

Oldham

Local Plan

Publication Plan: Housing Topic Paper

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Oldham
Council

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1. Introduction and Purpose

- 1.1. This is the Housing Topic Paper and is one of 13 topic papers produced to inform the consultation on the Oldham Local Plan: Publication Plan.
- 1.2. All Topic Papers can be found online at [Oldham Council's website](#).¹
- 1.3. The main purpose of the Topic Paper is to set out:
 - the current key policies, plans and strategies relating to housing that have informed the Local Plan;
 - the main issues, problems and challenges relating to housing that we face in Oldham, underpinned by proportionate and relevant evidence;
 - how policies within the Oldham Local Plan: Publication Plan have been shaped, having regard to:
 - the key issues, problems and challenges facing the borough in relation to housing;
 - responses received as part of the Oldham Local Plan: Draft Plan consultation and Duty to Co-operate discussions;
 - the outcomes of the Integrated Assessment, including any requirements of the Habitat Regulations Assessment; and
 - how, with these policies, the Plan sets out an appropriate strategy that is based on proportionate evidence.
- 1.4. The Setting the Scene Topic Paper sets out the context for the Oldham Local Plan: Publication Plan, its purpose and how it relates to the Places for Everyone Joint Development Plan Document.
- 1.5. Collectively the Topic Papers support and complement the Oldham Local Plan: Publication Plan, demonstrating how policy choices have been informed, providing transparency around decision-making, and assisting those viewing the Plan and the examining Inspector in understanding the rationale behind the Plan's content.

2. Relevant Policies, Plans and Strategies

- 2.1. This section sets out the main policies, plans and strategies that relate to housing and which have informed the policy approach taken.

National Context

National Planning Policy Framework

- 2.2. National Planning Policy Framework¹ (NPPF) sets out several policies relating to communities as set out below.
- 2.3. 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'.
- 2.4. Paragraph 11 sets out a presumption in favour of sustainable development, which in terms of plan-making means that plans should seek to meet the development needs of their area; 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.
- 2.5. Paragraphs 20 to 23, state 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). Strategic policies should 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.
- 2.6. Chapter 5 (Delivering a sufficient supply of homes) sets out the requirements regarding boosting the supply of homes. The key elements are set out in paragraphs 2.6 to 2.12 below.
- 2.7. Paragraph 62 states that strategic policies should be based upon a local housing need assessment, conducted using the standard method set out in national planning guidance.
- 2.8. Paragraph 63 states that policies should identify the size, type and tenure of homes needed for different groups in the community including those in need of affordable housing (including Social Rent); families with children; looked after 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.
- 2.9. Paragraphs 64 to 66 set out the requirements in relation to affordable housing as follows:
- Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (including the minimum proportion of Social Rent homes) 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;

¹ National Planning Policy Framework (December 2024, as amended February 2025) available at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

- Affordable housing should not be sought for developments that are not for major developments, other than in designated rural areas;
 - 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 that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures
- 2.10. Paragraphs 67 to 68 set out the requirements relating to Green Belt development and affordable housing requirements.
- 2.11. Paragraphs 69 and 70 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.
- 2.12. Paragraphs 72 to 73 set out the requirements for identifying land for homes including through the preparation of a Strategic Housing Land Availability Assessment (SHLAA). From this planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability – this should include sites deliverable for five years from adoption and sites considered to be developable for subsequent years of the remaining plan period.
- 2.13. Paragraphs 78 to 79 set out the requirements in relation to maintaining supply and delivery:
- Local planning authorities should identify and update annually a supply of deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. This should include an appropriate buffer.
 - Where there has been significant under delivery of housing (measured by the Housing Delivery Test (HDT)) over the previous three years, the supply of specific deliverable sites should in addition include a buffer of 20% to their identified supply of specific deliverable sites.
- 2.14. Chapter 11 sets out the requirements relating to 'making effective use of land'. It states that planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 2.15. It sets out that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land, 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. Local planning authorities should support opportunities to use the airspace above existing residential and commercial premises for new homes and take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs.
- 2.16. Paragraph 129 sets out the approach to achieving appropriate densities, stating that planning policies should support development that makes efficient use of land.
- 2.17. 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.

2.18. 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 51 of the NPPF clarifies that planning policies may make use of the nationally described space standard.

National Planning Policy Guidance (PPG)

Housing and economic needs assessment (2015, updated 2025)

2.19. This guidance² relates specifically to the standard methodology for assessing housing need, to ensure consistency in meeting the government's aim of boosting the housing supply. The PPG defines housing need as an unconstrained assessment of the number of homes needed in an area and is the first step in 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.

2.20. PPG also sets out the standard methodology for assessing local housing need. The standard methodology uses a formula that incorporates a baseline of local housing stock which is then adjusted upwards to reflect local affordability pressures to identify the minimum number of homes expected to be planned for.

2.21. The guidance also discusses how to consider affordable housing need as part of the overall housing need.

Housing and economic land availability assessment (2014, updated 2019)

2.22. This guidance³ sets out the steps that should be undertaken when carrying out a housing and economic land availability assessment (including a SHLAA). It states that the assessment should identify land suitable, available, and achievable for housing and economic development over the plan period. This should inform local plans, decision-making, and the identification of a 5-year housing land supply. The assessment does not allocate sites for development - this is done through the development plan.

² Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

³ Available at: <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

Housing needs of different groups (2019, updated 2021)

- 2.23. The guidance⁴ supports plan-making authorities in identifying and addressing the housing needs of specific groups within the population.
- 2.24. It sets out that authorities should assess and reflect the needs of the private-rented sector, self-build and custom housebuilding, students, affordable housing and rural housing.

Housing for older and disabled people (2019)

- 2.25. This guidance⁵ sets out the importance of planning for older and disabled people. It states that plans should set clear policies and indicative figures for specialist housing needs and that authorities may allocate sites to provide certainty and encourage development.
- 2.26. It sets out the types of housing that may be suitable for this need group and identifies design principles, including inclusive design and dementia-friendly design, that should be considered by policies and decisions.

Housing supply and delivery (2019, updated 2024)

- 2.27. The guidance⁶ sets out how local planning authorities can ensure sufficient land is available to meet housing needs. It covers the housing land supply (including five-year supply) and the Housing Delivery Test (HDT), both key tools for monitoring and promoting housing delivery.
- 2.28. In terms of housing land supply, it sets out that local planning authorities are required to demonstrate a supply of specific, deliverable housing sites sufficient to meet housing requirements over a five-year period. This requirement is derived either from adopted strategic policies or, where such policies are outdated, from local housing need calculated using the standard method. Authorities must apply a buffer—typically 5% or 20% depending on past delivery performance—to ensure market flexibility and resilience.
- 2.29. Deliverability of sites is assessed based on planning status, developer commitments, site viability, and infrastructure readiness. Authorities must also identify developable sites or broad locations for years 6–10 and, where possible, years 11–15. Stepped housing requirements may be used to reflect phased delivery of strategic sites, provided they do not delay meeting overall housing needs. Also, over-supply of housing completions can be used to offset any shortfalls against requirements from previous years.
- 2.30. The guidance provides details of the HDT, including how it is applied and the consequences for under delivery of housing.

Housing: optional technical standards (2015)

- 2.31. This provides guidance⁷ on how planning authorities can gather evidence to set optional requirements and the nationally described space standard. Issues

⁴ Available at: <https://www.gov.uk/guidance/housing-needs-of-different-groups>

⁵ Available at: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

⁶ Available at: <https://www.gov.uk/guidance/housing-supply-and-delivery>

⁷ Available at: <https://www.gov.uk/guidance/housing-optional-technical-standards>

discussed include standards such as accessibility, adaptability and wheelchair standards, water efficiency and internal space standards in new homes.

Effective use of land (2019, updated 2025)

- 2.32. This provides guidance⁸ on the effective use of land to optimise land use in the context of housing and urban development. It emphasises the importance of encouraging temporary uses and promoting higher-density development where appropriate.
- 2.33. Related to housing, PPG is also provided on Brownfield Land Registers, Build to Rent, Self and Custom Housebuilding, First Homes and Rural Housing.

Greater Manchester Context

Greater Manchester Strategy (2025-2035)

- 2.34. The vision for the Greater Manchester Strategy⁹ is to create a thriving city region where everyone can live a good life, with a focus on: healthy homes for all; safe and strong communities; a transport system for a global city region; a clear line of sight to high quality jobs; everyday support in every neighbourhood; a great place to do business and digitally connected places and people.
- 2.35. Specifically, in terms of housing, the Strategy sets out that there will be an increase in housing supply, improved housing standards, reduced numbers of people living in temporary accommodation and support for residents to access a decent affordable home.

Greater Manchester Housing Strategy (2019-2024)

- 2.36. The Strategy¹⁰ is based on and builds upon the previous Greater Manchester Strategy (2018). Whilst there has been an updated Greater Manchester Strategy published in 2025 as set out above, the housing strategy still provides useful context in relation to regional housing growth strategy.
- 2.37. 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.
- 2.38. The vision for the existing homes within Greater Manchester's stock is:
- for them to receive the investment they need to exceed modern requirements for their safety, warmth and physical accessibility. This includes retrofitting existing homes to meet Greater Manchester's carbon neutral ambitions;

⁸ Available at: <https://www.gov.uk/guidance/effective-use-of-land>

⁹ Greater Manchester Strategy 2025-2035 (published July 2025), available at:

<https://www.greatermanchester-ca.gov.uk/what-we-do/greater-manchester-strategy/>

¹⁰ Greater Manchester Housing Strategy 2019-2024 (published June 2019), available at:

<https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/housing/housing-strategy/>

- that the 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
- that when we rent in either the social or private sector, we can be confident that the homes will be well managed and safe, decent and affordable.

2.39. 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 Greater Manchester;
- that the new homes enhance the choice, affordability, quality and variety of housing available, and are accompanied by transport, social and other infrastructure needed 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 Greater Manchester's residents; and
- that the construction industry in Greater Manchester is a centre of excellence and innovation, and an attractive employer for a new generation of skilled workers.

2.40. 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)

2.41. The Places for Everyone (PfE) Joint Development Plan Document (DPD)¹¹, is a strategic plan that covers nine of the ten Greater Manchester districts - Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. The Plan took effect and became part of the statutory development plan for each of the nine PfE authorities on 21 March 2024. The relationship between PfE and the Oldham Local Plan: Publication Plan is explained in the 'Setting the Scene' Topic Paper.

2.42. 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 (that is 2022-2039). 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;
- JP-H2 Affordability of New Housing – sets out the need to increase affordable housing, including that Local Plans should identify targets for the

¹¹ Places for Everyone (PfE), available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/>

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. It also sets out minimum densities in this regard dependent on site location and accessibility and specifies an appropriate housing mix related to these densities.

2.43. Chapter 11 of PfE also allocates sites for employment and housing development outside of the urban area – in Oldham the housing allocations are JPA10 Beal Valley, JPA11 Bottom Field Farm, JPA12 Broadbent Moss, JPA13 Chew Brook Vale, JPA14 Cowlshaw, JPA15 Land south of Coal Pit Lane’ and JPA16 South of Rosary Road.

Greater Manchester Gypsy and Traveller Accommodation Assessment (2024)

- 2.44. The Greater Manchester 2024 Gypsy and Traveller Accommodation Assessment (GTAA)¹² provides the latest available evidence to identify the accommodation needs of Gypsies and Travellers across the local authority areas of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan.
- 2.45. The 2021 Census identified a population of 2,170 people who identified as ‘White: Gypsy or Irish Traveller’ or ‘Gypsy/Romany’ living in Greater Manchester. There are an estimated 995 households in Greater Manchester where the Household Reference Person identifies as Gypsy/Traveller. In addition, there were 83 people who identified as ‘Roma’.
- 2.46. There are a total of 23 sites across Greater Manchester with a total of 168 pitches. Of these pitches, 137 are occupied by 135 households and 31 are vacant. There are some pitches with more than one household and some where one household lives across several pitches and this accounts for the slight difference between pitches and households.
- 2.47. The 23 sites across Greater Manchester are broken down further as:
- 5 council sites, 102 pitches (74 occupied by 78 households, 28 vacant).
 - 16 private authorised sites, 64 pitches (61 occupied by 55 Gypsy and Traveller households (with 4 households occupying 2 pitches), 3 vacant pitches).
 - 1 site with temporary planning permission, 1 pitch (1 occupied by 1 Gypsy and Traveller household, 0 vacant pitches).

¹² GTAA (2024), available at: <https://www.greatermanchester-ca.gov.uk/media/jotblsr1/gmca-gtaa-final-report-08-11-24-accessible-for-publishing.pdf>

- 1 site with a planning permission being considered, 1 pitch (1 occupied by 1 household).
- 2.48. Need has been assessed over a short-term period: 2023/24 to 2027/28 and longer-term period: 2028/29 to 2040/41. There is a minimum need for 109 additional Gypsy and Traveller pitches across Greater Manchester over the period 2023/24 to 2040/41. Of this need, 21 are needed in the first five years and 88 over the period to 2040/41. There is no specific need identified for gypsy and traveller pitches in Oldham.
- 2.49. In terms of meeting the need, the GTAA recommends that councils should consider regularising sites which are not permanently authorised and identifying additional pitch provision using existing sites. This potential supply could provide at least 13 additional pitches to help meet identified needs. In addition, 9 pitches are likely to come available over the plan period through household dissolution.
- 2.50. The GTAA also recommends further work to review the potential for additional pitch development on existing sites and the occupancy of permanent pitches. It goes on to say that the 10 councils should consider the issue of meeting the overall identified need for Greater Manchester collectively, with the potential redistribution of need being an option to meet need.
- 2.51. Additional need may arise over the plan period, for instance households moving into Greater Manchester. The GTAA therefore recommends that councils have criteria-based policies to inform future planning applications for private sites should they arise.

Greater Manchester Gypsy and Traveller Accommodation Assessment (2018)

- 2.52. Whilst the 2024 GTAA provides the latest available evidence in relation to Gypsies and Travellers, the 2018 GTAA¹³ sets out the most recent evidence in relation to Travelling Showpeople for the Local Authorities of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan.
- 2.53. For Travelling Showpeople the assessment found a shortfall of 204 plots across Greater Manchester up to 2035/36, driven by household formation and overcrowding on existing yards. In addition, the need to provide for 59 transit pitches across the study area was also identified.
- 2.54. Further work may be undertaken to understand and identify the spatial distribution of plots for Travelling Showpeople and transient pitches. This may also include the identification of specific sites in Oldham in the future.

Local Context

- 2.55. A summary of the Oldham Partnership's Oldham Plan and the Council's Corporate Plan and how the Local Plan will help to deliver their missions and priorities is

¹³ GTAA (2018), available at: <https://www.greatermanchester-ca.gov.uk/media/1678/greater-manchester-gypsy-and-traveller-and-travelling-showperson-accommodation-assessment-update-2018.pdf>

provided in the Setting the Scene Topic Paper. The sections below mainly focus on those parts of the plans relevant to the housing theme.

The Oldham Plan

- 2.56. The Oldham Plan 2024-2030 Pride, Progress and Partnership¹⁴ sets out three clear missions to achieve by 2030 to deliver real improvements to the lives of Oldham people, this includes 'Great Places to Live'. This includes providing more affordable, quality homes, improving public spaces, and creating a strong local economy with vibrant communities that get on well.

Oldham Council Corporate Plan

- 2.57. Oldham Council's Corporate Plan (2024-2027)¹⁵ builds on the Oldham Plan and is focused on the same three goals – Healthier, Happier Lives, Great Place to Live and Green and Growing. The aim is that by fostering innovation, investing in people, and supporting our communities, we'll ensure Oldham remains a place where everyone can thrive. With strong leadership, commitment to our values, and ongoing improvement, we're ready to adapt to the changes in local government.
- 2.58. There are four main focus areas that guide this plan and will help to achieve the goals:
- Efficiency and value for money - making the best use of our resources throughout the organisation.
 - Capacity building - building strong infrastructure to meet our needs now and in the future.
 - Digital - using digital tools to improve services and make our organisation more efficient.
 - Prevention and early help - actively working to reduce the need for our services by focusing on prevention and early support.
- 2.59. Specifically, the Plan sets out that in terms of capacity building, the borough's housing developments will promote sustainability, foster growth and ensure long term stability. It is also important to develop a range of residential accommodation solutions.
- 2.60. Relevant to housing, by 2027 the Plan sets out that:
- we will be progressing with delivering a new neighbourhood of 2,000 homes at the heart of Oldham town centre;
 - there will be better housing across Oldham, with increased social and private rented sector housing standards for all residents;
 - our neighbourhoods will be places where residents are proud to live; and
 - there will be more homes of a great standard that are affordable for all local people.

¹⁴ The Oldham Plan is available at https://www.oldham.gov.uk/info/201261/oldham_plan/3207/oldham_plan

¹⁵ The Corporate Plan is available at https://www.oldham.gov.uk/downloads/file/8094/oldham_corporate_plan_ready_for_the_future

Building a Better Oldham

- 2.61. Building a Better Oldham¹⁶ is the Council's ambitious transformation programme for the borough. As with the Partnership's missions, the Local Plan supports delivery of this ambitious programme.
- 2.62. In terms of housing in particular, the programme aims to build quality homes, including 2,000 new homes within Oldham Town Centre delivered by the Council's partner Muse. As part of this, planning applications have recently been approved (in July 2025) for several sites within Oldham Town Centre as follows:
- Land between Prince Street, Oldham Way and Mumps Metrolink stop (former Mumps site) – approved for 331 homes (FUL/354326/25). SHLAA site reference SHA0021.
 - Former Leisure Centre Site, Lord Street – an outline planning application approved for 231 homes (OUT/354324/25). SHLAA site reference SHA1759.
 - Civic Centre, West Street – an outline planning application approved for 838 homes (OUT/354338/25). SHLAA site reference SHA2000.
 - Former Magistrates Court and Manchester Chambers – an outline planning application approved for 219 homes (OUT/354323/25). SHLAA site reference SHA2001.

Oldham's Housing Strategy (2019)

- 2.63. The aim of the Housing Strategy¹⁷ is to provide a diverse housing offer in Oldham, that is attractive and meets the needs of different sections of the population at different stages of their lives. The proposals go beyond the projected numbers of new homes and focus on the dynamics between people, homes and the wider economy.
- 2.64. In addition to the ambitions of the Strategy to build a broader range of housing in the borough, it considers how best the Council can support people in a range of housing situations.
- 2.65. Oldham's 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 house.

¹⁶ Building a Better Oldham is available at https://www.oldham.gov.uk/info/201248/building_a_better_oldham#:~:text=Building%20a%20Better%20Oldham%20is,jobs%20and%20100%20apprenticeship%20opportunities.

¹⁷ Oldham's Housing Strategy available at: https://www.oldham.gov.uk/info/200584/housing_strategies_and_research

- Greater choice for existing tenants.
- Bringing empty homes back into use.
- Improved quality and condition of homes and tenancies for private tenants.

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

- Housing delivery to meet housing need.
- Lack of available funding.
- 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.
- Lower than average levels of home ownership, compared to Greater Manchester and England.
- Outward migration of younger people from the borough to live elsewhere.
- High levels of overcrowding, particularly in the terraced housing stock, and limited supply of larger family housing.
- Limited supply of viable sites to support the intended scale of housing development.
- The need to increase development on brownfield sites and make such 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.
- Increasing homelessness and people at risk of homelessness.

2.67. 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.

- 2.68. 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.
- 2.69. 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.
- 2.70. The Housing Strategy is supported by a [Local Housing Needs Assessment \(LHNA\)](#)¹⁸ – the 2019 LHNA was published alongside the Strategy, however this has now been updated in 2024.
- 2.71. The LHNA (2024) provides evidence on housing needs and supply and has informed the policy development of policies within the Local Plan.
- 2.72. Further evidence from the LHNA is provided throughout this topic paper, as appropriate.

¹⁸ Oldham's LHNA (2024), available at:
https://www.oldham.gov.uk/downloads/download/1542/housing_strategy

3. Issues, challenges and opportunities relating to Housing

- 3.1. This section summarises the main issues, challenges and opportunities relating to housing faced in Oldham, underpinned by proportionate and relevant evidence.

Demographics

- 3.2. Some of Oldham's housing challenges are linked to Oldham's demographic make-up.
- 3.3. Oldham's population is around 251,560 and is expected to increase to around 260,000 by 2039¹⁹. 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 over²⁰. However, reflecting national trends, generally Oldham has an ageing population. There are approximately 39,000 people aged 65 and over living in Oldham currently, which is expected to increase by 26.62% to over 49,500 people by 2040. Also, the number of people in Oldham over the age of 85 is projected to increase by 43% by 2040. Between 2023 and 2040 there is an expected increase of 38.4% in people over 65 with dementia. This will bring major challenges for adult social care and specialist housing providers.
- 3.4. In some areas of the borough levels of deprivation are generally ranked amongst the highest in the country. Oldham currently has seven areas within the borough which are among the top 1% of the nation's most deprived areas. These areas are mainly within inner Oldham, including within the wards of St Mary's, Coldhurst, Alexandra and Medlock Vale. Oldham's overall ranking has declined from 19th to 11th most deprived, between the 2019 IMD and the 2025 IMD²¹. Figure 1 shows the levels of deprivation across Oldham.

