could reflect that building a home is more accessible to those on a higher income, or conversely, could be evidence of a need for a type of housing that is not met by the current market (or available at a price which is affordable).

### Proposed Policy Approach and Reasons

6.282. Policy H11 has been developed in line with national policy and the available evidence. It sets out that supply of suitable sites/ plots for prospective custom builders, self-builders and community led housing groups will be secured by:

- Supporting planning applications for custom, self-build and community led housing where this is consistent with other planning policies; and
- Ensuring developers contribute to the supply of plots available for custom, self-build and community led housing as part of their development.

<sup>54</sup> A number of entries specified more than one bed size/number- these have been counted individually as per each bed number specified.

- 6.283. The policy states that in areas identified as having evidenced demand for self or custom build, residential developments with a capacity of 50 homes and above must provide 2% of the total site units for self or custom build. Developers should ensure that the plots are actively marketed at an appropriate price, and the information be provided to the council to be distributed to all appropriate individuals on the Self-Build and Custom Housebuilding Register. To ensure efficient delivery, as was commented on at Issues and Options, the policy states that where a custom, self-build or community led plot(s) has not been purchased after being actively marketed at an appropriate price for a period of 12 months, the developer can choose to continue to market the plot(s) or develop the plot themselves, to be integrated into the rest of the development. Also planning permission for developments which include custom, self-build and community led housing plots should include conditions requiring these plots to be completed within 3 years of the custom, self-builder or community led housing group purchasing the plot. Exceptions may apply for community-led housing schemes where there are several plots to be delivered.
- 6.284. To support the viability of providing self, custom build and community led housing, as is identified as an issue, any plots provided for custom, self-build and community led housing whether as part of a wider development site or individually will be exempt from affordable housing contributions. Exemptions from other policy contributions may apply in order to support delivery.
- 6.285. In terms of the threshold of residential developments with a capacity of 50 homes and above having to provide a minimum of 2% of the total site units for self, custom build or community-led housing, this is considered appropriate in terms of capturing a large number of sites that are of a scale capable of supporting an appropriate number of developments plots suitable for self and custom build and community-led housing. Also it is considered that the policy recognises the challenges of delivering self and custom build and community-led housing plots as part of wider development sites, and therefore supports the development of this housing on individual sites should they come forward.
- 6.286. Some of the site allocations identified through the Local Plan may also be suitable for self and custom build and community-led housing. This will be considered further at Publication Plan stage.

### Integrated Assessment

- 6.287. Policy H11 scored either positive or neutral. No mitigation or enhancement was required to the policies as a result of the IA.
- 6.288. The policy has been screened in by the HRA as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.

## Policy H12 Gypsies, Travellers and Travelling Show People

6.289. Policy H12 sets out the policy for pitch provision for gypsies, travellers and travelling show people.

### Feedback from Issues and Options consultation

6.290. Issues and Options set out that further research would be undertaken as appropriate to understand the needs for gypsies, travellers and travelling showpeople and inform preparation of the Local Plan. As such, no views were sought on specific questions/ options and no relevant consultation feedback was provided. An update of the [Greater Manchester Gypsy and Traveller Accommodation Assessment](#)<sup>55</sup> (GTAA), most recently published in 2018, will be carried out in 2024 and will inform the policy as appropriate at Publication Plan stage.

### Issues to be addressed

6.291. In relation to policy H12, there is a need to consider the housing needs of all sections of the community through the Local Plan, including the accommodation requirements of gypsies, travellers and travelling showpeople, as is required by national planning policy.

### Evidence Base

6.292. The 2018 GTAA identified no need for pitches or plots for gypsies, travellers and travelling showpeople in Oldham. A total of 59 transit pitches are required across Greater Manchester.

6.293. As set out above, an update of the GTAA is being undertaken and should it identify the need for pitches within Oldham the council will seek to identify a suitable site(s) as part of the Publication Plan.

### Proposed Policy Approach and Reasons

6.294. Policy H12 has been developed in line with national policy and available evidence, in that it does not identify particular sites, but rather supports the identification of suitable sites should a need be identified and sets out a series of criteria to ensure provision is sustainable and appropriate, as follows.

6.295. The policy sets out that when allocating sites and determining planning applications, the council will ensure the following criteria are satisfied:

- it is consistent with national and local guidance and policies;
- protects the residential amenity and safety of current and future occupiers and those living nearby;
- there is safe and convenient vehicular and pedestrian access to the road network and provision of on-site parking, turning and servicing;

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<sup>55</sup> This document can be found at: [greater-manchester-gypsy-and-traveller-and-travelling-showperson-accommodation-assessment-update-2018.pdf](#) ([greatermanchester-ca.gov.uk](#))

- it is located within or near existing settlements, with public transport, local services and facilities accessible to the development by active travel;
- the site is able to provide adequate pitch sizes, on-site facilities and to make provision for a mix of uses, where appropriate; and
- it has access to, or can be linked to, appropriate infrastructure that is required to meet the needs of the occupiers (including facilities for sewage and waste disposal, water, power supplies and drainage).