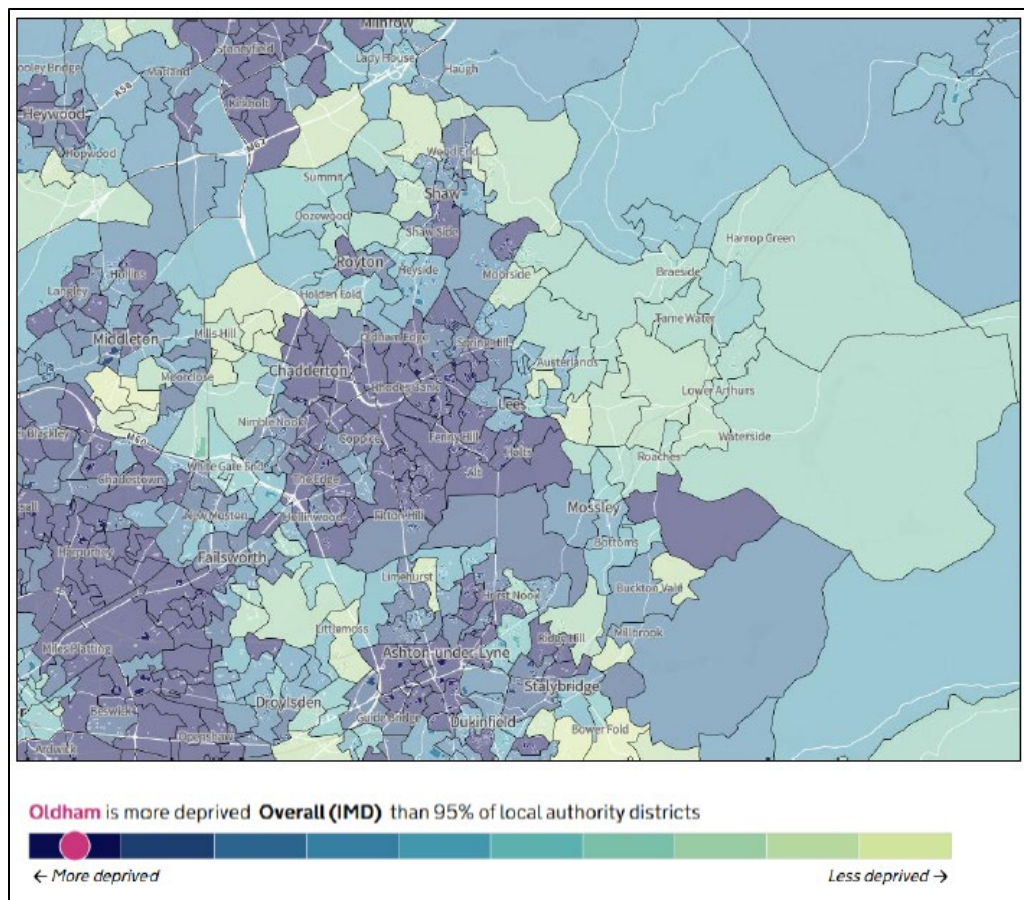
¹⁹ ONS, Population estimates for England and Wales: mid-2024. Information on the mid-year estimates can be found here:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationestimatesforenglandandwales/mid2024#local-authorities>

²⁰ Oldham's Joint Strategic Needs Assessment: <https://www.jsnaoldham.co.uk/profile/>

²¹ Indices of Multiple Deprivation (IMD) (2025).

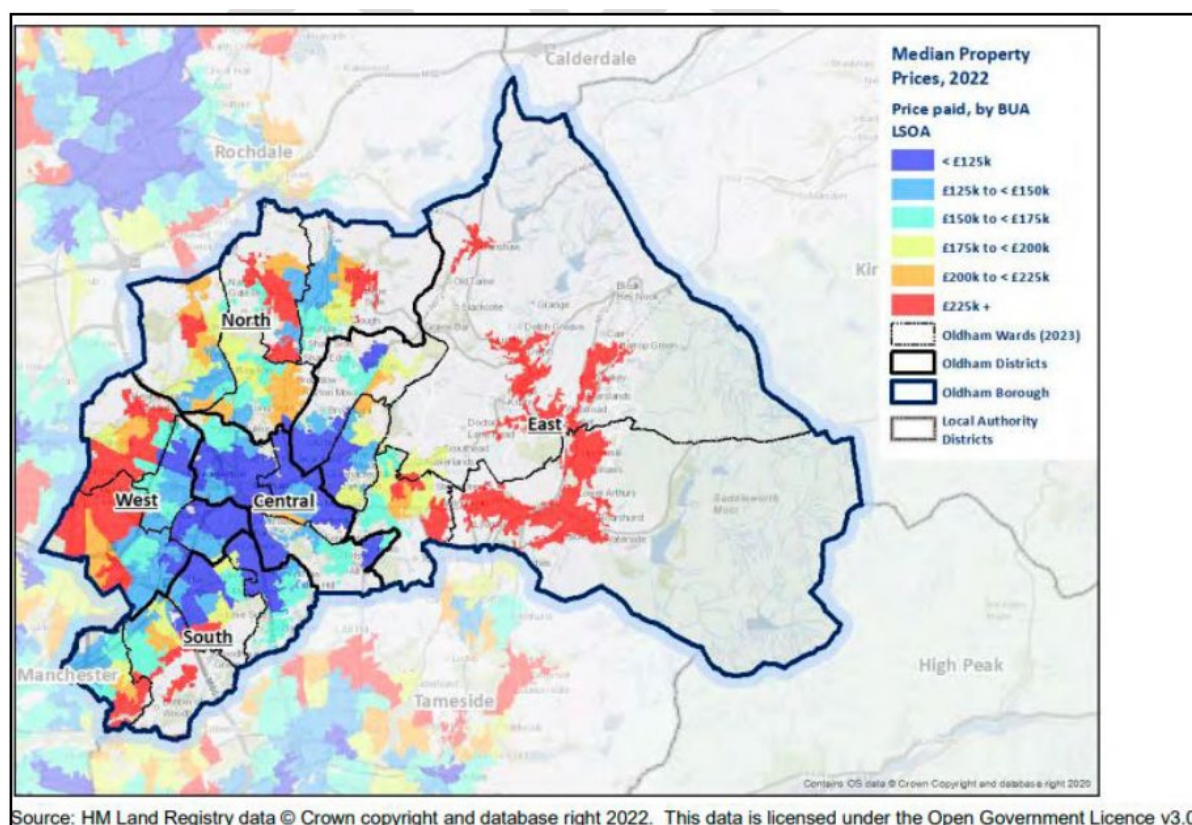
Figure 1: Index of Multiple Deprivation Map for Oldham²²



3.5. In terms of house prices and affordability, in Oldham median prices have increased by 318.6% from £43,000 in 2000 to £180,000 in 2022. This rate of growth is higher than that experienced across the Greater Manchester region (298.1%), the North-West (+248.7%) and England as a whole (+217.1%). As shown in Figure 2 below, the distribution of median house prices across the borough also follows a distinct pattern of relatively higher prices in the East and West districts and relatively lower prices in the Central and South districts.

²² Source: Index of Multiple Deprivation (2025) - adapted from Oldham's Local Plan Viability Assessment (2025) 'figure 6.7'.

Figure 2: Median house prices in Oldham²³



- 3.6. Private rents are also increasing in Oldham at a rate faster than the North-West and England averages. Between 2010 and 2022 lower quartile private rents increased by 39.8% and median private rents increased by 53.4% in Oldham, compared to 32.2% / 34.1% for lower quartile private rents and 46.9% / 39.8% for median private rents in the North-West and England respectively. There is a high proportion of privately rented properties within inner Oldham.
- 3.7. In terms of relative affordability (ranked based on 2022 least-to-most affordable), Oldham borough is the third most affordable local authority area compared with other areas of Greater Manchester and neighbouring districts to Oldham. At a ratio of 5.93, Oldham is less affordable than the North-West, however.
- 3.8. Related to affordability, income is also an issue in areas of Oldham. Oldham has traditionally had low wage levels in terms of both residents and workplace earning potential (as measured by median weekly wage levels). This is likely due to the industry mix within Oldham, and the relative skill levels of the local workforce.
- 3.9. There are higher proportions of lower income households within inner Oldham – particularly within Central, West, and South districts. Higher income households are predominantly located within the fringes of the borough and within Saddleworth districts²⁴.

²³ Median house prices by built up areas (BUA) within the LSOAs of Oldham Borough. Extracted from Map 3.2 Oldham LHNA (2024).

²⁴ See Map 2.4 of the LHNA (2024) for further information.

Housing Requirement and Delivery

- 3.10. There is a need to deliver suitable high-quality housing for all residents of Oldham and at a scale that meets our housing requirement.
- 3.11. 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 at least 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. The housing requirement should be considered a minimum figure.

Table 1: Phasing of Housing Requirement²⁵

	Annual Average	2022-2025	2025-2030	2030-2039	Total
Number of Homes Required	680	404	680	772	11,560

- 3.12. The PfE Housing Topic Paper²⁶ sets out the methodology for the calculation of the stepped housing requirement. The housing requirement is calculated using the government's standard methodology for calculating local housing need, as set out in NPPF (December 2020) – the version of the NPPF which applies to PfE.
- 3.13. The government's standard methodology for calculating local housing need has been revised in the latest version of NPPF (December 2024). However, it is relevant to use the PfE housing requirement for this Local Plan, as the Joint Plan provides the strategic planning framework under which the Local Plan will sit. Further detail on the Local Plan's relationship with PfE is set out in the Setting the Scene Topic Paper.
- 3.14. PfE Policy JP-H1 sets out that *'where national policy requires a local planning authority to identify and update annually a supply of specific the deliverable sites in their district, this will be assessed against the minimum delivery rates for the district set out in Table 7.2, irrespective of any shortfalls or surpluses in other districts and in the Plan area overall (unless national policy requires a different figure to be used²⁷). Each local authority will monitor delivery rates within their area and will take action as necessary to ensure that delivery rates are maintained as anticipated in this plan. If this regular monitoring reveals significant deviation from the phasing in this plan, the factors resulting in these changes will be determined and consideration will be given to what action would be appropriate, including development management action and review of the policies in this plan. This work would feed into the regular reviews of this plan, although individual authorities may wish to take specific local action outside the formal review process to ensure that they can maintain delivery rates.'*
- 3.15. Oldham's housing requirement set out in PfE is significantly higher than the previously adopted Local Plan (the Core Strategy, 2011) housing requirement of

²⁵ Adapted from PfE Policy JP-H1 Table 7.2.

²⁶ Places for Everyone 'Housing Topic Paper' 2021, available at: <https://www.greatermanchester-ca.gov.uk/media/gfxalewm/06-01-03-housing-topic-paper.pdf>

²⁷ I.e. in line with the consequences of under-delivery set out in the [Housing Delivery Test](#).

289 new homes per year, and higher than that of recent average annual completions, which in the past ten years (2015/16 to 2024/25) have averaged 443 homes a year (net). Table 2 sets out Oldham's past housing completions.

Table 2: Oldham's Housing Completions

Year	Houses Completed (net)
2015/16	296
2016/17	374
2017/18	345
2018/19	410
2019/20	728
2020/21	373
2021/22	506
2022/23	403
2023/24	420
2024/25	578

- 3.16. As set out in Table 2 above, Oldham's housing completions have been variable in the past. In general, completions began to increase from 2016/17, with exceptionally high numbers of homes completed in 2019/20 with several large sites completing during this year. Completions were lower than average in 2020/21, however it is likely that the impact of Covid-19 and wider socio-economic issues affecting the construction and housing industries was the cause.
- 3.17. In addition to the completions evidence set out above, as Oldham's Local Plan period and housing requirement is based on the PfE plan period of 2022-2039, it is necessary to consider housing delivery against the housing requirement since the start of the plan period (2022/23). Table 3 below demonstrates this.

Table 3 Housing completions compared to requirement (2022-2025)

Year	Housing Requirement (as per PfE Policy JP-H1 and Local Plan Policy H1)	Number of Houses Delivered/ Completed (net)
2022/23	404	403
2023/24	404	420
2024/25	404	578
Total	1,212	1,401

- 3.18. As shown in Table 3, since the start of the plan period Oldham has delivered 1,401 homes which is 115% of our requirement for this period. This demonstrates that we have been able to meet our minimum housing requirement for the early years of the plan period.
- 3.19. Whilst the annual completions to date are positive, it is important to note that the housing requirement is stepped, so the number of homes to be delivered increases in increments over the plan period, as set out in Table 1. As such, the delivery of housing to meet our requirement remains important, and the Local Plan will need to support this.
- 3.20. Based on the evidence set out above and the housing requirement for the remaining years of the plan (2025/26 to 2038/39), Oldham needs to deliver at least 10,159 homes over the period to meet our housing requirement.

Housing Supply

- 3.21. PfE Policy JP-H1²⁸ sets out that Oldham's total (minimum) housing requirement for the plan period is 11,560 homes. Policy JP-H1 identifies that Oldham's housing land supply for the plan period (2022-2039) is approximately 13,331 homes²⁹.
- 3.22. Oldham's housing land supply includes a 15% buffer (of dwellings) for flexibility and market choice (accounting for sites within the housing land supply not coming forward as anticipated), which is recommended in NPPF and especially important when identifying land over a long period.
- 3.23. The overall PfE housing supply (2022-2039) includes a 13.5% buffer on top of the housing requirement (the minimum number of homes required over the plan area) for flexibility and market choice.
- 3.24. As such, Oldham's identified housing land supply (and the flexibility buffer) is sufficient to ensure that Oldham's housing requirement (as set out in PfE) can be met.
- 3.25. That said, NPPF (and PfE Policy JP-H1) requires that Local Authorities update annually a supply of specific deliverable sites. This should be done through the preparation of a Strategic Housing Land Availability Assessment (SHLAA) which

²⁸ See PfE Policy JP-H1 Table 7.1 and Table 7.2.

²⁹ Note, this was based on the Housing Land Supply update for 2022/23.

should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

Oldham's SHLAA

- 3.26. Since 2017, Oldham has prepared a SHLAA annually. The SHLAA forms a key component of the Local Plan evidence base to support the delivery of sufficient land for housing to meet housing targets.
- 3.27. The base date for the SHLAA that relates to the Publication Plan is 1 April 2025. It was published in January 2026³⁰.
- 3.28. The SHLAA looks forward over the remainder of the Local Plan period (2025/26 to 2038/39), and beyond.
- 3.29. It 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 housing land supply.
- 3.30. 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.
- 3.31. The sites within the SHLAA are split into different categories depending on their planning status (at the end of the current monitoring period i.e. 31 March 2025) 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 (including prior approvals);
 - Saved housing allocations (UDP Phase 1 and 2)³¹;
 - Places for Everyone Strategic Allocations (housing);
 - 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 and pending sites (sites that have been identified as being suitable for housing in the future but have not as yet received permission for housing or are not allocated for residential use. Or sites which are the subject of a

³⁰ Oldham's SHLAA (2025), available online at:

https://www.oldham.gov.uk/info/201230/monitoring/2134/strategic_housing_land_availability_assessment_shlaa

³¹ The remaining Saved UDP Housing Allocations will be de-designated as part of the new Local Plan. However, at 1 April 2025, they were still ‘saved’ and therefore presented in their own category in the housing land supply. Once they are de-designated these sites will, where appropriate, be presented in other relevant categories i.e. ‘Potential and Pending Sites/ Lapsed and Stalled Sites’, in future SHLAA updates.

pending planning application, which are considered to be suitable in principle. On the whole, these sites are considered unconstrained in relation to significant policy or physical limitations).

- 3.32. Oldham's housing land supply (2025), as set out within the SHLAA, identifies land to accommodate 12,364 homes 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.
- 3.33. For reporting purposes, the housing land supply is identified in time periods of short (2025-2030), medium (2030-2035) and long (2035-2039) term and beyond the plan period – post 2039, as set out in Table 3 below.

Table 3: Oldham's Housing Land Supply (at 1 April 2025)

Site Category/ Status	Total Dwellings Years 2025-2030	Total Dwellings Years 2030-2035	Total Dwellings Years 2035-2039	Total Dwellings Years 2039+ (post plan)	Total Dwellings All Periods
Sites under construction	1,800	65	0	0	1,865
Sites with extant planning permission	765	427	0	0	1,192
Saved UDP Phase 1 and 2 housing allocations	4	171	78	0	253
Lapsed and stalled sites	10	297	205	0	512
Potential & pending sites	1,439	1,812	2,486	354	6,091
PfE Strategic Allocations	546	1,414	339	152	2,451
<i>Subtotal</i>	<i>4,564</i>	<i>4,186</i>	<i>3,108</i>	<i>506</i>	<i>12,364</i>
Small sites allowance minus any small sites already identified in supply	0	300	240	0	540

Site Category/ Status	Total Dwellings Years 2025-2030	Total Dwellings Years 2030-2035	Total Dwellings Years 2035-2039	Total Dwellings Years 2039+ (post plan)	Total Dwellings All Periods
Clearance allowance	20	20	16	0	56
Total	4,544	4,466	3,332	506	12,848

- 3.34. As shown in Table 3, a small sites allowance of 60 homes per year is applied for years 2030 to 2039. The approach to small sites is set out in the SHLAA³². The allowance rate is based on an analysis of housing completions on small sites over a five-year period 1 April 2020 to 31 March 2025. This shows that 297 homes have been completed on small sites in this period (around 13% of all completions over this time – 2,280 homes), equating to an average of an additional 60 homes per year.
- 3.35. The Council considers 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 all small sites that have potential for residential development for inclusion in the SHLAA, beyond the five-year supply. The small sites allowance is only applied from year 6 as small sites are already included in years 0-5 (where it is known they have planning permission or are under construction).
- 3.36. A small number of sites capable of delivering under 5 dwellings (11 sites) have been assessed as being suitable, available and achievable, and have therefore been included within the lapsed and stalled category, in the post five-year supply. Most of these sites have a recently lapsed planning permission, indicating there may be some viability issues affecting the delivery of the site at the present time, however this does not mean they will not come forward in the future with a new planning permission. It is considered that the small sites allowance is still relevant to apply in addition to the inclusion of these sites given the limited number included and considering that small site delivery is highly variable and subject to change. Further detail is set out in the SHLAA.
- 3.37. In addition, an allowance for clearance is also applied to account for dwellings cleared or lost from the housing land supply.
- 3.38. In previous years, large scale renewal schemes have led to relatively high clearance rates but, more recently, most clearance/loss is on a very small scale, with 29 dwellings being granted planning permission for change of use or demolition and only 12 actual losses have occurred over the past five years.
- 3.39. As such, a small clearance allowance of minus 4 dwellings a year has been applied to the housing land supply for 2025 (an average of both permissions granted for demolition/ change of use and the actual losses occurred).

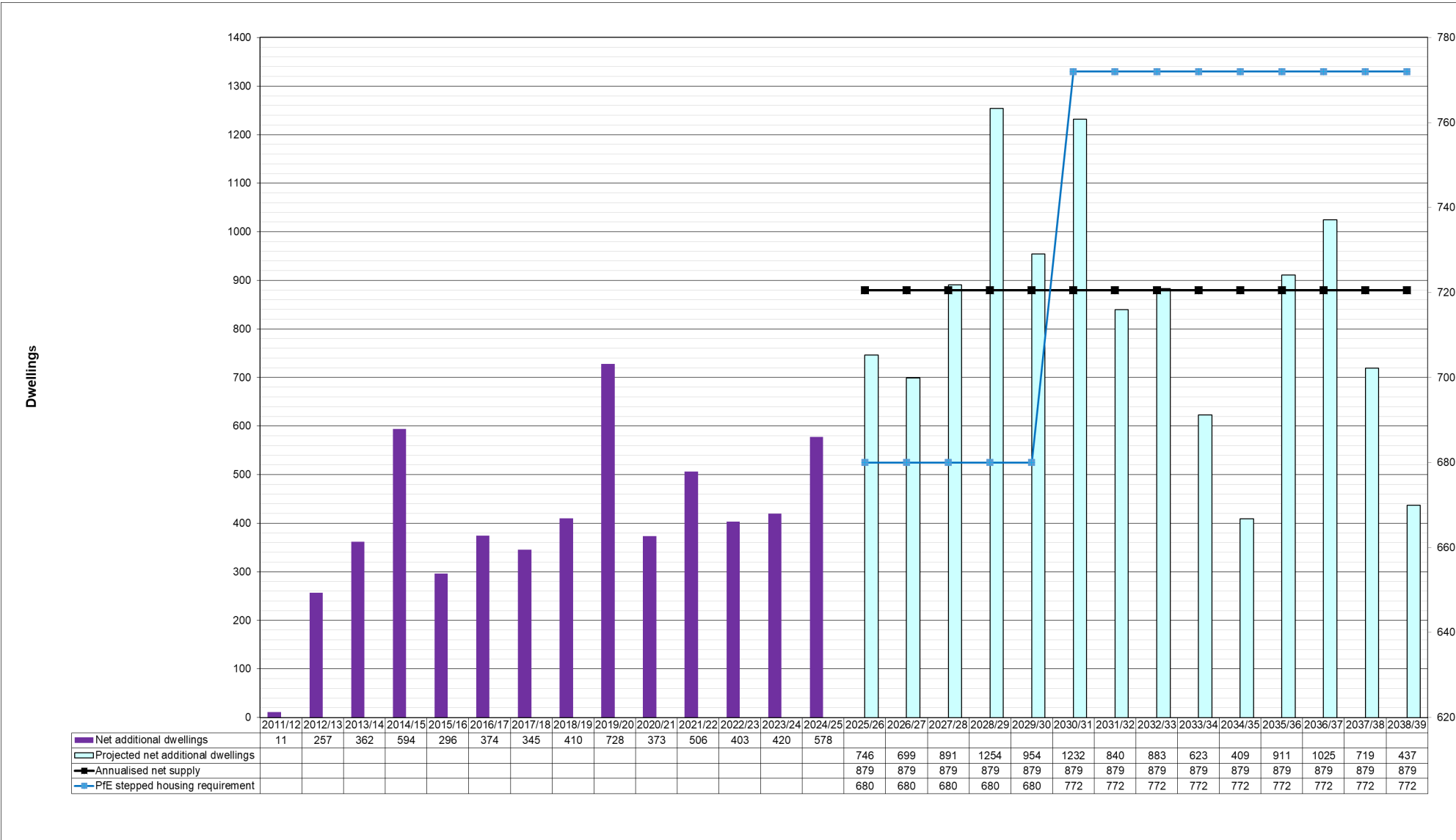
³² SHLAA, section 4 'Methodology', pages 28-29.

- 3.40. No allowances are applied beyond 2039 – i.e. beyond the PfE plan period. The small site and clearance allowances will be reviewed at future SHLAA updates, as appropriate.

Housing Land Supply Trajectory

- 3.41. The anticipated delivery of Oldham's housing supply is set out annually in the SHLAA (see Appendix 1a of the SHLAA) and is shown in Figure 3 below.
- 3.42. Whilst it is indicative, Figure 3 shows that compared to past completions there is expected to be an increase in the annual average completion rate over the next five years (2025/26 to 2029/30) with 4,544 net completions over this period (taking account of projected clearance). This equates to an annual average of 909 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. This equates to a five-year supply of 6.7 years or 133% of our housing requirement for this period (a total of 3,400 homes for 2025-2030). As such, the five-year supply is sufficient to meet our housing requirement for this period, as required by NPPF.
- 3.43. Overall, the housing land supply equates to an annual average projected supply of 879 dwellings per year for the period of 2025/26 to 2038/39.

Figure 3: Housing Land Supply Trajectory (at 1 April 2025)



- 3.44. The trajectory indicates that a further 7,079 dwellings are expected to be delivered beyond five years, taking into account projected clearance (including 506 dwellings expected to be delivered beyond 2039 (post-PfE)).
- 3.45. As set out above, Oldham needs to deliver at least 10,159 homes over the remaining plan period (20025/26 to 2038/39) to meet our overall housing requirement (11,560 homes, as applies to 2022-2039). The trajectory above indicates that Oldham's identified housing land supply (at 1 April 2025) – a total of 11,858 homes within the remaining plan period (before allowances) - is capable of exceeding the minimum housing requirement, providing an additional 1,699 homes.

Breakdown of the Housing Land Supply

- 3.46. In terms of the types of sites which make up Oldham's housing land supply, the majority of the supply is made up of brownfield sites (60% of the total housing land supply), or mixed sites which include both brownfield and greenfield land (14% of the total housing land supply). Just over a quarter of the housing land supply is made up of greenfield sites (26%). This shows that the focus of the future housing supply in Oldham is on brownfield or mixed sites, which is important in making the most effective use of available land and for sustainability.
- 3.47. In terms of the size of sites which make up Oldham's housing land supply, there are:
- 2,212 homes identified on 2 large-scale strategic sites (sites of over 500 dwellings/ supported by significant infrastructure)
 - 3,961 homes identified on 15 large major sites (sites of 200-500 dwellings)
 - 3,731 homes identified on 39 medium-large major sites (sites of 50-199 dwellings)
 - 1,724 homes identified on 87 small-medium major sites (sites of 10-49 dwellings)
 - 736 homes identified on 273 minor sites (sites of less than 10 dwellings)
- 3.48. Therefore, approximately half of the housing land supply is made up of strategic and large-scale sites (50%). Large sites tend to be more attractive to volume housebuilders, are usually built out faster and are generally less susceptible to market changes, making them less likely to lapse and stall. Conversely, approximately half of the housing land supply is made up of smaller sites. Smaller sites tend to be built out slower and by individual builders or smaller developers and can be more susceptible to market changes and less financially stable if problems occur. It is important that the housing land supply provides opportunities for a variety of developers, including small housebuilders, however the delivery of smaller sites will need to be carefully monitored.
- 3.49. Table 4 sets out the composition of the housing land supply in terms of their planning status. As shown, over half of the housing land supply is made up of sites without an extant planning permission or which are not under construction. A further 15% of the housing land supply was pending a decision on a planning application at 1 April 2025. However, since then, 5 of these sites (a total of 1,638 homes), have been granted planning permission (after the monitoring period for the SHLAA)³³. 10% of the housing

³³Post-April 2025.

land supply has extant planning permission and 15% was under construction (at 1 April 2025).

Table 4: Breakdown of sites in the Housing Land Supply (by planning status)

Sites	Number of Sites	Number of Homes	% of total Housing Land Supply
No extant planning permission/ not under construction	135	7,462	60%
Subject of a planning application pending decision (at 1 April 2025)	9	1,845	15%
Extant planning permission	128	1,192	10%
Under construction	144	1,865	15%
Total	416	12,364	100%

- 3.50. Whilst a large portion of the housing land supply is made up of sites which currently sit outside of the planning system (without an extant planning permission/ which are not under construction), these sites have undergone a site assessment as part of the SHLAA to determine the suitability, availability and achievability (including economic viability). Appendix 3 of the SHLAA sets this out for sites within the Potential and Pending category.

Appendix 1 – Housing Land Supply Evidence

- 3.51. In addition to the SHLAA, the housing land supply has been presented in further detail in Appendix 1 of this topic paper to support the Publication Plan.
- 3.52. The purpose of Appendix 1 is to demonstrate the deliverability of the housing land supply. In addition, the appendix also identifies the housing land supply which is anticipated to have completed during the plan period but prior to anticipated adoption of the Local Plan (estimated as 2027/28), and for the remainder of the plan period (up to 2039) and beyond.
- 3.53. Appendix 1 is based on the housing land supply update/ SHLAA update for 2025 for future housing land supply (i.e. from April 2025), although it uses actual completions data from 2022-2025. Completions are only shown for sites which are still identified within the future housing land supply i.e. sites which have had plot completions during 2022-2025, but there are also still plots under construction. It does not include sites which have completed in their entirety and no longer form part of the future housing land supply. Total completions for years 2022/23, 2023/24 and 2024/25 are set out in Table 2 above.
- 3.54. During the plan period, but prior to the (anticipated) adoption of the Local Plan (in 2027/28), 2,855 dwellings are expected to have been delivered. This includes 1,401 houses which completed between 2022/23 to 2024/25, and the projected supply for 2025/26 and 2026/27 which is anticipated at 1,454 homes (before allowances).
- 3.55. Turning to the supply following the anticipated adoption of the Plan, as per paragraph 76 of NPPF, Local Planning Authorities are not required to 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: (a) their adopted plan is less than five years old; and (b) that adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded. At the time of the anticipated adoption PpE will still be less than five years old (being adopted on 21 March 2024) and it identified a five-year supply of specific deliverable sites. Nevertheless, the SHLAA (and Appendix 1) illustrates the five-year housing land supply for information to help explain the overall position.

- 3.56. Appendix 1 sets out that there is an identified supply (based on the 2025 SHLAA update) of 5,370 homes in the five years following the anticipated adoption of the Local Plan (2027/28 to 2031/32). This represents 150% of our housing requirement for this period (a total of 3,584 homes), before any allowances are applied. Whilst the supply is indicative and subject to change, especially when projecting into the medium and long-term periods, this is positive and demonstrates that our housing requirement can be met, with a significant buffer for flexibility included.
- 3.57. Beyond this, Appendix 1 identifies that there expected to be 5,035 homes delivered between 2032/33 and 2038/39 and that 506 homes are anticipated to be delivered post plan period (beyond 2039).
- 3.58. Appendix 1 also provides detail on the following to inform deliverability considerations:
 - Ownership and availability – where known, information is provided on site ownership and availability.
 - Developer interest – where known, detail is provided on whether the site has developer interest, or site history indicates that there could be developer interest in the future.
 - Site desktop assessment – a desktop assessment which considered site specific constraints, designations and development considerations has been carried out. A summary is provided in the appendix.
 - Public transport accessibility – the desktop assessment included an assessment of public transport accessibility to the site. A summary is provided in the appendix.
 - Viability – details of site viability, including the viability area the site is located within, and potential viability issues is provided, where known.
 - Infrastructure provision – details of site-specific infrastructure considerations is provided where known.
 - Planning permission – details of relevant planning history is provided.
 - Progress towards planning applications/ discharge of conditions etc. is provided, where known/ applicable.
- 3.59. Supply becomes less certain in the longer term, especially the post-plan period, however annual updates to the housing land supply through the SHLAA will review and consider the deliverability of the medium and longer-term supply. More detailed information is included in Appendix 1 for sites within the short-term supply (i.e. the five-year supply from 1 April 2025).
- 3.60. The housing land supply will continue to be updated annually as the Local Plan progresses towards adoption.

Brownfield Land Register

3.61. Furthermore, as is required by the Town and Country Planning (Brownfield Land Register) Regulations (2017), Oldham maintains a Brownfield Land Register³⁴. Brownfield Land Registers intend to provide up-to-date and consistent information on previously developed land that considered appropriate for residential development. The Brownfield Register is a sub-set of the SHLAA. The Brownfield Register update for 2025 includes 190 sites. Further information on which sites are included within the Register is available on the Council's website.

Housing Density

3.62. Ensuring brownfield land is used efficiently means that less land will be required for housing development, thereby assisting the protection of our green spaces. It also ensures sustainability.

3.63. The Authorities Monitoring Report (AMR) monitors the density of completed dwellings. Table 5 shows the densities achieved on sites of five dwellings or more over the past five years (2020/21 to 2024/25).

Table 5: Housing densities achieved on schemes of 5 dwellings and more (2020/21 to 2024/25)

Year	2020/21	2021/22	2022/23	2023/24	2024/25
Total number of dwellings completed (on schemes of 5 dwellings and above)	295	432	359	362	521
Density	No %	No %	No %	No %	No %
Less than 30 dwellings per hectare	100 dwellings 34%	173 dwellings 40%	59 dwellings 15%	227 dwellings 54%	117 dwellings 20%
30 to 50 dwellings per hectare	100 dwellings 34%	162 dwellings 38%	151 dwellings 37%	72 dwellings 17%	166 dwellings 29%
Over 50 dwellings per hectare	95 dwellings 25%	97 dwellings 22%	149 dwellings 37%	121 dwellings 29%	295 dwellings 51%

3.64. As Table 5 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.

³⁴ Oldham Council Brownfield Land Register (2025 update), available at: https://www.oldham.gov.uk/info/201230/monitoring/3318/oldham_council_brownfield_land_register_methodology_2025

- 3.65. The SHLAA includes density figures for the future housing land supply. For under construction sites and sites with planning permission the density is known and recorded as such, however assumptions have been made for other sites (i.e. lapsed and stalled sites, potential and pending sites and UDP saved housing allocations). Assumptions are made based on available evidence and indicative site areas and capacities (further information is set out in section 4 of the SHLAA document).
- 3.66. Although the density figures are indicative (in some cases), in terms of the future housing land supply (as at 1 April 2025), approximately:
- 51% of dwellings are expected to be delivered on 191 sites which have a density of over 50 dwellings per hectare;
 - 20% of dwellings are expected to be delivered on 100 sites which have a density of 30-50 dwellings per hectare;
 - 13% of dwellings are expected to be delivered on 120 sites which have a density of less than 30 dwellings per hectare;
 - A further 16% dwellings will be delivered on sites where the density is not yet known – this mainly includes the PfE Strategic Allocations where density will be refined as masterplans or development proposals progress/ come forward.
- 3.67. The indicative figures show that over half of the anticipated future housing land supply is on sites with a density of over 50 dwellings per hectare. 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.

Housing Mix

- 3.68. It is important to ensure the delivery of a mix of housing suitable to meet a range of the borough's housing needs and which provides housing choice and diversity.
- 3.69. The LHNA (2024) has identified that in Oldham 77.5% of dwellings are houses (44.7% terraced, 24.8% semi-detached, and 8.0% detached), 12.9% are flats and 9.6% are bungalows; and 8.9% of dwellings have one bedroom, 43.3% have two bedrooms, 38.6% have three bedrooms, and 9.2% have four or more bedrooms.
- 3.70. Inner Oldham is typically made up of smaller homes, including flats and terraced properties, whilst areas on the edge of the borough and more suburban areas tend to be made up of larger properties, including semi-detached and detached properties.
- 3.71. The LHNA (2024) 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 addition, there is an outward migration of young people, and as such there is a need to ensure there is an attractive housing offer available in the borough to retain and attract young people.
- 3.72. 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.
- 3.73. To understand what type and size of homes are needed in the borough, the LHNA (2024) has provided an analysis of housing mix underpinned by a demographic

scenario model which takes into account projected household change to 2041 (using 2018-based ONS household projections).

- 3.74. Based on this, the LHNA has provided recommendations for overall housing type and mix (Table 5.1 of the LHNA), as is summarised in Table 6 below.
- 3.75. To support flexibility in delivery, dwelling type and mix by tenure is presented as a broad range which also considers household aspirations and expectations.
- 3.76. The table recommends an overall split of housing tenure of 80% market housing and 20% affordable housing - affordable housing tenure broken down further as 12% social/ affordable rent and 8% affordable home ownership (as defined by NPPF Annex 2 'Glossary').

Table 6: Summary of Overall Dwelling Type/ Size and Mix by Tenure³⁵

Dwelling type/ size	Market	Affordable/ Social rented	Affordable home ownership	Total
Overall % split	80%	12%	8%	100%
Dwelling type				
House	70-75%	35-40%	65-70%	60-65%
Flat	2-5%	30-35%	15-20%	10-15%
Bungalow/ level access	25-30%	30-35%	15-20%	25-30%
Size (bedrooms)				
1-2	30-35%	70-75%	35-40%	40-45%
3	40-45%	20-25%	40-45%	35-40%
4+	25-30%	5-10%	20-25%	20-25%

- 3.77. Table 6 shows that for market sale dwellings and affordable home ownership tenures, the majority (70-75% / 65-70%) of homes should be houses and provide a mix of sizes (number of bedrooms). For affordable/ social rented dwellings there should be a mix of house types (house, flat and bungalow/ level access), but with a focus on smaller dwellings of 1-2 bedrooms.
- 3.78. The LHNA has identified a need for level-access homes and bungalows to meet the needs of older people and disabled people. The LHNA has identified that approximately 25-30% of the overall housing mix should be for level-access homes or bungalows, to meet local housing needs. There is a greater need for bungalows/ level access homes of affordable/ social rented tenures, compared to market homes and affordable home ownership. The area with the greatest need for level-access homes is the north district.
- 3.79. Overall, the housing mix identified is focused on houses with a lesser number of flats and bungalows/ level-access homes, and a range of house sizes, with a slightly higher proportion of 1-2 bedroomed homes.
- 3.80. Table 5.2 in the LHNA provides a further breakdown of the recommended housing mix for each tenure by district, including for Oldham Town Centre. A significant

³⁵ Adapted from Table 5.1 of the LHNA (2024).

proportion of Oldham's future housing land supply (around 3,400 homes) is expected to be delivered within Oldham Town Centre. As such, it is important that this housing is attractive, diverse and contributes to meeting Oldham's housing needs. In line with PfE policy JP-H4 (and Policy H2 of the Local Plan), the majority of housing within Oldham Town Centre will be for apartments, ensuring an appropriate density is achieved. However, the LHNA has also identified a need for houses within Oldham Town Centre, including larger homes of 3 and 4 beds.

Self-Build and Custom Housebuilding

- 3.81. There is also 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.
- 3.82. As required by national planning policy, the Council maintain a Self-Build and Custom Housebuilding Register of individuals or groups seeking plots to build their own homes within the borough. The latest published position is for the base period 31 October 2023 to 30 October 2024³⁶. At the end of this base period there were 550 individuals (and zero groups) on the authorities register.
- 3.83. 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. In this context it is considered a permission is only "suitable" if it relates to a serviced plot, meaning a plot with access to a public highway (or arrangements to secure future access), and utilities (water, electricity, wastewater), or clear arrangements for them to be provided. The permission should also be capable of being implemented by an individual self-builder.
- 3.84. At the base period of 31 October 2020 to 30 October 2021 there were 98 individuals added to the register (and a total of 424 individuals on the register). In the three years since this base period, a total of 104 permissions have been granted for plots suitable for self and custom build. Whilst this is sufficient for the number of people added to the register for the base period (31 October 2020 to 30 October 2021) (98 people) it cannot meet the overall numbers of individuals on the register. This represents the challenge of granting permission for sufficient plots for self and custom build housing demand.
- 3.85. Although, it must be noted that some individuals on the register may no longer wish to self/ custom build or may have found opportunities themselves.
- 3.86. As part of the LHNA update (2024), a survey was carried out with those on the authorities Self-Build and Custom Housebuilding Register (where sufficient contact details were provided). 15 responses were received, of these:
 - 14 said they were still intending to self/ custom build – 1 said they were no longer were intending to self/ custom build.

³⁶ <https://www.gov.uk/government/publications/self-build-and-custom-housebuilding-data>

- 10 said they would prefer to build on their own, whilst 2 would consider any option (including building as part of a group or on their own), 1 said they would prefer to be part of a community-led scheme, and 1 needed the Council to build a wheelchair-adapted property.
- A total of 20 locations were identified by respondents as preferred locations: Saddleworth (4), Chadderton (3), Woodhouses (2), Royton (2), Coldhurst (1), Coppice (1), Failsworth (1), Glodwick (1), Werneth (2) and Westwood (1). 2 respondents noted they would be open to any location.
- In terms of the preferred size/ type of property/ plot, there was several types stated including detached homes, bungalows and eco-homes.
- In terms of the reasons stated for respondents wanting to self/ custom build, the most important reasons were cost and location, with accessibility and community the least important.

3.87. Further analysis in relation to the above is set out within the LHNA (2024).

3.88. The survey response rate was low, and whilst this does not indicate that individuals on the register are not interested in self-build and custom housebuilding, it does demonstrate that it can be difficult to engage with such individuals.

3.89. The LHNA concluded that self-build can be used to provide appropriate accommodation to meet specific family needs and provide for vulnerable people; develop environmentally friendly, sustainable, built-to-last, well-designed energy efficient homes; and help support community sustainability.

Housing Standards

3.90. PfE Policy JP-H3 requires that all dwellings must comply with the National Described Space Standards (NDSS) and be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations unless specific site conditions make this impracticable.

3.91. In 2015 the government published the Technical Housing Standards - Nationally Described Space Standards (NDSS)³⁷. 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.

3.92. As set out above, the LHNA has identified that some areas in Oldham are experiencing overcrowded households. The 2021 Census identified that 7.5% of households in Oldham are overcrowded compared to 4.4% nationally.

3.93. There is also a historic legacy of smaller terraced dwellings, particularly within inner Oldham. Oldham has the highest proportion of terraced housing stock in Greater Manchester and a large portion is within inner Oldham³⁸. There is also a need to

³⁷ <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard/technical-housing-standards-nationally-described-space-standard>

³⁸ See Map 2.1 in LHNA (2024).

accommodate intergenerational families living together. As such, it is important to ensure that as well as new housing being of high quality and fit-for-purpose that they also provide the appropriate internal space.

- 3.94. In terms of the M4(2) adaptable and accessible requirement, the LHNA has identified that Oldham has an ageing population. The LHNA household survey has identified that many older people want to remain in their own homes with adaptations as necessary to support them (51% of respondents). The borough also has increasing numbers of people with a mobility disability (with the increase mainly owing to the increasing numbers of people aged over 65). There is also a need for increased provision of specialist accommodation (this is considered further later in this section). In this context, in-home adaptations are important to ensure that people can stay in their own homes and maintain independent living.
- 3.95. Therefore, providing homes which meet the M4(2) adaptable and accessible standard 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.

Affordable Housing

Affordable Housing Delivery

- 3.96. Table 7 below sets out the number of affordable homes delivered in the borough over a ten-year period (2015/16 to 2024/25).

Table 7: Affordable Housing Completions

Year	Number of Affordable Homes Delivered (new build only)
2015/16	20
2016/17	60
2017/18	42
2018/19	90
2019/20	176
2020/21	129
2021/22	173
2022/23	165
2023/24	121
2024/25	216
Total	1,192

- 3.97. Table 7 shows that affordable housing delivery was much lower between 2015-2019, however since 2019 the number of affordable homes being delivered has increased.
- 3.98. Affordable housing delivery is set out within the AMR³⁹ each year. The PfE Monitoring Report also measures affordable housing delivery; however, it uses an alternative source of data – ‘Affordable housing supply in England’⁴⁰ – which includes new build affordable housing and acquisitions (a private sector property that has been purchased for use as an affordable home). Based on this source, 221 affordable homes have been delivered in Oldham during 2024/25.