6.296. As such, the council will utilise this criteria should the updated GTAA identify a need for the Local Plan to allocate sites for gypsies, travellers and travelling showpeople.

### Integrated Assessment

6.297. Policy H12 scored either positive or neutral. No mitigation or enhancement was required to the policies as a result of the IA.

6.298. The policy has been screened in by the HRA as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.

### Policy H13 Housing and Mixed-Use Allocations

6.299. Policy H13 sets out the proposed housing and (residential led) mixed-use allocations within the Draft Local Plan.

### Feedback from Issues and Options consultation

6.300. In relation to allocations for housing development, much of the feedback provided to the other housing policy questions (as set out within this topic paper – section 6) is relevant and is considered in the various policy sections above. Also, general feedback was provided on how the Local Plan can deliver housing which is also relevant and is considered below.

6.301. Issues and Options also specifically asked several questions related to allocations for housing, including whether respondents had any views on any of the saved UDP housing and mixed-use allocations (which had not been built out)<sup>56</sup>. In addition, for respondents were asked to submit the details of any other sites in the borough that may be suitable for housing.

6.302. In terms of general responses, there was general support for identifying allocations for housing to meet housing needs. Some respondents noted that there is a need to provide allocations of all sizes, especially large sites which are more attractive to volume housebuilders. Many respondents supported the development of brownfield land for housing development rather than development of greenfield land or land with ecological value.

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<sup>56</sup> See Oldham Local Plan Review: Issues and Options (2021), table 4 'Remaining Saved UDP Housing and Mixed Use Allocations', pages 62-63, available at: [https://www.oldham.gov.uk/info/201233/local\\_plan\\_review/1809/issues\\_and\\_options](https://www.oldham.gov.uk/info/201233/local_plan_review/1809/issues_and_options)

- 6.303. In terms of responses to the specific allocation questions outlined at paragraph 6.301, some respondents noted concerns regarding the deliverability of the Saved UDP allocations, noting lack of developer interest and heritage issues.
- 6.304. It was also noted that new sites should be allocated instead, giving consideration to potential site constraints and neighbouring uses. In addition, various sites were submitted for consideration – these are listed within the [Issues and Options Comments and Responses Schedule \(December 2023\)](#)<sup>57</sup>.

### Issues to be addressed

- 6.305. In relation to policy H13, there is a need to ensure that housing is delivered to meet our housing requirement and particular local housing needs, including providing a mix of housing types and tenures, across the borough. There is also a need to ensure that the Local Plan supports the delivery of housing through council's Creating a Better Place programme and our residential pipeline.
- 6.306. Site allocations provide the opportunity to better shape development, ensuring housing is delivered in line with a wider spatial strategy and meets the needs of residents, whilst ensuring that aspects such as design, open space, social infrastructure and transport requirements, are considered and accommodated as part of development.

### Evidence Base

- 6.307. The [Site Allocations Background Paper](#)<sup>58</sup>, prepared to support the Draft Local Plan, sets out the approach taken to identify the potential site allocations within policy H13 and collates the evidence used. The policy approach will be considered later, however the following provides a summary of the evidence which is contained within the background paper, and other relevant evidence to policy H13.
- 6.308. As set out at paragraphs 6.20-6.24 of this topic paper, Oldham's housing requirement (the number of new homes needed) is set out in PfE. PfE sets out that Oldham is required to deliver 11,560 homes over the period of 2022-2039, which equates to an average of 680 homes per year. The housing requirement is phased through a stepped requirement as follows:
- 2022-2025 - 404 homes required annually
  - 2025-2030 - 680 homes required annually
  - 2030-2039 - 772 homes required annually
- 6.309. PfE identifies our housing land supply over the plan period 2022 to 2039, supplemented by the strategic allocations identified within PfE set out at paragraph 3.13 of this topic paper<sup>59</sup>. The land supply is made up as shown in table 8.