Affordable Housing Needs

- 3.99. The LHNA (2024) provides updated evidence on the need for affordable housing across the borough.
- 3.100. In terms of affordability, the LHNA has considered the relative cost of alternative housing options across the borough and sub-areas from two perspectives. Firstly, analysis considers prevailing prices at housing market sub-area level across a range of market and affordable tenures and the incomes required to afford these properties. Secondly, analysis considers what is genuinely affordable to households based on local incomes and assumptions around the proportion of income that should be spent on renting (assumed as up to 25% of gross household income) and the multiples of income for buying (assumed as up to 3.5 times gross household income). The analysis also considers the incomes of selected key workers and those on minimum and living wages.
- 3.101. Tables 3.10 and 3.11 of the LHNA identify the results of the analysis. They indicate that for buying, no areas of the borough are considered affordable (they all require a multiple of income more than 3.5 times gross household income); and for renting, only one area of the borough – East district – is considered to be affordable (with all other areas requiring more than 25% of gross household income). In relation to buying, there are affordability pressures in the South and West districts and for renting in the South district. Without substantial deposits, the ability to buy is a challenge to many households.
- 3.102. Analysis also found that key workers on entry-level grades are generally having to spend more than 25% of their income on rent. Private renting was generally unaffordable for those in key worker occupations and those on minimum or living wage, with most having to spend more than 25% of income on rent.
- 3.103. The analysis indicates that only social renting is affordable for households with lower quartile earners. For households with median income earners, a broader range of tenure options are available, including open market renting, lower quartile purchase, and a range of intermediate tenure options.
- 3.104. Table 3.14 of the LHNA identified what is considered genuinely affordable rents and purchase prices by district.

³⁹ Authorities Monitoring Report (latest update 2024/25), available at:

https://www.oldham.gov.uk/info/201230/monitoring/263/oldhams_monitoring_report

⁴⁰ Affordable Housing Supply in England – table 1011, <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply#open-data>

- 3.105. The LHNA has identified a net shortfall of affordable housing of 669 homes each year. Modelling assumes this is the shortfall each year, over a 10-year period. This is a marked increase on the 203 homes each year as reported in the 2018 LHNA and reflects the overall increase in need and the increasing cost of the private rented sector.
- 3.106. The planning process is only expected to support a proportion of this need, as the bulk of affordable homes will be delivered by registered providers either through acquisition or through new build development (of sites which are for affordable housing exclusively).
- 3.107. The LHNA (2024) has found that there are disparities in the affordability of housing in parts of the borough, with some areas distinctly lacking adequate affordable housing provision to meet local needs. There are also deficiencies in smaller accommodation in the form of 2 and 3 bed houses. However, this is indicative of a lack of choice in the market and respondents' expectations, as Oldham's local housing register indicates a need for larger family housing in certain areas of the borough also.
- 3.108. There are issues with attracting and retaining young professionals and families. In some parts of the borough, there are not enough affordable homes for people to live in the area in which they grew up, leading to an out-migration of these households to neighbouring boroughs. There is also a lack of smaller single person affordable housing and affordable housing for older people and disabled people. Suitable affordable housing should also be provided for key workers.
- 3.109. Based on this evidence, the LHNA recommends an overall split of housing tenure of 80% market housing and 20% affordable housing – affordable housing tenure broken down further as 12% social/ affordable rent and 8% affordable home ownership (see Table 1 above, and Table 5.1 of the LHNA).
- 3.110. Considering the split of affordable housing tenure further, the LHNA analysis has considered the range of affordable tenures that may be appropriate for existing households in need and newly-forming households. The affordable housing tenure preferences for the borough are shown in Table 8 below. This is adapted from Table C13 of the LHNA, which also sets out affordable housing tenure preferences at a district level.

Table 8: Affordable Housing Tenure Preferences

	Social Rented	Affordable Rented	Affordable Home Ownership	Total
Oldham Borough	43.0%	24.4%	32.6%	100%

- 3.111. In calculating the tenure mix, analysis has considered the tenure preferences and incomes of existing and newly-forming households. It also recognises the increased emphasis at a national level on delivering social rented affordable dwellings as part of new affordable housing supply.
- 3.112. In terms of the specific housing mix for affordable housing, Table 6 above sets this out.

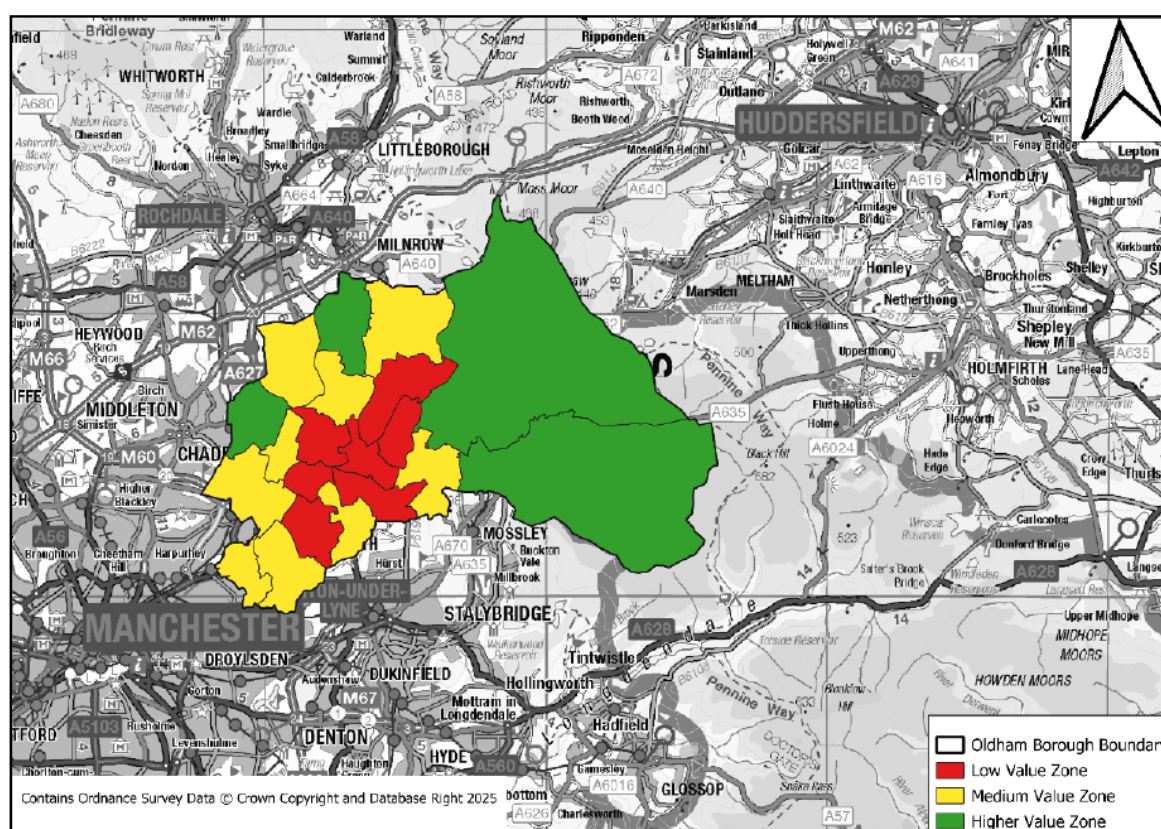
Viability (Affordable Housing)

- 3.113. Viability is a key consideration for affordable housing policy. The Local Plan Viability Assessment (2025) has tested the viability of the Local Plan policies. The general principle for the assessment is that planning obligations including affordable housing (etc.) will be levied on the increase in land value resulting from the grant of planning permission. However, as there are fundamental differences between the land economics of brownfield and greenfield sites, several types of development across different types of land (typologies) have been tested.
- 3.114. The typologies tested in terms of residential development included housing schemes of the following sizes:
- 9 units
 - 25 units
 - 50 units
 - 100 units (tested as high density – a mix of houses and apartments)
 - 200 units
 - 400 units
 - 600 units
- 3.115. These schemes have been tested as brownfield sites, greenfield sites and Green Belt sites⁴¹. A 20% affordable housing target was tested for brownfield sites and greenfield sites, yet the sensitivity analysis (see Appendix 7 of the Viability Assessment) for each typology shows the amount of affordable that could be afforded, ranging from 10% to 40%. Green Belt was tested at 50% affordable housing in line with the NPPF 'Golden Rules'. The 9-unit typology did not assume any affordable housing will be provided, in line with policy requirements⁴².
- 3.116. The Viability Assessment identified housing market value areas within the borough. These are shown in Figure 4 below.

⁴¹ Although this Plan does not allocate any sites (Places for Everyone allocations established separately). In line with the NPPF, the Council may receive applications for sites within the Green Belt in the future, as such the typologies have been tested to give a guide on how to appraise them at a site-specific level. Any future consideration of such sites would need to align with the revised NPPF 'Golden Rules' and the related guidance in the Viability PPG.

⁴² However, this is not to say that non-major sites cannot deliver affordable housing. Small sites have delivered affordable housing in Oldham in the past and this is welcomed.

Figure 4: Oldham Housing Market Value Areas⁴³



3.117. A scheme is found to be viable if the Gross Development Value (GDV) is greater than the total of all the costs of development including land, development costs, cumulative policy costs and profit (developers return). Conversely, if the GDV is less than the total costs of development, the scheme will be found unviable.

3.118. It should be noted that the Viability Assessment uses costs which are considered to be 'worst-case' scenario⁴⁴. Many of the assumptions are considered cumulatively negative and there is scope for some flexibility and pragmatism to the application of policies in the Plan. For example, the worst-case scenario appraisals assume generous allowances for profit and land value, do not consider the growth in values created by local energy homes and new markets as a result of wider regeneration. Nor do they consider emerging construction cost savings as new low carbon/ energy building technologies become embedded in the construction sector.

3.119. The Viability Assessment provides a full explanation of the methodology used and the assessment is discussed in more detail in the Infrastructure and Delivery Topic Paper. Below is a summary of the implications for affordable housing policy, as is relevant to this topic paper.

3.120. For brownfield sites, the testing found that:

⁴³ Source: Aspinall Verdi/ QGIS (adapted from figure 5.4, Oldham Local Plan Viability Assessment 2025).

⁴⁴ See section 6 of the Oldham Local Plan Viability Assessment (2025) for further information on the cost assumptions used.

- All schemes in the lower value zones are unviable when tested against the assumed costs. Grant funding would be required to support the schemes and improve viability.
- In the medium value zones all schemes, except the 100-unit scheme, are marginally viable, however some schemes would require a modest increase in market values or a decrease in build costs, and some grant funding.
- In the high value zones all schemes, except the 100-unit scheme, are viable, and could support significantly higher section 106 policy costs (up to £14,000 per unit) than the average assumption (£5,500 per unit) applied in the general testing. On the 100-unit scheme, to achieve 15% affordable housing a grant of £55,000 per unit would be required to make the scheme viable.

3.121. For greenfield sites, the testing found that:

- All schemes in the lower value zones are unviable when tested against the assumed costs. Grant funding would be required to support the schemes and improve viability.
- In the medium value zones all schemes, except the 100-unit scheme, are marginally viable, however some schemes would require a modest increase in market values or a decrease in build costs, and some grant funding.
- In the high value zones all schemes, except the 100-unit scheme, are viable, and could support significantly higher section 106 policy costs (up to £14,000 per unit) than the average assumption (£5,500 per unit) applied in the general testing. On the 100-unit scheme, to achieve 20% affordable housing a grant of £45,000 per unit would be required to make the scheme viable.

3.122. For Green Belt sites (assuming 50% of the site is for affordable housing, except for minor sites), the testing found that:

- All schemes within the lower value areas are unviable. Most schemes required grant funding (of between £50,000 and £55,000 per unit) and a reduction of affordable housing to between 20%, 30% or 35%. No sensitivity scenario would make the 100-unit scheme viable.
- Within the medium value zones, 9-unit schemes were found to be marginally viable (as they didn't require affordable housing), however all other schemes were unviable. Most schemes required grant funding (of between £20,000 and £25,000 per unit), a modest reduction in build costs and/or an increase in market values, and a reduction of affordable housing to around 20%. No sensitivity scenario would make the 100-unit scheme viable.
- Within the high value zones, all schemes are viable, except the 100-unit scheme (which required grant funding of £55,000 per unit to be viable).

3.123. The difficult viability for the 100-unit scheme typology is largely due to the type of development that was tested for this scenario. The 100-unit typology assumed a mix of high-density houses and flats, compared to solely houses which were tested in the other scenarios, to provide an alternative type of development analysis. Compared to other types of development, there are abnormal build costs associated

with flats which have contributed to increased costs overall and therefore difficult viability outcomes.

- 3.124. In reality, schemes will have different build costs, policy costs and land values and therefore the assessment provides an indication for planning policy preparation purposes but is not absolute. It does not necessarily mean that 100-unit developments or developments with a mix of house types would be unviable, but it highlights that flexibility should be included in the policy to allow for site specific viability issues to be considered, as appropriate.
- 3.125. For residential development, the overall recommendations of the Viability Assessment were that a balance is required between deciding on a broadly achievable affordable housing requirement whilst also not discouraging development. It recognised that NPPF does not specify a minimum affordable housing target anymore, making it difficult to recommend appropriate requirements.
- 3.126. It noted that brownfield sites are particularly challenging for viability, especially for sites within the lower and medium value zones. The recommendations recognise that affordable housing needs may be highest within these areas, and that residential development including affordable housing has been delivered in these areas in the past. As such, it may still be appropriate to include a policy which requires some affordable housing in these areas. Also, as the requirement is set at the outset of the plan, changing market conditions could contribute to a change in viability.
- 3.127. Higher value areas are more viable and could likely support a higher requirement than the lower value areas for brownfield sites. The assessment stated that high value zones should be able to afford a 20% affordable housing requirement (including s106 policy costs).
- 3.128. For greenfield typologies, viability also remains challenging in most of the value zones, however a requirement is still recommended for low and medium value areas, as some schemes can afford up to 5% affordable housing (not including s106 policy costs). Within the higher value zones, schemes can afford more than 20% affordable housing in most cases.
- 3.129. For Green Belt, the assessment notes that whilst the 50% requirement is not generally viable, in line with NPPF, a target could be set which is lower than 50% but higher than non-Green Belt land requirements, to support viability.
- 3.130. Finally, the assessment highlights that the lack of viability in some parts of the borough is largely due to the high build costs and lower sales values across Oldham. It notes that across the plan-period both land values and build costs are likely to experience changes, which may lead to a shift in the viability position across the area. Other proactive interventions in the market to deliver housing should be considered (including partnering with Registered Providers, use of grant funding and other regeneration funding streams).

Specialist Housing Provision

Older People

- 3.131. 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.
- 3.132. As set out earlier, Oldham has an ageing population. Oldham Council's Market Position Statement (MPS) identifies that there are approximately 39,000 people aged 65 and over living in Oldham currently, which is expected to increase by 26.62% to over 49,500 people by 2040. Also, the number of people in Oldham over the age of 85 is projected to increase by 43% by 2040. Between 2023 and 2040 there is an expected increase of 38.4% in people over 65 with dementia.
- 3.133. Oldham's MPS sets out that there are 1,600 bedspaces in residential care and 254 Extra Care units. There are also people supported at home and 190 supported living beds.
- 3.134. The MPS sets out that Oldham's care home population is expected to increase from 1,708 beds required in 2023 to 2,040 beds by 2040. An additional 741 Extra Care units are also expected by 2041. The MPS also highlights that there are increasing complex needs to be accommodated at home (by at home care packages), a current shortfall of care home beds and some limitations on the adaptability and suitability of the current provision of Extra Care units.
- 3.135. The LHNA (2024) also sets out data on specialist care provision for older people. It identifies that there are around 3,275 units/bedspaces of specialist older persons accommodation comprising, 2,115 specialist older accommodation units (C3 planning use class), 227 Extra Care (C2 use class), and 933 bedspaces residential care (C2 use class)⁴⁵.
- 3.136. Considering the needs for different accommodation and to support the needs for older people⁴⁶, the LHNA identifies that between 2022 and 2041 there is:
- A need for an additional 775 residential care bedspaces or 41 each year.
 - A need for an additional 955 Extra Care units or 50 each year.
 - A net need for 3,139 additional specialist older person dwelling units or 165 each year.
- 3.137. There is a particular need for leasehold sheltered housing, enhanced sheltered, and Extra Care housing for sale. Oldham has a good supply of dementia-friendly older persons accommodation through existing provision.

⁴⁵ This data is gathered from the Education Accommodation Council in 2023.

⁴⁶ Based on the latest metrics provided by the Housing Learning and Information Exchange (see LHNA table 4.4).

- 3.138. The data set out in the MPS and the LHNA differ slightly. This is due to varying data sources, differences in the definitions of specialist care, and how the units have been categorised. However, both sources show that given the ageing population of the borough, the need for specialist older person accommodation is expected to increase over the plan period and at present for most types of provision, supply cannot keep up with demand.
- 3.139. As such there is a need to support the delivery of housing suitable for older people, including at home adaptations and support. In addition, to planning policy, this will be done through the care sector, the local authority and private funding.

Disabled People

- 3.140. Oldham's MPS identifies that there are expected to be significant increases in the number of people aged 18-24 with a serious personal care disability by 2040, meaning projected support needs are also expected to increase. Also, the number of people aged over 65 projected to need help with domestic tasks or self-care activities is expected to increase significantly in the same timeframe. The MPS also identifies that in 2023 there were estimated to be 795 adults with a moderate or severe learning disability in Oldham – this is expected to increase by over 6% to 846 adults in 2040.
- 3.141. The LHNA (2024) also considers housing needs of people with disabilities and additional needs. It identifies that there is expected to be an increase in the number of households experiencing a disability in Oldham over the plan period. Around 48,800 people reported as experiencing a disability in 2022 - this represented 20% of households in Oldham. This is expected to increase by 14.7% by 2041, which represents an additional 7,200 people experiencing an illness or disability.
- 3.142. The LHNA sets out the types of wheelchair dwellings needed (see LHNA Table 4.16). It identifies that these types of properties are mainly needed for people aged under 65 (72%), with lesser amounts needed for those aged over 65 (28%). This could be indicative of existing provision being focused on older people. Considering the demographic profile and levels of disability, to meet needs the LHNA recommends that 5% of new dwellings are built to M4(3) wheelchair accessible standard (an average of around 34 each year over the plan period).
- 3.143. In addition, the number of people across all age groups with moderate or severe learning disabilities was estimated to be around 908 in 2023, rising to 980 by 2041⁴⁷. There is a notable growth in the number of people aged 65 and over with learning disabilities. There is also expected to be an increase over the plan period in the number of people with autism spectrum disorders and people experiencing a mental health disorder.
- 3.144. Given the evidence set out in the MPS and the LHNA there is a need for more wheelchair accessible homes and appropriate housing for those with other physical disabilities, dementia, a learning disability and mental health disorders.
- 3.145. 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

⁴⁷ This figure differs slightly to that set out in the MPS, as previously explained this is likely due to the use of differing sources of information. Nevertheless, both sources show an increase in need.

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.

Children and Care Leavers

- 3.146. Caring for looked after children is a key part of the Council's role. Oldham's Joint Strategic Needs Assessment (JSNA, 2024)⁴⁸ sets out that as of 2023 Oldham had 597 Children Looked After (CLA). A child is looked after by a local authority if they are provided with accommodation for a continuous period of more than 24 hours, are subject to a care order or are subject to a placement order. Oldham's latest 2023 rate of 86 children per 10,000 is higher than the England rate of 71 children per 10,000 but lower than the North-West average of 96 children per 10,000. When broken down by age band, Oldham has a higher proportion of its Children Looked After in the younger age bands (under 1 year, 1 to 4 years, 5 to 9 years) and a lower proportion in the older age bands (10 to 15 years, 16 years and over) compared to national averages. In general, Oldham also has a higher proportion (25%) of residents aged under 16 than the regional and national averages⁴⁹.
- 3.147. 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.
- 3.148. A children's residential care home is intended for the provision of care and is 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.
- 3.149. 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.
- 3.150. Oldham's JSNA (2024) identifies that as of August 2023, there were 294 young people classified as Care Leavers in Oldham. 92% of Oldham's 17 or 18 year old Care Leavers were in suitable accommodation for 2022/23, compared with 91% nationally and 92% regionally.

⁴⁸ Oldham Joint Strategic Needs Assessment, 2024, available at:

<https://www.jsnaoldham.co.uk/starting/childrens-social-care/>

⁴⁹ Source: Oldham in Profile - ONS 2011 Census, available at:

https://www.oldham.gov.uk/downloads/file/4740/oldham_in_profile_2017_pdf_format

- 3.151. For care leavers it is important to secure semi-independent accommodation and emergency accommodation, to support the numbers of young people moving from the care system into independence.
- 3.152. 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. 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.
- 3.153. In addition, the MPS has identified that there has been an increase in the numbers of younger adults (often transitioning from children's care 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. This may lead to a need for suitable accommodation for this group.

Houses in Multiple Occupation (HMOs)

- 3.154. The government defines a HMO as a property rented out by at least 3 people who are not from 1 'household' (for example a family) but share facilities like the bathroom and kitchen⁵⁰.
- 3.155. Under current planning legislation⁵¹, HMOs are divided into two Use Classes, which are often referred to as 'Small' and 'Large' HMOs:
- Small HMOs are houses or flats occupied by between 3 and 6 unrelated individuals who share basic amenities such as a kitchen or a bathroom. These are classified as a 'C4' use within the Use Classes Order; and
 - Large HMOs comprise houses or flats occupied by more than 6 unrelated individuals who share basic amenities such as a kitchen or bathroom. These are classified as Sui Generis (a use that does not fall in any use class).
- 3.156. HMOs can provide various types of accommodation including bedsits, a hostel, private halls of residence, a shared house, a block of converted flats and shared self-contained cluster flats.

⁵⁰ <https://www.gov.uk/find-licences/house-in-multiple-occupation-licence>

⁵¹ The Town and Country Planning (Use Classes) Order 1987 (as amended):
<https://www.legislation.gov.uk/ukxi/1987/764/contents?view=plain>

Article 4 Direction

- 3.157. Oldham Council has recently introduced an Article 4 Direction to remove the permitted development right for the change of use from dwelling houses (Use Class C3) to Houses in Multiple Occupation (HMOs) for up to six residents (Use Class C4)⁵².
- 3.158. The Article 4 Direction came into effect on 1 January 2026 and applies to the whole borough of Oldham.
- 3.159. The Direction will enable the Council to have greater control over the number, distribution and management of HMOs.
- 3.160. An evidence base document⁵³ was prepared to inform the making of the Direction. The following data has been gathered as part of that document.

HMO Data

- 3.161. At the 2021 Census the number of HMOs in Oldham was estimated to be 88⁵⁴. At the time this represented 0.09% of the borough's total housing stock (estimated at 97,761 dwellings). Nationally, at the 2021 Census, HMOs represented 0.07% of England's total housing stock. As such, at the time Oldham had a slightly higher number of HMOs than the national average.
- 3.162. 'In-house' monitoring of the number of HMOs in Oldham has been undertaken since 2020 to understand trends and impact on the borough's communities.
- 3.163. Over the years, data collection methods have been tested and refined to enable the collection of more accurate data. However, given existing permitted development rights, which allow the change of use of dwelling houses (C3 use) to small HMOs (C4 use), monitoring the number of HMOs can be difficult.
- 3.164. The data presented below has been gathered from a variety of sources, using several internal monitoring systems, including data from Licensing, Planning, Building Control, Council Tax, temporary accommodation records and the Local Land and Property Gazetteer. 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 based on the best available data.
- 3.165. As of July 2025, the total number of HMOs estimated to be in use/ existing in the borough is approximately 384 (81 of which have secured a HMO Licence or been issued a draft licence ready for the final licence to be issued, and 43 licensing applications are in the process of being considered).

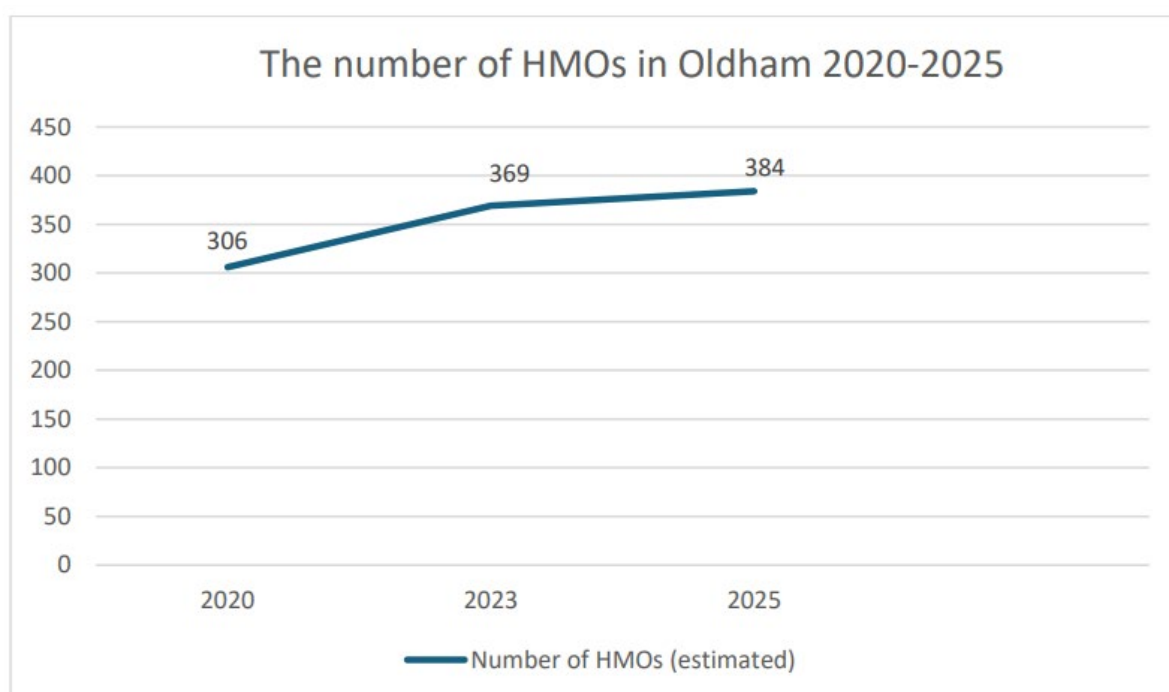
⁵² The Article 4 Direction is made under the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

⁵³ Article 4 Direction Background (evidence) Document (2025), available at: https://www.oldham.gov.uk/downloads/download/2449/article_4_direction_background_evidence_document

⁵⁴ ONS Census 2021 – Number of dwellings that are houses in multiple occupation (HMO): <https://www.ons.gov.uk/datasets/RM192/editions/2021/versions/2#summary>

- 3.166. The total number of HMOs (as of July 2025) represents 0.38% of the total dwelling stock (98,912 dwellings, as of October 2024⁵⁵). This is significantly higher than the national percentage of dwelling stock estimate for HMOs of 0.07% (2021 Census)⁵⁶.
- 3.167. Looking over a longer period, data on the number of HMOs in the borough was collected in December 2020 to inform the Local Plan Review – Issues and Options stage. That data identified that there were around 306 HMOs in the borough, which represented 0.31% of the borough's total housing stock at the time (97,079 dwellings as of October 2020).
- 3.168. In October 2023 the number of HMOs was estimated to be around 369, which represented 0.37% of the total housing stock at the time (98,567 dwellings).
- 3.169. Figure 5 below shows the consistent increase in the estimated number of HMOs in the borough between 2020 and 2025. It shows that overall, between December 2020 and July 2025 there has been a 25% increase in the estimated number of HMOs in the borough.

Figure 5: Number of HMOs in Oldham (2020-2025)



- 3.170. Despite the evidence set out above, the actual number of HMOs in the borough may still differ somewhat from that identified. Prior to the introduction of the Article 4 Direction the Council was not notified of all conversions of C3 dwellings to small HMOs (as this is currently permitted development). Whilst it would be hoped those small HMOs would be picked up through Council Tax records (and many are), this is not always the case, depending on what information has been provided by the

⁵⁵ Source – Oldham Council, Council Tax data (October 2024).

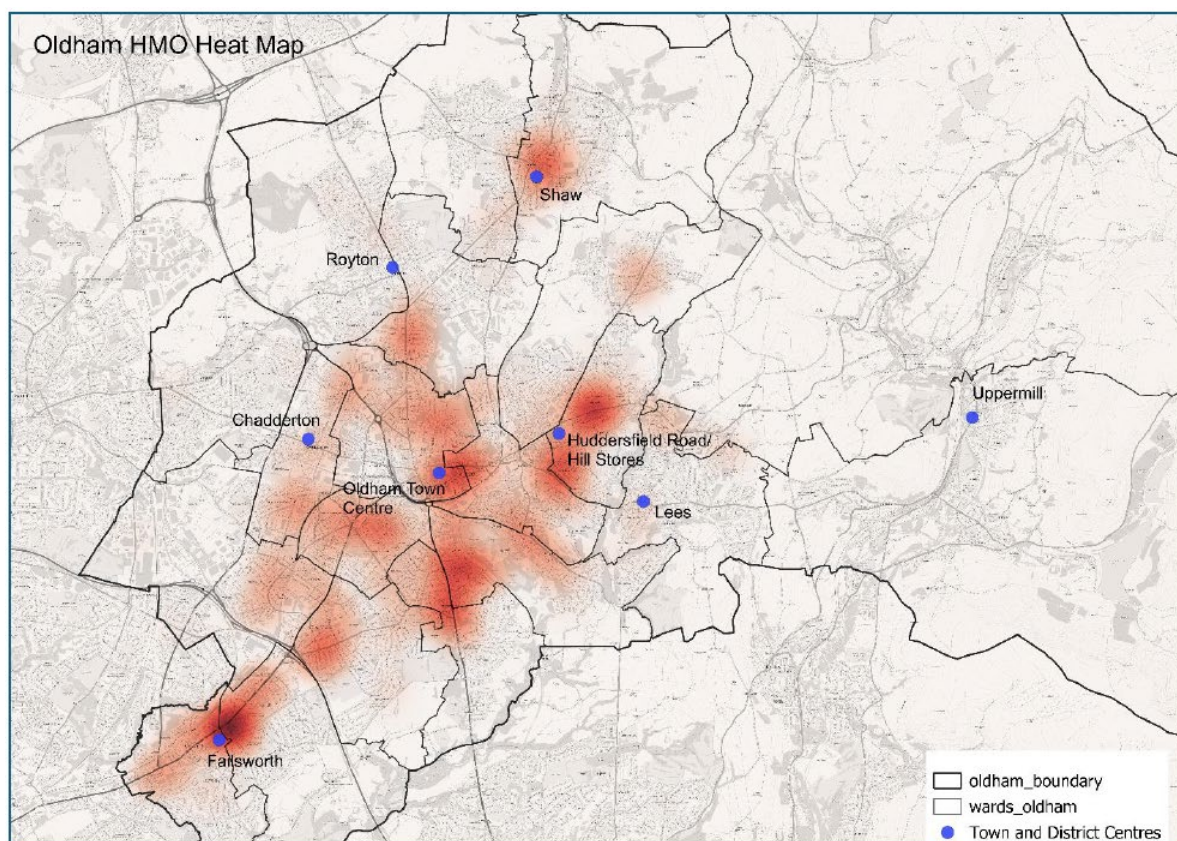
⁵⁶ The significant difference in the 2021 Census data on the number of HMOs in the borough (88 and the number recorded in 2025 by the Council (384) (and 306 in 2020, 369 in 2023) highlights the difficulty in accurately identifying the number of HMOs in the borough, especially where permitted development rights have been in place, prior to the introduction of the Article 4 Direction.

occupiers on Council Tax returns. Also, HMOs can still change back to single family dwellings without notifying the Council.

- 3.171. Over 48% (185 properties) of the total 384 HMOs have been converted from a single household dwelling to a HMO. This has resulted in an additional 47 bedrooms where a change of use from single household dwelling to HMO has occurred and bedroom numbers are known.
- 3.172. Whilst this does not always equate to a loss of a residential unit, (as per planning guidance some smaller HMOs can still exist under use class C3 – the same use class as a single household dwelling), it could mean the loss of a family home into smaller, single occupation uses.
- 3.173. The LHNA (2024) has identified a need for family housing, including larger family housing of 4+ bedrooms across the borough.
- 3.174. The loss of family homes and larger properties to HMOs can impact the dwelling stock available for families and the ability of the housing stock to meet local housing needs.
- 3.175. Lesser number of HMOs are converted from other uses including commercial (Class E), Local community uses (Class F2), Sui Generis uses⁵⁷, hotels and boarding houses (Class C1), residential accommodation/ care (Class C2) and storage and distribution (Class B8).
- 3.176. The heat map at Figure 6 illustrates the spatial distribution of the recorded HMOs in the borough, as of July 2025.

⁵⁷ Sui Generis use class includes large HMOs i.e. those for more than 6 unrelated individuals and also many other uses which do not fall within other defined use classes for example betting shops, launderettes, and nightclubs.

Figure 6: Heat map showing spatial distribution of HMOs in Oldham



- 3.177. As shown in Figure 6, HMOs are spread across many areas of the borough. There are clusters located within and around inner Oldham and along key transport routes.
- 3.178. There are clusters of HMOs within and around the centres of Failsworth, Hill Stores and Shaw and Oldham Town Centre, and within Greenacres/ Clarksfield and Hathershaw (along Ashton Road). There are also HMOs located near Royal Oldham Hospital (within Coldhurst and Royton South) - and within areas of Central and South Chadderton, Hollinwood and Werneth. Conversely there are very few HMOs located within Saddleworth wards, and the more rural areas of the Borough.
- 3.179. The majority of the borough's existing HMOs are in accessible locations. Just over half (193) of the borough's recorded HMOs are located within 800m of a Metrolink station/ train station (Mills Hill and Moston). The vast majority are within walking distance of a bus stop. Typically, HMOs can be a lower cost form of accommodation, and as such appeal to those with lower incomes where levels of car ownership are also likely to be lower. It is therefore important that HMOs are located sustainably with access to public transport within a suitable walking distance.
- 3.180. In terms of tenure, Many HMOs are rented privately. The private rented sector has become an important tenure in both meeting people's housing needs and providing flexible housing options for those moving for employment or to respond to changing circumstances and provides a housing option for those on low incomes.
- 3.181. Local authorities have an important enabling and regulatory role in ensuring that the private rented sector helps to meet housing need and encouraging good quality management.

- 3.182. The Article 4 Direction Background Paper also provided some analysis of demographic data and the spatial distribution of HMOs. It highlighted that there may be some links between the distribution of HMOs in the borough and higher levels of deprivation and overcrowding, as well as links between income levels, household types and house prices.
- 3.183. It is recognised that 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 is required. However, there is also a need for larger family housing.
- 3.184. Furthermore, extensive concentrations of HMO development can result in amenity issues and a change in the character of an area. Amenity and local character have a significant impact on the way in which people live and experience spaces. It is important that HMO 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.

Gypsy's, Traveller's and Travelling Show People

- 3.185. A Greater Manchester Gypsy and Traveller Accommodation Assessment (2024) has recently been published⁵⁸. This updates the 2018 Greater Manchester GTAA.
- 3.186. The GTAA provides the latest available evidence to identify the accommodation needs of Gypsies and Travellers across the local authority areas of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan.
- 3.187. The needs of Travelling Showpeople are presented in the 2018 GTAA and this remains appropriate evidence for the preparation of the Oldham Local Plan.
- 3.188. There is a minimum need for 109 additional Gypsy and Traveller pitches across Greater Manchester over the period 2023/24 to 2040/41. Of this need, 21 are needed in the first five years and 88 beyond this up to 2040/41. However, the latest evidence (2024 GTAA) identified no need for Gypsy and Traveller pitches in Oldham up to 2041. This remains the same as the findings of the 2018 GTAA in terms of need in Oldham.
- 3.189. For Travelling Showpeople, the 2018 assessment found a shortfall of 204 plots across Greater Manchester up to 2035/36, driven by household formation and overcrowding on existing yards. In addition, the need to provide for 59 transit pitches across the Greater Manchester study area was also identified.
- 3.190. Whilst there is no identified need for Gypsy and Traveller pitches in Oldham, it is recognised that additional need may arise over the plan period. Further work to understand and identify the spatial distribution of plots for Travelling Showpeople and transient pitches may also include the identification of specific sites in Oldham in the future.
- 3.191. The GTAA recommends ways to meet any identified need, including considering redistribution of need across Greater Manchester, and it also recommends that

⁵⁸ Greater Manchester GTAA (2024), available at: <https://www.greatermanchester-ca.gov.uk/media/jotblsr1/gmca-gtaa-final-report-08-11-24-accessible-for-publishing.pdf>

councils have criteria-based policies to inform future planning applications for private sites should they arise.

4. Housing and the Oldham Local Plan: Publication Plan

- 4.1. This section of the Topic Paper looks at each of the policies contained in the Housing chapter of the Oldham Local Plan: Publication Plan.
- 4.2. For each policy the Topic Paper shows how policies within the Oldham Local Plan: Publication Plan have been shaped to provide an appropriate strategy for the borough that is based on proportionate evidence and having regard to:
 - The key issues, challenges and opportunities facing the borough in relation to housing;
 - Responses received as part of the Oldham Local Plan: Draft Plan consultation and Duty to Co-operate discussions; and
 - The outcomes of the Integrated Assessment, including any requirements of the Habitat Regulations Assessment.

Policy H1: Delivering a Diverse and Sustainable Housing Offer

Summary of evidence

- 4.3. There is a need to deliver suitable high-quality housing for all residents of Oldham and at a scale that meets our housing requirement.
- 4.4. Oldham's local housing need (the number of new homes needed) is set out in Places for Everyone (PfE) Policy JP-H1. This sets out that Oldham is required to deliver a minimum of 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 and below:
 - 2022-2025 – 404 homes
 - 2025-230 – 680 homes
 - 2030-2039 – 772 homes
- 4.5. The housing requirement is calculated using the government's standard methodology for calculating local housing need, as was set out in NPPF (December 2020) – the version of the NPPF which applies to PfE.
- 4.6. The SHLAA sets out Oldham's housing land supply and is a key evidence base document informing the Local Plan and demonstrating how we intend to meet our housing requirement. The base date for the SHLAA that relates to the Local Plan (Publication Plan) is as of 1 April 2025.
- 4.7. Oldham's housing land supply (2025), set out within the SHLAA, identifies land to accommodate 12,364 homes over the plan period and beyond (see Table 3 above).
- 4.8. Looking at the plan period (2022-2039) specifically, 1,401 homes have been delivered between 2022/23 and 2024/25 (see Table 3). This leaves at least 10,159 homes to be delivered over the remaining plan period (2025/26 to 2038/39) to meet our overall housing requirement. The identified housing land supply (at 1 April 2025) identifies approximately 11,858 homes within the remaining plan period (before

allowances) capable of meeting our remaining minimum housing requirement, with an additional 1,699 homes.

- 4.9. Oldham's housing land supply identifies a range of sites, including large sites, smaller sites, and sites appropriate for change of use/ conversion (e.g. mills).
- 4.10. Whilst a large portion of the housing land supply is made up of sites which currently sit outside of the planning system (without an extant planning permission/ which are not under construction), these sites have undergone a site assessment as part of the SHLAA to determine the suitability, availability and achievability (including economic viability).
- 4.11. In addition to the SHLAA, the land supply has been presented in further detail in Appendix 1 of this topic paper. Appendix 1 provides a summary of the site deliverability (including a summary of a desktop assessment), provides further detail on the short, medium and long term supply, and sets out the anticipated housing land supply for years following anticipated adoption of the Local Plan (2027/28 onwards).
- 4.12. The majority of Oldham's housing land supply is made up of brownfield (previously developed) sites (60%) or mixed sites (which include both brownfield and greenfield land) (a further 14%). Just over a quarter of the housing land supply is greenfield sites (26%). This shows that the focus of the future housing land supply is for brownfield or mixed sites.
- 4.13. Oldham's housing land supply is updated annually.

Draft Local Plan Consultation and Duty to Co-operate

- 4.14. As part of the Draft Local Plan consultation, several responses were received to policy H1.
- 4.15. The comments received/ issues raised and the Council's response to these issues are summarised in Table 9 below.