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<sup>57</sup> See Issues and Options Comments and Responses Schedule (December 2023), table 14 'Responses submitted on the Homes Chapter – Housing and Mixed-Use Allocation's Question', pages 57-62, available at: [https://www.oldham.gov.uk/info/201233/local\\_plan\\_review/3095/draft\\_local\\_plan](https://www.oldham.gov.uk/info/201233/local_plan_review/3095/draft_local_plan)

<sup>58</sup> Available at: [https://www.oldham.gov.uk/info/201233/local\\_plan\\_review/3095/draft\\_local\\_plan](https://www.oldham.gov.uk/info/201233/local_plan_review/3095/draft_local_plan)

<sup>59</sup> See also PfE, Chapter 11 'Oldham Strategic Allocations', available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/>

Table 8: Oldham Housing Land Supply Components

<b>Source</b>	<b>Number of Homes</b>
Strategic Housing Land Availability Assessment	10,283
Small Sites Allowance	923
Proposed PFE Strategic Allocations	1,980
<b>Total</b>	<b>13,186</b>

6.310. The council's Strategic Housing Land Availability Assessment (SHLAA) database was used as the starting point for identifying the potential site allocations, which incorporates a range of data sources, such as council asset sites, sites with planning permission, Oldham's Brownfield Land Register, Oldham's Mill Strategy etc. Further detail on the sources used is provided within table 7 of the Site Allocations Background Paper<sup>60</sup>.

6.311. At Issues and Options stage, several spatial options were assessed, including identifying reasonable alternatives, for the identification of potential housing and mixed-use allocations. Two options were appraised for the identification of housing allocations, as follows:

- Option A: Should Oldham focus the identification of housing allocations within the urban area – in Oldham Town Centre, the borough's other centres, key public transport corridors, on previously developed land, vacant and under-utilised buildings (including the reuse of employment sites and mills, where appropriate)?
- Option B: Should Oldham focus the identification of housing allocations within the urban area as in Option A, but also include within the scope open spaces (where identified as surplus to requirements through the council's open space study), land currently designated as Other Protected Open Land where it does not meet LGS criteria, and previously developed land in the Green Belt where this meets national planning policy.

6.312. Table 4 of the Site Allocations Background Paper<sup>61</sup> provides further detail on the assessment of the spatial options and reasonable alternatives. In summary, the IA of the housing allocation options showed at this stage generally there were more uncertainties around Option B, whilst Option A scored more positive overall. This informed the approach taken in identifying housing allocations as is set out below.

<sup>60</sup> Oldham Draft Local Plan – Site Allocations Background Paper, table 7, pages 10-13, available at [https://www.oldham.gov.uk/info/201233/local\\_plan\\_review/3095/draft\\_local\\_plan](https://www.oldham.gov.uk/info/201233/local_plan_review/3095/draft_local_plan)

<sup>61</sup> Oldham Draft Local Plan – Site Allocations Background Paper, table 4, page 5, available at [https://www.oldham.gov.uk/info/201233/local\\_plan\\_review/3095/draft\\_local\\_plan](https://www.oldham.gov.uk/info/201233/local_plan_review/3095/draft_local_plan)

## Proposed Policy Approach and Reasons

- 6.313. As set out above, two options (A and B) were appraised for the identification of housing allocations within the Draft Local Plan. Option B has been taken forward as it incorporates option A and makes the most of sites in the urban areas, whilst ensuring that we are identifying a sufficient variety of sites through the inclusion of some greenfield sites where appropriate. Nevertheless, the majority of development that will come forward will be within the urban area and the release of open land would be the exception. If a greenfield site is identified within a council regeneration programme (e.g. the council's Residential Delivery Strategy) it has been considered, as deliverability is indicated by this work. In addition, some sites which are mixed (that is where they include greenfield and brownfield land) have also been considered. Previously developed land within the Green Belt is also considered where appropriate. Some of these sites may already benefit from an extant planning permission.
- 6.314. The approach of Option B is reflected in the potential housing allocations proposed in policy H13. The focus of the potential allocations is on brownfield land, particularly opportunities within Oldham Town Centre. Whilst recognising that it is important to identify a range of allocations across the borough that reflect the council's priorities and provide the opportunity to address local housing need through offering a range of scale, location and mix. Option A was therefore not solely taken forward as it would not in itself provide the same range of allocations.
- 6.315. The stages that have made up the approach to site selection for the potential housing and mixed-use allocations within policy H13 are set out in the Site Allocations Background Paper<sup>62</sup>. In summary, the stages are as follows:
- Task 1 – Identification of sites for consideration
  - Task 2 – Initial filtration of sites for consideration
  - Task 3 – Collection of data for detailed desktop assessment
  - Task 4 – Detailed site assessment stage (incorporating, task 4a desktop assessment, task 4b planning history check, task 4c site visits and task 4d internal consultation).
  - Task 5 – Identification of potential allocations.
- 6.316. The approach and methodology summarised above has informed policy H13. Policy H13 sets out the proposed allocations for housing, including those part of a mixed-use allocation. The allocations proposed are within the existing urban area.
- 6.317. The allocations are listed within the policy and are split into three tables – table H6 sets out the proposed housing allocations under 1 hectare, table H7 sets out the proposed housing allocations 1 hectare and over and table 8 sets out the proposed housing allocations within Oldham Town Centre. Site proforma's for each of the proposed allocations are contained within the Draft Local Plan Appendix 2<sup>63</sup>.