Table 9: Draft Local Plan Consultation Summary and Response – Delivering a diverse and sustainable housing offer

Comment/ Issue Summary	Council Response
<p>The wording is currently ambiguous in that it suggests any/all sites identified in the SHLAA will be supported for development, however it does not reference the status or deliverability of SHLAA sites. The supporting text to the policy then continues to suggest that sites will be supported if they are previously developed whether they are identified or not in the SHLAA.</p> <p>Policies should encourage and allow for development of undesignated land, particularly smaller sites and those in more rural areas of the borough.</p>	<p>References to the SHLAA within the policy have been removed in the Publication Plan. The Reasoned Justification of the policy clarifies that the SHLAA can be a source for identifying suitable sites but that the policy supports the delivery of all housing (and mixed-use) development where the proposed development is consistent with national planning policy and guidance, PfE and other Local Plan policies.</p> <p>In addition, the policy text relating to previously developed land has been simplified – the Reasoned Justification clarifies that the development of previously developed land is important in supporting sustainable development but that it is important in meeting housing needs that all land in the housing land supply (including mixed and greenfield sites) is delivered.</p>
<p>Comments provided on the housing land supply (and its ability to meet housing need), including that there is an over-reliance on sites in the urban area; there is a need to identify large scale sites outside of the urban area; there is a lack of diversity in the land supply; more greenfield sites are needed.</p>	<p>The Reasoned Justification of the policy clarifies that the SHLAA can be a source for identifying suitable sites but that the policy supports the delivery of all housing development where the proposed development is consistent with national planning policy and guidance, PfE and other Local Plan policies.</p> <p>The identified housing land supply provides a range of sites (from small sites to large sites, including the PfE Strategic Allocations) in diverse locations (including within Oldham Town Centre and the borough's other centres, urban areas and urban-fringe areas). It also identifies sites for redevelopment and those suitable for conversion i.e. mills. It is considered that the housing land supply provides a diverse supply of housing, however as noted above other suitable sites may come forward.</p> <p>Whilst the majority of the borough's housing land supply is made up of brownfield sites (60%) or mixed sites (14%), over a quarter is made up of greenfield sites (26%). Supporting the delivery of brownfield (previously developed land) is central to achieving sustainable development and maximising our housing land supply.</p>

Comment/ Issue Summary	Council Response
	<p>However greenfield sites can still come forward for development where appropriate as set out above.</p> <p>The identified housing land supply is primarily located within the urban and urban fringe areas. However, many areas of the borough are constrained by Green Belt (surrounding much of the urban/ urban fringe areas), topography (e.g. parts of the East of the borough), available land supply and other policy constraints such as ecological designations (e.g. the South Pennine Moors) which have shaped the housing land supply. Moreover, in line with NPPF, it is important that housing is sustainably and accessibly located in delivering sustainable development - the urban area (and urban fringe areas to a lesser extent) is most able to support this, with better access to public transport, active travel options and services and facilities.</p>
<p>The Plan should identify more housing allocations.</p>	<p>The Publication Plan no longer includes site allocations (Policy H13 has been removed). This Plan is a 'part 2' Plan to PfE, which sets out Strategic Allocations for housing and mixed-use development in Oldham. This Plan also provides evidence of Oldham's housing land supply being sufficient to meet our housing need. As such, it is considered that housing (and mixed-use) allocations are not necessary.</p>
<p>Objects to the policy, too much money has been spent on social housing by the government. More money should be allocated to the NHS and Police services. Social housing is being abused by many people and should only be available to people in real need. Also have concerns about the impact of social housing on the environment and the preservation of Green Belt.</p>	<p>The purpose of the policy is to ensure an adequate supply of homes in Oldham. The comment doesn't relate to the content of the policy.</p>
<p>A clear distribution of housing should be provided in the plan and the lack of</p>	<p>The housing requirement for Oldham is set out in the adopted PfE Policy JP-H1. The housing requirement is for the whole of the borough, however the SHLAA identifies Oldham's housing land supply - details of the distribution can be found within the SHLAA documents. The SHLAA provides an indication of future</p>

Comment/ Issue Summary	Council Response
development in areas in most need (i.e. Saddleworth) addressed.	<p>housing land supply and sites identified within the housing land supply have been assessed based on the requirements set out within PPG (of being suitable, available and achievable).</p> <p>It should be noted that the housing land supply is indicative, especially into the medium and long term and therefore housing development may come forward in other areas and for different schemes than anticipated. For some parts of the borough (including parts of Saddleworth), development is constrained by Green Belt, topography, available land supply and other policy constraints such as ecological designations. As such, delivering an even distribution of land supply across the different areas of the borough is not possible. However, the SHLAA does identify a range of development sites, in a range of different locations to support the delivery of a diverse housing land supply.</p>
The policy should be amended to recognise that the housing requirement is a <i>minimum</i> requirement, in line with PfE policy JP-H1.	The Publication Plan policy has been amended in reference to the housing requirement being a 'minimum' figure, in line with PfE Policy JP-H1.
The approach to promoting a diverse housing supply is welcomed. The prioritisation of previously developed land is supported.	As set out in the policy Reasoned Justification, the redevelopment of brownfield land is central to achieving sustainable development and maximising our housing land supply and the Council will encourage the redevelopment of suitable brownfield land (the majority of sites identified within the SHLAA are brownfield), however there are also a number of sites which are made up of both brownfield and greenfield land, and also some greenfield sites. It is important in meeting our housing requirement and addressing local needs, that we deliver all sites within our housing land supply. This policy supports the delivery of the housing on other suitable sites that may become available.
Detailed evidence is required to demonstrate that the land supply is suitable, available and achievable.	The SHLAA (2025) contains a range of documents and appendices to evidence that the land supply is suitable, available and achievable (in line with PPG). In addition, to support the Publication Plan (namely this policy) Appendix 1 of this topic paper has been prepared to provide further detail on the housing land supply. This focuses on the five-year housing land supply (anticipated from

Comment/ Issue Summary	Council Response
	potential adoption of the Plan) but also provides detail on the medium and long-term supply.
There needs to be recognition that viability challenges may be present, especially with brownfield development, and so there is a need for flexibility to deliver such sites.	The policy sets out that 'planning applications for residential development, in whole or as part of a mixed-use scheme, will be permitted where the proposed development is consistent with national planning policy and guidance, PfE and other Local Plan policies.'. Policy IN2 provides further policy on when site specific viability assessments may be acceptable. As such, when reading the plan as a whole, it is considered that there is sufficient flexibility to allow for site-specific viability issues to be considered as part of applications.
It is important to consider highways and accessibility (including for brownfield sites such as JPA15) taking into account individual site circumstances.	<p>The policy supports development proposals that are in sustainable and accessible locations and that promote and encourage use of public transport, walking, wheeling and cycling. It requires that all development should be accessible by active travel and achieve Greater Manchester Accessibility Level (GMAL) 4 or above. However, it states that this should be met unless it can be demonstrated by the applicant that it is not appropriate, or the development provides exceptional benefits to the surrounding environment and community, therefore allowing for the consideration of individual site circumstances.</p> <p>In addition, as part of any relevant planning application, consultation will take place with highways colleagues, Transport for Greater Manchester and other relevant statutory bodies where appropriate.</p>
Support the development of brownfield land over greenfield, it is important to recognise that brown-field sites can provide biodiversity 'hot-spots' within the urban environment. The combination of semi-natural vegetation and hard surfaces can be especially important for invertebrate communities.	Support noted. The ecological value of brownfield sites will be considered as part of any planning application as is standard. This policy should be read alongside policies N1, N2 and N3 - which consider biodiversity and Green Infrastructure.

Comment/ Issue Summary	Council Response
<p>The Standard Method is based on flawed assumptions. Using old data inflates the housing and job requirements, needlessly accelerating loss of green fields in countryside.</p>	<p>Oldham's housing requirement, as set out in the Local Plan, has been dealt with as part of PfE. Oldham's Local Plan is a part 2 plan to PfE. The comment is therefore not relevant to this policy.</p>

- 4.16. One respondent also commented that the policy wording within the housing policies should include the need for development to take account of Active Design Guidance. In response to this comment, the housing policies should be read alongside Policy D1 which considers design for new development, including active design. The approach taken is sufficient to guide decision making on new development when the plan is read as a whole and so no amendments are required to any of the housing policies in this regard.
- 4.17. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.
- 4.18. There is no specific Duty to Cooperate issues associated with this policy. Duty to Co-operate in relation to the borough's housing requirement has been dealt with as part of PfE.

Policy Approach

- 4.19. Policy H1 provides an overarching statement of how the Council will promote a diverse housing offer to meet the differing needs of all Oldham's residents.
- 4.20. It reflects PfE Policy JP-H1, setting out Oldham's housing requirement for the plan period. It is considered necessary in this regard to provide context to Oldham's housing land supply and the other policies in the housing chapter.
- 4.21. As set out in Table 8, in response to the comments received as part of the Draft Local Plan consultation, Policy H1 has mainly been amended to clarify reference to the SHLAA and which sites will be supported for housing development (including previously developed land).
- 4.22. The Draft Local Plan Policy H1 set out that *'The Council will promote a diverse housing offer to meet the differing needs of all Oldham's residents. Planning applications for residential development, in whole or as part of a mixed-use scheme, will be permitted where:*
 - 1. The site is allocated for residential development through PfE or the Local Plan; or*
 - 2. The site is identified within the Strategic Housing Land Availability Assessment (SHLAA); or*
 - 3. The proposal is for small-scale development, comprising conversion or change of use of less than 10 dwellings.*

Proposed developments on sites identified within the SHLAA, and those not identified within the criteria above and where they are previously developed (brownfield), will be considered favourably where they comply with national planning policy and guidance, PfE and Local Plan policies.'
- 4.23. As set out above (Table 9), respondents commented that the reference to the SHLAA and what sites are supported for development was unclear and ambiguous. In response, in the Publication Plan policy, reference to the SHLAA in the policy has been removed, but the Reasoned Justification now references that the SHLAA can be used a source to identify suitable land for housing development. The policy has been simplified to note that *'housing or mixed-use development will be permitted where the proposed development is consistent with national planning policy and*

guidance, PfE and other Local Plan policies'. As such, considering the Reasoned Justification also, clarifying that other land not identified within the SHLAA can come forward where it is policy compliant.

- 4.24. Two other criteria in the Draft Plan policy (1 and 3) have also been removed as they were not considered to be needed with the simplification/ clarification of the policy wording (and Reasoned Justification) which supports policy compliant development. NPPF allows small scale development and change of use/ conversions.
- 4.25. Similarly to the Draft Plan policy, the policy continues to support the delivery of previously developed land but the Reasoned Justification clarifies it is important in meeting housing needs that all land in the housing land supply (including mixed and greenfield sites) is delivered.
- 4.26. Another amendment to the policy was made in relation to the wording that stated, *'all residential developments should be sustainably located, with public transport, local services and facilities accessible to the development by active travel.'* In order to quantify and clarify this requirement, the Publication Plan policy has been amended as below:

'The Council will support residential development proposals that are in sustainable and accessible locations and that promote and encourage use of public transport, walking, wheeling and cycling. All residential development should be accessible by active travel and achieve Greater Manchester Accessibility Level (GMAL)⁵⁹ 4 or above. In all cases, distances should be measured from the centre of the application site. This requirement should be met unless it can be demonstrated by the applicant that it is not appropriate, or the development provides exceptional benefits to the surrounding environment and community.'

- 4.27. The policy Reasoned Justification provides further information on GMAL and the accessibility levels.
- 4.28. The addition of the GMAL measure is to allow the policy to be accurately monitored and assessed to ensure that housing is being delivered sustainably and where possible minimises car use. PfE Policy JP-H4 includes the use GMAL to determine the minimum density requirements for new residential development (as is also reflected in Publication Plan Policy H2 which is discussed in this topic paper). The policy allows for individual site circumstances to be considered where appropriate thus allowing flexibility. Also, the Reasoned Justification makes clear that public transport accessibility will be regularly monitored and updated, as necessary, and other measures of transport accessibility may be used for this policy in the future, as and when they become available, which could replace GMAL.
- 4.29. A further minor amendment was made to add the word 'minimum' in reference to the borough's housing requirement, to ensure compliance with PfE Policy JP-H1 and to clarify that the housing requirement is a minimum and that additional homes can be delivered above this.

⁵⁹ Or any future measures of accessibility that become available and are relevant to assessing the accessibility of development.

- 4.30. With the amends made to Policy H1 it is considered that the policy provides a reasonable basis for supporting the delivery of sustainable housing land within Oldham.

Monitoring

- 4.31. Policy H1 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.
- 4.32. The Local Plan indicators that will be used to monitor this policy are:
- Plan period and housing targets; Net additional dwellings - in previous years; Net additional dwellings - for the reporting year; Net additional dwellings - in future years; and Managed delivery target; and
 - New and converted dwellings – on previously developed land.
- 4.33. Policy M1 of the Local Plan sets out that where monitoring identifies underperformance or unintended outcomes:
- Further guidance on the relevant policy matter may be produced through the preparation of Supplementary Planning Documents.
 - Policy revisions and an early review of the Local Plan may be triggered.
 - Engagement with stakeholders may be undertaken to address delivery barriers.
- 4.34. As this policy is informed by PfE (JP-H1) in relation to the housing requirement, the PfE monitoring framework will also help to monitor this chapter. As PfE is a Joint Plan of Bury, Bolton, Oldham, Manchester, Rochdale, Salford, Tameside, Trafford and Wigan, the PfE indicators apply plan-wide (including all districts). As such indicators where delivery figures are monitored represent the delivery across all districts, not just Oldham. The amount of homes Oldham is expected to deliver over the plan period is set out in Policy H1 and PfE Policy JP-H1.
- 4.35. The PfE monitoring indicators that will help to monitor this policy are as follows:
- Deliver approximately 9,063 homes annually by 2025
 - Deliver approximately 10,305 homes annually by 2030
 - Deliver approximately 10,719 homes annually by 2039
 - Percentage of residential development on brownfield land
- 4.36. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy H1.

Integrated Assessment

- 4.37. The policy scored mostly a mixture of positives and neutrals; however, it did score negative in terms of promoting quality and accessible open spaces (IA objective 2) as the policy promotes housing development on suitable sites, where the proposed development is consistent with other local plan policies, PfE policies and national planning policies, which could include some open space sites. However, mitigation is included within Policy CO1 of the Plan in terms of addressing and compensating

for the loss of open spaces to development (in line with Policy CO2). As such, no mitigation or enhancement to the policy was required.

- 4.38. The policy has been screened in by the HRA with possible impacts from direct land take; increases in diffuse air and water pollution and increases in recreational impacts. The HRA identifies mitigation measures to address any likely significant effects.

Policy H2: Density of New Housing

Summary of evidence

- 4.39. Ensuring brownfield land is used efficiently means that less land will be required for housing, thereby assisting the protection of our green spaces. It also ensures sustainability.
- 4.40. In the past the density of housing development has been variable, however the SHLAA indicates that over half of the anticipated future housing land supply is on sites with a density of over 50 dwellings per hectare. 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.
- 4.41. PfE Policy JP-H4 requires new residential development to achieve appropriate densities based on their location and accessibility.

Draft Local Plan Consultation and Duty to Co-operate

- 4.42. As part of the Draft Local Plan consultation, several responses were received to Policy H3 – which is now Policy H2.
- 4.43. The comments received, issues raised and the Council's response to these issues are summarised in Table 10 below. General support was also provided to the policy.

Table 10: Draft Local Plan Consultation Summary and Response – Housing Density

Comment/ Issue Summary	Council Response
The council must ensure appropriate flexibility is provided by this policy to allow developers to take account of the evidence in relation to site specific conditions, market aspirations, deliverability, viability and accessibility. The approach to density must also consider other policies in the plan, such as open space provision, SuDs, tree provision, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency and parking provision. These will impact on density.	The policy complies with PfE Policy JP-H4. Lower densities may be acceptable where appropriate and fully evidenced as set out in the policy, including: to meet a funding requirement or to deliver a particular housing need; to respond to specific site characteristics (i.e. flood risk, design context, heritage assets, green infrastructure); and to provide for specialist housing accommodation (i.e. extra care housing, bungalows). The Council will assess this on a site-by-site basis and only allow exceptions where necessary. It is considered that the policy provides sufficient flexibility in this regard to allow for the consideration of site-specific characteristics and requirements of other local plan policies.
Minor wording changes proposed in relation to green infrastructure/ ecology and repeating the	It is considered that Green Infrastructure, as defined by NPPF, includes ecology. Moreover, the site-specific circumstances listed in the policy are provided as examples and are not an exhaustive

Comment/ Issue Summary	Council Response
nationally described space standards as set out in PfE policy JP-H3.	<p>list. Sufficient flexibility is provided in the policy to consider ecology. In this regard, the amendment is not required.</p> <p>Reference to the nationally described space standards is now set out within Reasoned Justification of the housing mix policy (now numbered as H3), as a reminder of the requirements in PfE Policy JP-H3.</p>
<p>Identifying and facilitating high-density developments within the urban areas is part of the solution to addressing unmet and future housing needs. However, the council's approach will perpetuate fundamental flaws in the housing market if it is singularly reliant upon such an approach. Consider that viable, greenfield and edge-of-settlement sites form part of a sustainable solution to meeting the borough's needs and it will not always be appropriate to apply a blanket approach to housing densities.</p>	<p>The policy complies with PfE Policy JP-H4. Lower densities may be acceptable where appropriate and fully evidenced as set out in the policy, including: to meet a funding requirement or to deliver a particular housing need; to respond to specific site characteristics (i.e. flood risk, design context, heritage assets, green infrastructure); and to provide for specialist housing accommodation (i.e. extra care housing, bungalows).</p> <p>The Council will assess this on a site-by-site basis and only allow exceptions where necessary. It is considered that the policy provides sufficient flexibility to allow for alternative housing densities as appropriate, and therefore, does not propose a blanket approach.</p> <p>The approach to which sites may be considered suitable for housing is set out within Policy H1 – see also Table 8 for consultation issues and responses related to this policy.</p>
<p>It is essential that National Highways work closely with Oldham to understand the potential cumulative impacts of smaller sites in context with the larger strategic sites. This will be of particular importance when undertaking studies to determine appropriate mitigation measures required on the SRN.</p>	<p>Discussions will take place as necessary as part of Duty to Cooperate. In addition, as part of any relevant planning application, consultation will take place with highways colleagues, Transport for Greater Manchester and other relevant statutory bodies (including National Highways) where appropriate. A Statement of Common Ground also supports the Publication Plan.</p>
<p>The policy is supported due to it facilitating higher densities in appropriate locations; reducing the need to travel by car, ensuring sustainable travel; and ensuring development meets the nationally described space standards.</p>	<p>Support noted.</p>
<p>Minor wording change - 'designated and non-designated heritage assets' can be simplified to heritage assets (NPPF Glossary), which would cover both.</p>	<p>Amendment made as suggested.</p>

4.44. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.

4.45. There are no specific Duty to Co-operate issues associated with this policy.

Policy Approach

4.46. The policy reflects the housing density policy set out within PfE Policy JP-H4. The local interpretation and clarification of the minimum densities for residential development set out within PfE Policy JP-H4 was raised as a concern at Regulation 18 Issues and Options stage. As such, the policy addresses this by providing a local interpretation and clarification on how the policy should be applied within the borough's centres hierarchy and key transport hubs. It provides a local interpretation of the table within JP-H4 as follows:

Table 11 (Table H2 in the Local Plan): Minimum Densities for Residential Developments

Location (use highest density that applies when a site falls within more than one location)⁶⁰	Minimum net residential density (dwellings per hectare)	Minimum net residential density (dwellings per hectare)	Minimum net residential density (dwellings per hectare)
<i>Designated Centres</i>	<i>Within the location</i>	<i>Within 400m</i>	<i>Within 800m</i>
Oldham Town Centre	120	70	50
The Borough's other centres (Lees, Hill Stores (Huddersfield Road), Failsworth, Chadderton, Royton, Shaw and Uppermill)	70	50	35
<i>Public transport stops/hubs</i>	<i>Within the location</i>	<i>Within 400m</i>	<i>Within 800m</i>
Metrolink stops within Oldham Town Centre	N/a	120	70
Rail stations with a frequent service (Greenfield and Mills Hill Stations) and all other Metrolink stops	N/a	70	50
Areas within GMAL 6 ⁶¹ and above or its equivalent	50	35	35

⁶⁰ Where more than one density applies to the same part of the site, the highest density should be used. Different densities may apply to different parts of the site. Distances should be measured from the boundary of the designated centre or GMAL area. All distances are measured in a straight line.

⁶¹ GMAL is an abbreviation of Greater Manchester Accessibility Level, which measures the accessibility of locations across Greater Manchester by walking and public transport. Areas are scored on a scale of 1-8, with 8 being the most accessible. GMAL scores are published online at data.gov.uk and are available on [MappingGM](https://mappinggm.com).

- 4.47. The policy also provides clarification and examples of circumstances where lower densities may be appropriate, in line with the criteria set out in JP-H4, as follows: *'In some circumstances exceptions to the minimum densities may apply, such as:*
- to meet a funding requirement or to deliver a particular housing need⁶²*
 - to respond to specific site characteristics (i.e. flood risk, design context, heritage assets, green infrastructure); and*
 - to provide for specialist housing accommodation (i.e. extra care housing, bungalows).'*
- 4.48. It states that the Council will assess this on a site-by-site basis and only allow exceptions where necessary.
- 4.49. To help assess and monitor the density of proposed residential developments the policy requires that planning applications should provide the gross and net developable area of the proposed housing development in hectares.
- 4.50. The policy has had minimal changes since Draft Plan Stage, except for simplifying the requirements for planning applications to submit detail to assist in the monitoring of housing density. This has been done for clarity and conciseness.

Monitoring

- 4.51. Policy H2 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.
- 4.52. The Local Plan indicator that will be used to monitor this policy is:
- Number of planning applications approved achieving the minimum density requirements as appropriate
- 4.53. Policy M1 of the Local Plan sets out that where monitoring identifies underperformance or unintended outcomes:
- Further guidance on the relevant policy matter may be produced through the preparation of Supplementary Planning Documents.
 - Policy revisions and an early review of the Local Plan may be triggered.
 - Engagement with stakeholders may be undertaken to address delivery barriers.
- 4.54. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy H2.

Integrated Assessment

- 4.55. The policy scored a mixture of significantly positive, positive and neutral. No negative scores were given and no mitigation or enhancement to the policy was required as a result of the IA.
- 4.56. The HRA has screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this policy.

⁶² As informed by local evidence, such as the LHNA (2024), or subsequent updates.