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<sup>62</sup> See Section 5 and Figure 1 'Site Selection Methodology Process'.

<sup>63</sup> Oldham Draft Local Plan – Appendix 2 'Proformas for potential housing and mixed-use allocations', available at: [https://www.oldham.gov.uk/info/201233/local\\_plan\\_review/3095/draft\\_local\\_plan](https://www.oldham.gov.uk/info/201233/local_plan_review/3095/draft_local_plan)

- 6.318. In total the proposed allocations within policy H13 have the potential to provide 4,395 homes. The proposed allocations vary in size from small sites under 1 hectare to larger sites that are key to the delivery of our spatial strategy and Creating a Better Place. Sites of 1 hectare and above have the potential to provide around 3,243 homes.
- 6.319. In line with national planning policy to promote the development of a good mix of sites we have identified opportunities to accommodate at least 10% of housing requirement, that is 1,156 homes, on sites no larger than one hectare. The capacity of sites below 1ha provide the opportunity for 1,247 homes. Several of these fall within Oldham Town Centre and whilst small they are proposed to provide a significant amount of housing due to being proposed as part of higher density development.
- 6.320. 1,805 homes are identified on sites within Oldham Town Centre. These will generally be delivered as part of mixed-use development, supported by complimentary uses at ground floor level and social infrastructure. These will directly support the spatial strategy and Creating a Better Place, as is noted within the policy wording.
- 6.321. The capacity assumptions identified for the allocations in policy H13 are informed by the developable area not total site area and the indicative density presented is that which would be applied to the site in accordance with policy H3 'Density of New Housing'. Capacity and density assumptions are indicative and may be subject to change as we carry out further evidence to support preparation of the Publication Plan.
- 6.322. The housing allocations within the Draft Local Plan will support the delivery of Oldham's housing requirement, in addition to sites identified within the council's SHLAA and proposals for small-scale development, comprising change of use of less than 10 dwellings. In addition, the identification of allocations could support the delivery of affordable housing through the requirements set out within policy H7 and could provide specialist housing provision such as provision for older people and self/custom build and community led housing.
- 6.323. As the Local Plan review progresses each allocation proposed in the Publication Plan (Regulation 19) will be accompanied by an allocation policy that sets out site-specific requirements. Depending on the nature, scale and location of the proposed allocation such requirements may include:
- The need for a detailed masterplan and infrastructure phasing delivery strategy;
  - Specific housing mix and tenure to address local housing need;
  - Detailed green infrastructure, open space and biodiversity requirements;
  - The need for specific site access arrangements and measures to mitigate the impact of the proposed development on the surrounding highway network;
  - Site-specific design expectations; and

- The need for any supporting infrastructure, including the provision of new and/or extension of existing, education and health facilities, to meet any additional demand resulting from the development proposed.

6.324. Further work will be undertaken to refine the allocations and inform the site-specific requirements for Publication Plan stage.

### Integrated Assessment

6.325. Policy H13 scored mixed in that it scored mostly positive or neutral against the objectives, however some uncertain scores and two negative score was given. The negative scores were given in relation to IA1 (Green Infrastructure) and IA2 (open space) as the policy seeks to allocate sites for housing and / or mixed-use development, some of which may be include elements of green infrastructure/ open space or will result in the need to provide for, or enhance existing, green infrastructure/ open space to meet the additional demand generated.

6.326. An uncertain score was given for IA11 (soil) due to the potential loss of soil as a result of development (as some sites may include green infrastructure/ open space).

6.327. However, no mitigation or enhancement was required to the policy as a result of the IA, as policies N1 to N3 and CO1 mitigates impact on green infrastructure/ open space.

6.328. The policy has been screened in by the HRA as additional houses could result in increases in population, resulting in increased air pollution (from road traffic) and recreational disturbance effects. The HRA identifies mitigation measures to address likely significant effects.

## 7. Further Work and Next Steps

7.1. Between the Draft Plan stage and Publication Plan stage further evidence will be provided which will inform the policies within this topic paper as appropriate, including:

- A partial update of the LHNA which will provide updated evidence on housing mix and local housing needs (including homes for older people, homes for disabled people, affordable housing, HMOs and self and custom build and community-led housing);
- Further work undertaken in regard to site allocations, including refining the allocation details and potentially identifying sites for particular types of housing provision. This will inform any necessary site-specific criteria for the site allocation policies; and
- An update of the GTAA will be carried out to update evidence on the accommodation needs of gypsies, travellers and travelling showpeople.

7.2. In addition to the housing related evidence listed above, a whole plan viability assessment will be carried out which will assess the policy requirements and site allocations within the plan, including those requirements and allocations identified within the housing chapter.