Policy H3: Housing Mix

Summary of evidence

- 4.57. It is important to ensure the delivery of a mix of housing suitable to meet a range of the borough's housing needs and which provides housing choice and diversity.
- 4.58. The LHNA (2024) has found that there are imbalances in the size, mix and type of new homes required across the borough to meet local housing needs.
- 4.59. There is an outward migration of young people in the borough, so there is a need to ensure there is an attractive housing offer available in the borough to retain and attract young people.
- 4.60. 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.
- 4.61. Based on evidence, the LHNA (2024) has provided recommendations for overall housing type and mix to meet local housing needs as set out in Table 5 above.
- 4.62. Table 6 shows that for market sale dwellings and affordable home ownership tenures, the majority (70-75% / 65-70%) of homes should be houses and provide a mix of sizes (number of bedrooms). For affordable/ social rented dwellings there should be broad a mix of house types (house, flat and bungalow and/or level access), but with a focus on smaller dwellings of 1-2 bedrooms.
- 4.63. The LHNA has identified a need for level-access homes and bungalows to meet the needs of older people and disabled people. The LHNA has identified that approximately 25-30% of the overall housing mix should be for level-access homes or bungalows, to meet local housing needs. There is a greater need for bungalows and/or level access homes of affordable/ social rented tenures, compared to market homes and affordable home ownership.
- 4.64. Table 5.2 in the LHNA provides a further breakdown of the recommended housing mix for each tenure by district, including for Oldham Town Centre.
- 4.65. There is also 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. However, it is a challenge to permission enough suitable plots to meet the number of individuals on Oldham's register.

Draft Local Plan Consultation and Duty to Co-operate

- 4.66. As part of the Draft Local Plan consultation, several responses were received to Policy H2 - which is now Policy H3.
- 4.67. The comments received, issues raised and the Council's response to these issues are summarised in Table 12 below.

Table 12: Draft Local Plan Consultation Summary and Response – Housing Mix

Comment/ Issue Summary	Council Response
<p>The need for a mix of house types and sizes is supported, it is important to consider a range and choice of homes to meet local needs. Whilst the policy recognises that there may be some circumstances when an alternative mix may be appropriate, this approach must be flexible. The policy does not acknowledge market location and the need to ensure viability of schemes. It is important to acknowledge that needs and demand will vary from area to area and site to site and an appropriate mix should be provided for the location and market.</p>	<p>The policy supports a flexible approach to housing mix noting that mix should be guided by available evidence, such as the LHNA or any subsequent updates. It provides mix recommendations for all tenures (in the Reasoned Justification) but sets out that alternative housing mix's may be appropriate in some circumstances (where evidenced) including where: alternative mix is required in relation to specific funding requirements and the proposed development is still able to contribute to meeting local housing needs; the site has distinct characteristics that make an identified housing mix inappropriate or impracticable; the development is for specialist accommodation or there is a demonstrable need for different types of homes that cannot be delivered at a particular density; and/ or there is a need to vary existing housing mix in the locality. The circumstances listed in the policy (as above) are not exhaustive and alternative housing mixes can be agreed where necessary and evidenced.</p>
<p>A policy which establishes a borough-wide housing mix may not meet the specific requirements of a town centre housing development, particularly as the density policy recognises that housing developments within the town centre will predominantly be for apartments. A greater proportion of apartments will be required in the town centre in order to meet demand as well as the housing density requirements. A bespoke town centre specific housing mix policy be created, informed by appropriate evidence, that allows a greater degree of flexibility to be embedded.</p>	<p>The policy supports a flexible approach to housing mix noting that mix should be guided by available evidence, such as the LHNA or any subsequent updates. It provides mix recommendations for all tenures (in the Reasoned Justification) but sets out that alternative housing mix's may be appropriate in some circumstances, where evidenced. The policy Reasoned Justification points to Table 5.2 in the LHNA which provides a further breakdown of the recommended housing mix for each tenure by district, including for Oldham Town Centre. The Reasoned Justification also notes that in line with Policy H2 (density), the majority of housing within Oldham Town Centre will be for apartments, ensuring an appropriate density is achieved. However, the LHNA has also identified a need for houses, including larger homes of 3 and 4 beds and that future developments should consider the existing housing mix and aim to provide a diverse mix of house types across the town centre. It is considered that the policy provides enough flexibility in this regard.</p>
<p>Encourage the removal of Table H2 from the draft policy, where the LHNA on which it is based is currently being</p>	<p>Since the Draft Plan policy, the policy has been reworded to make clear that the housing mix is a recommendation based on available evidence. It clarifies</p>

Comment/ Issue Summary	Council Response
<p>updated, this update could be replaced during the lifespan of the Local Plan, making this policy appear out-of-date. Welcome the council's acknowledgement that "an alternative mix may be appropriate" for some developments. Departures may also be justified to compensate for the skewed nature of the housing land supply, with certain sites seemingly able to provide only smaller apartments such that larger sites should provide a greater number of larger houses, to achieve a balance at the borough level. This should be specifically recognised in the policy as a circumstance in which an alternative mix may be appropriate.</p> <p>This policy should accord with PfE JP-H4, which was updated through Main Modifications recommended by the Planning Inspectors. There should not be a specific requirement for apartments; rather they should be an option which could be provided where appropriate.</p>	<p>that, where necessary, housing mix will be updated over the lifetime of the Local Plan in line with updated local evidence. The recommended housing mix table is now set out in the Reasoned Justification and is based on the updated LHNA (2024).</p> <p>The policy supports a flexible approach to housing mix. It sets out that alternative housing mix's may be appropriate in some circumstances (where evidenced) including to meet local housing needs and where there is a need to vary existing housing mix in the locality. The circumstances listed in the policy are not exhaustive and alternative housing mix's, can be agreed where necessary and evidenced. As such no further changes are considered necessary. The policy is in line with PfE Policy JP-H4.</p>
<p>Specific provision should be made for specialist residential uses in appropriate locations. Examples can be former armed forces veterans.</p>	<p>The policy sets out general recommendations for housing mix (type, tenure (also see Policy H5) and size) based on local evidence. However, the policy supports a flexible approach to housing mix. It sets out that alternative housing mix's may be appropriate in some circumstances (where evidenced) including where the development is for specialist accommodation. The circumstances listed in the policy (as above) are not exhaustive and alternative housing mix can be agreed where necessary and evidenced.</p> <p>The Local Plan does not include site allocations. However, in line with policy H1, it does support the delivery of a diverse housing offer. Policy H4 further supports provision for specialist housing needs.</p>
<p>A strategy based on sustaining high rates of international migration is not a sustainable response and is subject to factors beyond the council's control. The council should analyse migratory patterns and identify long-term solutions and this is likely to involve building aspirational and family-</p>	<p>The policy sets out the housing mix for new residential development. Comment relates to Policy H1 in terms of housing requirement/ distribution. See responses to Policy H1 in terms of housing land supply distribution.</p>

Comment/ Issue Summary	Council Response
<p>sized housing in the right locations of the borough. Consider that the release of edge-of-settlement greenfield sites is necessary in order to provide the opportunity for aspirational housing and address a contracting working age population and how the borough can attract and retain families and an economically active population. This would help the council to deliver the family-sized housing set out through Draft Policy H2.</p>	

- 4.68. The responses received can be found in the Schedule of Comments and the Council's Response document.
- 4.69. There are no specific Duty to Co-operate issues associated with this policy.

Policy Approach

- 4.70. Policy H3 aims to support the delivery of a diverse housing mix. It provides housing mix recommendations for market and affordable housing, based on local housing needs, in line with the evidence set out in the Local Housing Needs Assessment (LHNA). As local needs may change over the lifetime of the Local Plan, the policy clarifies in the footnotes that the housing mix, whilst based on the evidence in the LHNA 2024, may be updated in the future in line with local evidence, including subsequent updates to the LHNA (or other relevant evidence documents).
- 4.71. The Draft Plan policy set out the housing mix requirements within the policy, based on the LHNA (2019)⁶³. Comments were received as part of the Draft Plan consultation (as set out in Table 12 above), that the policy needed to be more flexible and should acknowledge that housing mix can change. As set out above, the policy now clarifies that housing mix should be provided based on up-to-date local evidence (including subsequent updates to the LHNA or other relevant evidence). The policy wording has also been amended, and the housing mix table has been moved to the Reasoned Justification (and updated). When referencing housing mix the policy now refers to the 'recommended' housing mix – Table H3 of the policy, and points to the LHNA (Table 5.2) for further detailed housing mix evidence (including recommendations for housing mix by district, and for Oldham Town Centre). Table H3 identifies the overall borough-wide housing mix recommendations for market and affordable homes.
- 4.72. It is recognised that whilst it is important that housing mix meets local housing needs, it also needs to be flexible to account for circumstances where mix might need to differ to the borough-wide recommendations. To deal with this, the policy sets out circumstances where an alternative housing mix to what is set out in Table H3 may be appropriate, including in the circumstances listed below:
- 1) 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;
 - 2) It can be clearly demonstrated that the site has distinct characteristics that make an identified housing mix inappropriate or impracticable, such as flood risk, design context, impact on heritage assets;
 - 3) 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
 - 4) 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.

⁶³ As the updated LHNA (2024) was being prepared at the time of publication.

- 4.73. This list is not exhaustive, and the policy clarifies that alternative housing mix for development should be agreed with the Council at the earliest opportunity, ideally through seeking pre-application advice.
- 4.74. The Reasoned Justification notes that housing mix may differ in Oldham Town Centre. The mix will mainly be for, and should be considered in line with, the density requirements set out in Policy H2 (and PfE Policy JP-H4). Whilst other areas will need to consider housing density in line with Policy H2 too, Oldham Town Centre will be most effected as it has the higher density requirement of a minimum of 120 dwellings per hectare, due to its accessibility. However, as set out in this policy and Policy H2, exceptions to providing the recommended housing mix and achieving the minimum housing density are available where appropriate and evidenced in line with the policies.
- 4.75. The policy also sets out that bungalows and level-access homes will come forward as part of the overall housing mix. In particular, level-access homes will likely come forward within town centres and highly sustainable locations, in line with Policy H2, where higher densities required in highly accessible locations tend to be delivered in the form of apartments. This will help to meet the need for level-access housing as identified in the LHNA.
- 4.76. The requirement set out in the Draft Plan policy for conditions to be attached to any new provision of bungalows to remove permitted development rights, ensuring the level-access design is maintained, has been removed. On reflection, it was considered that this requirement conflicted with NPPF and permitted development rights. As set out above, the policy continues to encourage the provision of bungalows and level-access homes as part of the overall housing mix (as recommended in Table H3 in the policy).
- 4.77. The policy also sets out that delivery of housing for Self-Build and Custom Housebuilding will be supported - this has been added because since the Draft Plan stage, the Self-Build and Custom Housebuilding policy (H11 in the Draft Plan) has been removed. Several comments were received that the Policy H11 would be ineffective unless specific sites were identified for this type of provision. As the Local Plan no longer includes site allocations, it was considered that this policy, along with other Local Plan policies and NPPF/ PPG provide sufficient guidance to deal with applications for Self-Build and Custom Housebuilding in Oldham.
- 4.78. Further minor amendments have been made to policy wording since the Draft Plan stage.
- 4.79. The policy should be read alongside PfE Policy JP-H3, which sets out 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.' JP-H3 also requires 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.'

Monitoring

- 4.80. Policy H3 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.
- 4.81. The Local Plan indicator that will be used to monitor this policy is:
- Total housing completions by size and type on major sites
- 4.82. Policy M1 of the Local Plan sets out that where monitoring identifies underperformance or unintended outcomes:
- Further guidance on the relevant policy matter may be produced through the preparation of Supplementary Planning Documents.
 - Policy revisions and an early review of the Local Plan may be triggered.
 - Engagement with stakeholders may be undertaken to address delivery barriers.
- 4.83. Housing mix related policy requirements for new housing set out in PfE Policy JP-H3 - 'adaptable and accessible' standard in Part M4(2) and Nationally Described Space Standards - will be monitored through the following indicators in the PfE monitoring framework:
- Percentage of new homes meeting Nationally Described Space Standard (NDSS)
 - Percentage of new homes meeting Accessible & Adaptable (A&A) standard
- 4.84. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy H3.

Integrated Assessment

- 4.85. The policy scored a mixture of positives and neutrals. No negative scores were given and no mitigation or enhancement to the policy was required as a result of the IA.
- 4.86. The HRA has screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this policy.

Policy H4: Providing for Local Housing Needs

Summary of evidence

- 4.87. Oldham has an ageing population - there are approximately 39,000 people aged 65 and over living in Oldham currently, which is expected to increase by 26.62% to over 49,500 people by 2040. Also, the number of people in Oldham over the age of 85 is projected to increase by 43% by 2040.
- 4.88. Between 2023 and 2040 there is an expected increase of 38.4% in people over 65 with dementia.
- 4.89. As a result, there will be an increase in the number of people needing care and the care needed will become increasingly complex. The LHNA has identified a need for additional specialist older persons dwellings, Extra Care units and residential care

bedspaces. There is also a need to build more adapted, or adaptable, accommodation so that people can be supported at home for as long as possible.

- 4.90. There is also expected to be an increase in the number of households experiencing a disability in Oldham over the plan period, and as such there is a need for more wheelchair accessible homes and appropriate housing for those with other physical disabilities, dementia, a learning disability and mental health disorders. The LHNA has identified a need for 5% of new dwellings to be built to the M4(3) wheelchair accessible standard (an average target of around 34 per year over the plan period).
- 4.91. 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.
- 4.92. Caring for Looked After Children is a key part of the Council's role. As of 2023 there were 597 Looked After Children in Oldham with the rate being higher than the national average (but lower than the North-West average). 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.
- 4.93. As of 2023, there were 294 Care Leavers in Oldham. Whilst 92% were in suitable accommodation (in 2022/23), ensuring the delivery of appropriate housing options for support Care Leavers is important to support the numbers of young people moving from the care system into independence. For some, this housing might be supported group living accommodation, homes in multiple occupation (with or without a care element), or an affordable flat or house.
- 4.94. In addition, there is also a need to ensure appropriate housing to accommodate increasing numbers of young adults (often transitioning from children's care services) with an autism diagnosis (or those awaiting an assessment/ outcome).

Draft Local Plan Consultation and Duty to Co-operate

- 4.95. At Draft Plan Stage this policy was split into the following individual policies:
- H4 Homes for Older People
 - H5 Homes for Disabled People
 - H6 Homes for Children and Care Leavers
- 4.96. The three policies above have now been combined as 'Policy H4 Providing for Local Housing Needs'.
- 4.97. As part of the Draft Local Plan consultation, several responses were received to Policy H4 Homes for Older People, Policy H5 Homes for Disabled People and Policy H6 Homes for Children and Care Leavers, which are relevant to this policy (H4).
- 4.98. The comments received, issues raised and the Council's response to these issues are summarised in Table 13 below. At Draft Plan stage, policies H4 and H5 were very similar, and the types of housing provision required by these policies could be applicable to both (in some circumstances). As such many of the comments

received to H4 and H5 were similar or addressed both policies, therefore the issues raised have been combined in the table below where applicable. General support was also provided to policies H4 and H5.

- 4.99. Very few comments were received in relation to Policy H6 – in addition to the response noted in the table below, three responses simply noted support for the policy and one response noted an objection to the policy.

Table 13: Draft Local Plan Consultation Summary and Response – Specialist Housing Needs (incl. Homes for Older People, Disabled People and Children and Care Leavers)

Draft Plan Policy	Comment/ Issue Summary	Council Response
<p>H4 Homes for Older People</p> <p>H5 Homes for Disabled People</p>	<p>Supportive of providing homes that are suitable to meet the needs of older people in general, the justification for this policy is unclear. Question the threshold of 150 homes – it may not be deliverable or applicable to all parts of the borough. In some parts of the borough there will be no developments of 150+ homes. Moreover, delivering this type of provision may not be suitable as part of all developments which meet the threshold.</p>	<p>The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older persons and disabled persons housing has been removed. The policy continues to support the delivery of housing for older people and disabled people (including housing options which are adaptable and accessible standard (M4(2)), and other types of specialist housing provision).</p>
<p>H4 Homes for Older People</p> <p>H5 Homes for Disabled People</p>	<p>There is concern that the policy is not viable/ has viability has not been fully considered.</p> <p>It is noted that the policy is dependent on the delivery of larger developments to meet the needs of the aging / disabled population. However, the housing land supply for Oldham is dominated by smaller brownfield sites within the urban area where viability is a key constraint. Therefore, until such time as more suitable, larger sites are identified for the delivery of housing in the borough this policy will not be effective in delivering the homes required for older people.</p>	<p>The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older persons and disabled persons housing has been removed. The policy continues to support the delivery of housing for older people and disabled people (including housing options which are adaptable and accessible standard (M4(2)), and other types of specialist housing provision).</p> <p>It is considered that the policy is effective to support the delivery of housing for older people and disabled people. In addition, the requirements set out in PfE Policy JP-H3 and Local Plan policy H3 (housing mix) will support the delivery of accessible and adaptable housing and level-access housing which could be suitable for older people and disabled people.</p>
<p>H4 Homes for Older People</p>	<p>Question the need for these homes over and above the provision made by M4(2) standards.</p>	<p>The evidence base has identified that there is need for specialist accommodation for older people - the policy Reasoned Justification, and this topic paper sets this evidence out. The policy now provides a supporting role in ensuring the delivery of housing for older people and sets out</p>

Draft Plan Policy	Comment/ Issue Summary	Council Response
		requirements to ensure this provision is appropriate (i.e. it is accessible, affordable and suitable designed).
H4 Homes for Older People H5 Homes for Disabled People	The council should not rely only on strategic sites to meet the need for specialist accommodation to the exclusion of standalone allocations for this type of development and in particular retirement accommodation. A more proactive and effective approach should be taken to identify and allocate specific sites for this purpose in consultation with providers of this type of development.	<p>The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older people/ disabled people housing has been removed. The policy continues to support the delivery of housing for older people and disabled people (including housing options which are adaptable and accessible standard (M4(2)), and other types of specialist housing provision).</p> <p>Site allocations are not included within this Local Plan. However, the policy would support specific sites coming forward for provision for older people and disabled people.</p>
H4 Homes for Older People	If the council wishes to adopt the higher optional standards for wheelchair user homes (M4(3)) the council should only do so by applying the criteria set out in the PPG. If the council can provide the appropriate evidence and this policy is to be included, then recommend that an appropriate transition period is included within the policy.	The policy does not include the requirement for homes to be built to M4(3) standard (wheelchair accessible). However, the policy would support the delivery of this type of housing, in line with the need for this provision identified in the evidence base.
H4 Homes for Older People H5 Homes for Disabled People	The policy requires a provision of homes for older people / disabled people 'where there is a demonstrated local need at the time of application'. It is unclear whether this need is required to be demonstrated through subsequent planning applications or if this will be demonstrated by the council's own evidence base. The policy should be updated to clarify this and remove any ambiguity. It will also be necessary for the council to ensure the evidence base prepared to support this policy is kept up to date throughout the plan period.	<p>The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older people/ disabled people 'where there is a demonstrated local need at the time of the application' has been removed. The policy also encourages early discussions with the Council through pre-application advice to discuss local housing needs.</p> <p>In any case, the policy is informed by several evidence base documents including, the Local Housing Needs Assessment and the Joint Strategic Needs Assessment, which are</p>

Draft Plan Policy	Comment/ Issue Summary	Council Response
		considered up to date at the time of publication. The evidence base for this policy will be kept up to date as appropriate over the lifetime of the plan.
H4 Homes for Older People H5 Homes for Disabled People	Policy H5 Homes for Disabled People also has the same requirement for Policy H4, with Policy H5 appearing to be confusing specialised housing for older people and homes for disabled people and results in the policy being ambiguous contrary to paragraph 16 (d) of NPPF. Suggest an amended policy text combining H4 and H5 to simplify the plan.	The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older people and disabled people has been removed. The housing need policies have now been combined into Policy H4 'Providing for Local Housing Needs'.
H4 Homes for Older People H5 Homes for Disabled People	It is suggested that the requirements for accessible homes presented in PfE Policy JP-H3 and emerging Oldham Local Plan Policy H2 could provide sufficient flexibility and adaptability to allow older people / disabled people to live within wider developments in sustainable locations without the need for a specific provision to be delivered on site.	This is noted and the policy reference the requirements in PfE Policy JP-H3. Moreover, it is recognised that Policy H3 (housing mix) (was Policy H2 in the Draft Plan) will support the delivery of accessible and adaptable housing and level-access housing which could be suitable for older people and disabled people. The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older people/ disabled people have been removed, however it is considered that the policy is still necessary to provide a supporting role and to ensure provision is appropriate (i.e. it is accessible, affordable and suitable designed).
H5 Homes for Disabled People	Policy appears to recognise that H4 and H5 overlap and suggests that suitable homes for disabled people could also include supported housing and accessible and adaptable homes. Whilst it states that the requirement may be combined it is perhaps not entirely clear how it would be demonstrated that the resultant housing mix is appropriate for both groups. For example, if it is age restricted homes that are	The policy requirement set out in the Draft Plan policies (H4 and H5) which required developments of 150 dwellings and above to include units for older persons/ disabled persons housing has been removed. The policy continues to support the delivery of housing for older people and disabled people (including housing options which are adaptable and accessible standard (M4(2)), and other types of specialist housing provision). The policy also encourages early

Draft Plan Policy	Comment/ Issue Summary	Council Response
	wheelchair accessible are they considered to cater for both groups or not? Recommend that the council reviews this policy and works with providers of supported housing and disabled people in the community to ensure that the policy is the most appropriate way to deal with any evidenced need.	discussions with the Council through pre-application advice to discuss local housing needs.
H6 Homes for Children and Care Leavers	Support the policy, suggests the homes need to be more affordable.	The policy supports the delivery of housing for children and care leavers where the proposed development is compliant with other policies in PfE and the Local Plan – this would include affordable housing Policy H5 (which is applicable to major development). The policy wording also notes that this housing should be appropriate for the occupiers needs, which should take affordability into consideration.

4.100. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.

4.101. There are no specific Duty to Co-operate issues associated with this policy.

Policy Approach

4.102. As set out above, at Draft Plan stage policy for housing for older people, disabled people and children and care leavers was set out in three separate policies (Draft Plan policies H4, H5 and H6). Several comments to the Draft Plan consultation noted that the policies for housing for older people and disabled people could be combined for clarity and to avoid ambiguity and confusion around the policy requirements.

4.103. Both policies H4 and H5 had similar requirements for 'Developments of 150 homes and above are required to provide a minimum of 30 homes and a further 20 homes for each additional 200 homes thereafter for housing provision which is suitable for *older people / disabled people [as relevant to each policy]*, where there is a demonstrated local need at the time of application.'. As set out in Table 12, several comments were received which noted that although the policy recognised there would be some overlap in provision which could be suitable for both housing for older people and disabled people (given the nature of the needs), the requirement was particularly unclear on how overlap would be considered.

4.104. Moreover, comments were received which argued that the policy requirements to provide specialist units as part of larger development, in both policies H4 and H5 were undeliverable and unviable. On reflection, it is considered that the policy requirement would not deliver the type or numbers of provision required to meet local needs for older people and disabled people effectively, and as such it has been removed. In many cases specialist provision is provided on stand-alone sites, which the policy supports. Also, the requirements set out in PfE Policy JP-H3 and Local Plan Policy H3 (housing mix) will support the delivery of accessible and adaptable housing and level-access housing which could be suitable for older people and disabled people. These requirements are also referred to within the policy, as set out below.

4.105. The combined policy now sets out that the Council will seek to secure a range of housing options for older people and disabled people, by:

- a. Requiring all new homes to be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations⁶⁴;
- b. Supporting physical home adaptations and improvements to existing specialist accommodation, where there are no unacceptable impacts on the amenity of neighbouring properties;
- c. Supporting the development of new specialist accommodation and supported housing, including:
 - i. Age-restricted general market housing;

⁶⁴ In accordance with PfE policy JP-H3.

- ii. Extra Care Housing;
- iii. Sheltered Housing/ Assisted Living; and
- iv. Nursing and Care Homes.

4.106. In line with Policy H1, the policy also requires that specialist housing provision has easy access to community facilities, local services and public transport, and be well integrated within the wider neighbourhood. This is especially important for provision for older people and disabled people to ensure they have access to services and facilities and do not become isolated.

4.107. The policy sets out principles to ensure the appropriate design, amenity and accessibility of housing provision for older people and disabled people, such as:

- a) Promote ease of movement on foot and with mobility aids;
- b) 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;
- c) Feature parking spaces and setting down points in proximity to entrances; and
- d) 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.

4.108. The policy also requires that specialist housing provision of 10 homes and above are expected to provide affordable housing, in line with Local Plan Policy H5. This is to ensure that major developments of market sales housing for older people and disabled people includes the relevant proportion of affordable housing to meet local housing needs. As set out in this topic paper, evidence has identified a need for affordable housing across all types and tenures.

4.109. As set out above, Draft Plan Policy H6 Homes for Children and Care Leavers has now been combined into this policy. It was considered appropriate to create a combined housing needs policy to support the delivery of specialist housing provision, including housing provision for children and care leavers and older and disabled people.

4.110. Draft Plan Policy H6 set out that: “in deciding applications for new children’s homes and semi-independent supported-living facilities, the Council will seek to ensure that new provision:

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

4.111. The policy set out that ‘with regards to criterion 2) 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. The Council will make a decision on a case-by-case basis and considering the factors listed above.'.

4.112. It was considered that, on reflection, the policy may be difficult to accurately monitor and there was no available evidence that a proliferation of children's homes was occurring or causing problems. The policy now requires that the delivery of housing for children and care leavers, is compliant with other policies in PfE and the Local Plan, and:

- Is in a sustainable and accessible location, with easy access to education facilities, public transport and open space, sport and recreation;
- Provides appropriate accommodation for the number of proposed occupiers and their needs; and
- Gives priority to children and young people from Oldham in the first instance, in line with local need.

4.113. The policy is considered sufficient to guide applications for housing for children and care leavers to ensure provision is appropriate, good quality and meets local housing needs. Other policies in the plan, such as those related to amenity, will ensure that any issues of potential over-concentration of uses and amenity are considered when assessing development proposals.

Monitoring

4.114. Policy H4 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.

4.115. The Local Plan indicator that will be used to monitor this policy is:

- Total number of planning applications approved for specialist housing provision

4.116. Policy M1 of the Local Plan sets out that where monitoring identifies underperformance or unintended outcomes:

- Further guidance on the relevant policy matter may be produced through the preparation of Supplementary Planning Documents.
- Policy revisions and an early review of the Local Plan may be triggered.
- Engagement with stakeholders may be undertaken to address delivery barriers.

4.117. Housing mix related policy requirements for new housing set out in PfE Policy JP-H3 including the 'adaptable and accessible' standard in Part M4(2) will be monitored through the following indicator in the PfE monitoring framework:

- Percentage of new homes meeting Accessible & Adaptable (A&A) standard

4.118. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy H4.

Integrated Assessment

- 4.119. The policy scores a mixture of positives and neutrals. No negative scores were given and no mitigation or enhancement to the policy was required as a result of the IA.
- 4.120. The HRA has screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this policy.

Policy H5: Affordable Housing

Summary of evidence

- 4.121. The LHNA has identified a net shortfall of affordable housing of 669 homes each year (over a 10-year period). This is a marked increase on the 203 homes each year as reported in the 2018 LHNA and reflects the overall increase in affordable housing need and the increasing cost of the private rented sector. Whilst the planning process is only expected to deliver a portion of this need, it reflects the challenge of meeting local housing needs for affordable housing.
- 4.122. The LHNA (2024) has also found that there are disparities in the affordability of housing in parts of the borough, with some areas distinctly lacking adequate affordable housing provision to meet local needs. There are also deficiencies in smaller accommodation in the form of 2 and 3 bed houses. However, this is indicative of a lack of choice in the market and respondents' expectations, as Oldham's Local Housing Register indicates a need for larger family housing in certain areas of the borough also.
- 4.123. There are issues with attracting and retaining young professionals and families. In some parts of the borough, there are not enough affordable homes for people to live in the area in which they grew up, leading to an out-migration of these households to neighbouring boroughs. There is also a lack of smaller single person affordable housing and affordable housing for older people and disabled people. Suitable affordable housing should also be provided for key workers.
- 4.124. The LHNA recommends an overall housing tenure split of 80% market housing and 20% affordable housing.
- 4.125. Further analysis identifies a detailed tenure mix for affordable housing provision of approximately 43% social rented, 25% affordable rented and 33% affordable home ownership.
- 4.126. Viability is a key consideration for affordable housing policy. The Oldham Local Plan Viability Assessment (2025) identifies viability challenges facing the borough which are mainly due to the high build costs and lower sales values across Oldham.
- 4.127. Based on the results of the viability sensitivity testing, the assessment makes recommendations for affordable housing policy requirements for each type of site (brownfield, greenfield and Green Belt) and within each value area (low, medium and high), considering what is likely to be viable in these areas, and recognising the need for affordable housing.
- 4.128. For brownfield sites in the lower and medium value areas, the assessment notes that the Council may wish to include an affordable housing requirement, given that these areas tend to have higher affordable housing need, but that this should be

modest to account for the difficult viability. Higher value areas are more viable and could likely support a higher requirement than the lower value areas for brownfield sites. The assessment stated that high value zones should be able to afford a 20% affordable housing requirement (including s106 policy costs).

- 4.129. For greenfield typologies, viability also remains challenging in most of the value zones, however a requirement is still recommended for low and medium value areas, as some schemes can afford up to 5% affordable housing (not including s106 policy costs). Within the higher value zones, schemes can afford more than 20% affordable housing in most cases.
- 4.130. For Green Belt, the assessment notes that whilst the 50% requirement is not generally viable, in line with NPPF, a target could be set which is lower than 50% but higher than non-Green Belt land requirements, to support viability.
- 4.131. The findings and recommendations of the assessment have been considered in terms of the policy requirements set out in the plan; the policy approach is considered in further detail below.

Draft Local Plan Consultation and Duty to Co-operate

- 4.132. As part of the Draft Local Plan consultation, several responses were received to Policy H7 (now Policy H5).
- 4.133. The comments received, issues raised and the Council's response to these issues are summarised in Table 14 below.

Table 14: Draft Local Plan Consultation Summary and Response – Affordable Housing

Comment/ Issue Summary	Council Response
<p>Suggest the council consider the need for affordable housing for NHS staff and those employed by other health and care providers. Housing affordability and availability can play a significant role in determining people's choices about where they work. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. Recommend engaging with local NHS, ensuring that the local need for affordable housing for NHS staff is factored into housing need and consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.</p>	<p>The LHNA has considered the needs of key workers, including NHS staff. It sets out that affordable housing is required for this group and has noted that this should include affordable rented options, given issues of affordability in the private rented sector. The tenure mix requirements in the policy take this into account.</p> <p>The Local Plan no longer includes site allocations. However, key worker housing is supported by the Local Plan (see also Policy H1).</p>
<p>Support the policy, rents need to be more affordable, rents are quite high in Oldham so people can't afford private rent so end up having to bid on social housing often waiting four years plus.</p>	<p>Support noted. The policy includes requirements to provide affordable housing as part of development, including affordable rented properties.</p>
<p>The NPPF is clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. As the Council has not provided a Viability Assessment it is not possible to comment on the soundness or suitability of this policy.</p>	<p>A Local Plan Viability Assessment has now been prepared and is available as part of the plan evidence base. The policy has been amended informed by evidence set out within the assessment and other relevant evidence on affordable housing need. It is considered that the policy presents a balanced approach to ensure affordable housing, which is much needed in the borough to meet local housing needs can be provided but also accounting for viability issues which are present in some areas of the borough. Further consideration of the policy approach is provided in this topic paper.</p>

Comment/ Issue Summary	Council Response
<p>Believe affordable housing requirement should be boroughwide. In relation to Table H5, the size and type of affordable housing should be left flexible and regard should be had to local housing needs at the point of early discussion with developers on individual proposals. At the time a development is brought forward the council should advise on their preferred affordable housing mix based evidence of local needs at that time. Recommend that the council amend draft Policy H7 to remove Table H4 and Table H5 to allow for an appropriate affordable housing tenure to be developed between the council and developer on a case-by-case basis, in accordance with the identified needs at the time of the application.</p>	<p>Given the viability and housing needs variability across the borough it is considered that a variable housing mix is most appropriate. This allows for higher levels of affordable housing to be provided where viability allows but also aims to rebalance levels of affordable housing in the borough, ensuring affordable housing is more evenly spread. The affordable housing requirements have been informed by up-to-date evidence (including the LHNA and the Viability Assessment), however policy requirements will be kept under review and updated if necessary in line with updated evidence, over the plan period.</p> <p>The policy allows for alternative tenure or housing mix where the applicant can adequately evidence the need for it, considering local affordable housing needs. Any proposed alternatives will be agreed with the Council at planning application stage.</p>
<p>Support the commitment to delivering affordable housing alongside other tenures to ensure balanced and mixed communities. Also welcome the council's acknowledgement that in certain circumstances, such as to fulfil a funding requirement or meet an identified local need, an alternative tenure split or mix may be acceptable.</p>	<p>Support noted. The policy allows for alternative tenure or housing mix where the applicant can adequately evidence the need for it, considering local affordable housing needs. Any proposed alternatives will be agreed with the Council at planning application stage.</p>
<p>The evidenced shortfall in affordable housing delivery must be addressed as part of the emerging LPR. The allocation of additional sites which can viably deliver affordable housing is required to ensure there is a sufficient and suitable supply of affordable housing of the type and size required in the right areas.</p>	<p>The Local Plan no longer includes site allocations. However, the policy requires affordable housing is delivered as part of major residential developments. It is considered that the policy is sufficient to help deliver affordable housing to meet local housing needs in the borough.</p>
<p>Welcome that in the exceptional circumstances there is reference to the conversion of vacant buildings including mills, but to be in line with Policy H8 it should include reference to conversion <u>or demolition</u> of vacant buildings, such as mills.</p>	<p>Draft Plan Policy H8 Vacant Building Credit has been removed and policy around Vacant Building Credit has been added to this policy (H5). The policy now also refers to 'demolition' as suggested, in line with planning guidance.</p>

Comment/ Issue Summary	Council Response
Support the policy but would like a definition of the term "affordable".	The policy sets out that affordable housing is defined as per NPPF Annex 2 Glossary. A summary of this definition is provided in the policy Reasoned Justification.
The grouping of wards into zones for affordable housing needs to be more appropriately assessed. Some areas of Royton, Shaw and Chadderton for example are more affluent than some areas of Saddleworth. Council currently awaits the conclusion of the Combined Authorities Task and Finish Group on affordable housing in the city region. Opportunities should be sought to redefine 'affordable' in the context of housing policymaking.	The Local Plan Viability Assessment (2025) updates the value areas identified for Oldham (to that of those set out at Draft Plan stage, based on the PfE Viability Assessment) based on evidence including market research, new build and second-hand achieved values, and deprivation. It is acknowledged that it is not perfect and there may be particularly high value schemes in a lower value area and vice-versa depending on particular local and site circumstances. However, the value areas are evidenced based and logical for ease of implementation, and to inform policy appropriately.
PfE JPA14 [now JPA12] Broadbent Moss allocation is currently identified within Affordable Housing Zone 2. Unsure how the zonal definitions have been created but the area immediately to the south (Derker) has relatively high levels of affordable homes and relatively low market values. The application of the policy here could therefore adversely affect the viability of development and it does not reflect the characteristics of the location. Whilst the policy does cater for needs and viability considerations, we believe that Figure H1 should be amended to include the JPA14 land that has been removed from the Green Belt and the area to the south within Affordable Housing Zone 3.	<p>The Local Plan Viability Assessment (2025) updates the value areas identified for Oldham (to that of those set out at Draft Plan stage, based on the PfE Viability Assessment) based on evidence including market research, new build/ second-hand achieved values, and deprivation. It is acknowledged that it is not perfect and there may be particularly high value schemes in a lower value area and vice-versa depending on particular local and site circumstances. However, the value areas are evidenced based and logical for ease of implementation, and to inform policy appropriately.</p> <p>The value areas are based on wards and so the caveats set out above apply. In any case, it is considered that Policy H5 provides exceptional circumstances to consider site-specific characteristics. In addition, Policy IN2 'Planning Obligations' allows for considerations of viability issues to be considered on a site-specific basis where the need for such is evidenced by a change in circumstance which could not have been evident in the whole plan Viability Assessment, in line with NPPF and PPG.</p>

4.134. A detailed summary of responses can be found in the Schedule of Comments and the Council's Response document.

4.135. There are no specific Duty to Co-operate issues associated with this policy.

Policy Approach

4.136. In line with National Planning Policy and PfE, which requires that local planning policies consider affordable housing needs, identify targets for provision, and set out the type of affordable housing required (which should provide a mix of tenures), Policy H5 sets out the affordable housing requirements for Oldham including the amount required, type and tenure.

4.137. National planning policy sets out that affordable housing should not be sought for non-major development (except in designated rural areas). As such, the policy states that all developments that provide 10 or more net additional homes (major development), will be required to deliver an appropriate portion of the total site capacity as affordable housing⁶⁵ in line with the value area in which the site is located and the land type (a table of the requirements and a map of the value areas is provided in the policy). Table 15 below sets out the requirements, a map of the value areas is provided at Figure 4 above.

Table 15: Affordable Housing Requirements

Value Area	Brownfield Land	Greenfield Land
High Value	20% of site capacity	25% of site capacity
Medium and Low Value	10% of site capacity	10% of site capacity

4.138. As set out in section 3 above, the Oldham Local Plan Viability Assessment (2025) has informed this policy requirement. A balanced approach has been taken to decide what percentage of the site capacity should be provided for affordable housing according to the value area and land type, based on the evidence set out in the Viability Assessment but also considering the affordable needs in the borough.

4.139. It is considered that the (minimum) 10% requirement for brownfield and greenfield land within the medium and low value areas is appropriate, because whilst viability is difficult for both land types in these areas, it is still important that an appropriate level of affordable housing is delivered in these areas to meet local housing needs. As local evidence (the LHNA) has shown (as set out in section 3 of this topic paper) no areas of the borough are considered 'affordable' and there is a net shortfall of 669 affordable homes each year (over a 10-year period). There is particular affordability pressures present in the South district (for buying) and West district (for

⁶⁵ Affordable housing as defined in Annex 2 of the National Planning Policy Framework.

buying and renting). Moreover, the LHNA identifies that developments should provide a split of 80% market housing and 20% affordable housing.

- 4.140. Therefore, given this evidence of affordable housing need it is considered that it is not possible to identify a lower housing requirement than 10%, despite the viability challenges, and to still contribute to meeting local housing needs as is required by national planning policy.
- 4.141. In any case, affordable housing has been provided on sites in medium and lower value areas in the past, and viability may improve in the borough over time. It is also important to reiterate that the Viability Assessment costs used were a 'worst-case scenario'. Many of the assumptions are cumulatively negative. As such, there is scope for some flexibility and pragmatism for policies in the Plan.
- 4.142. In addition, the Council actively support developers to access funding for affordable housing delivery and work closely with Registered Providers, which can further support viability. In this context, it is considered that this requirement is appropriate.
- 4.143. For brownfield sites in high value areas, the requirement is in line with evidence set out in the Viability Assessment, which identified that a 20% requirement would be achievable for most typologies tested. The requirement is slightly increased to 25% for greenfield sites in high value areas, again in line with the Viability Assessment which noted that schemes in this location could afford more than the 20% affordable housing requirement for most typologies tested. Greenfield sites tend to have less development costs compared to brownfield sites. It is considered that these requirements are appropriate as they aim to maximise affordable housing delivery where it is viable to do so to contribute to meeting local affordable housing needs.
- 4.144. In any case the Reasoned Justification clarifies that the requirements should be considered as a minimum, and that the Council support and encourage higher proportions of affordable housing to be provided, including sites which are fully affordable housing developments.
- 4.145. An affordable housing requirement for Green Belt sites is not provided in this Plan. Any applications for Green Belt land that come forward will be assessed in line with national planning policy ('Golden Rules'), national planning guidance and, where appropriate, available local evidence. Other requirements within Policy H5, and other local plan policies will apply, however.
- 4.146. The policy identifies a tenure split required for new affordable housing should be provided as follows: 25% affordable rented; 35% affordable home ownership; and 40% social rented. This requirement is based on local evidence of affordable housing need set out in the LHNA. It also recognises the need and aim at a local level and a national level to increase the amount of social housing.
- 4.147. The policy does allow for exceptions to the prescribed tenure mix in certain circumstances as set out in the policy.
- 4.148. To ensure the policy can be reflective of local needs over the longer term, the policy Reasoned Justification sets out that affordable housing requirements, tenure and mix will be kept under review throughout the lifetime of the Plan and will be updated as appropriate, in line with updated local evidence.

- 4.149. The policy also references Policy H3 in terms of an appropriate housing mix for affordable homes, although it allows for flexibility in the mix to consider particular local housing needs.
- 4.150. The policy sets out requirements for the delivery of affordable housing as part of new development, including that:
- developments should provide affordable housing onsite, however, by exception, it may be more appropriate for the payment of a commuted sum/ developer contribution to off-site provision, or a mixture of onsite/off-site provision to be provided to meet local housing needs.
 - 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 (see Policy IN2).
 - 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 address the borough's affordable housing need.
- 4.151. The policy sets out exceptional circumstances to providing the full amount of affordable housing, including:
- Where 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); and
 - Developments which involve the conversion or demolition of a vacant building, through the application of vacant building credit (VBC), to support viability. In determining whether VBC applies, the Council will assess the evidence submitted by the applicant and its compliance with the criteria set out in PPG.
- 4.152. At Draft Plan stage there was a policy within the housing chapter on VBC. It was considered that the policy was not necessary, given national policy and guidance. However, references to VBC have been added to this policy which notes that the Council will use criteria set out in PPG to determine whether it can be applied. As set out in the policy Reasoned Justification, VBC allows for a deduction of a financial 'credit', equivalent to the existing gross floorspace of any relevant existing vacant buildings within the redline boundary of the application site brought back into lawful use or demolished for redevelopment, from the overall affordable housing contribution. The Reasoned Justification clarifies that a site which has last been used for employment purposes must also meet the requirements for redevelopment as set out in policies E3 or E4, regardless of whether the building is now vacant. In addition, the requirements of policies E5 and HE4 will also apply if the building is a mill⁶⁶.
- 4.153. The Reasoned Justification sets out that Policy IN2 provides further detail on planning obligations and viability.

⁶⁶ Oldham Mills Strategy identified Oldham's Textile Mills, available at: https://www.oldham.gov.uk/info/201236/evidence/2819/oldham_mills_strategy

Monitoring

4.154. Policy H5 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.

4.155. The Local Plan indicator that will be used to monitor this policy is:

- Number of completions for new-building affordable housing by tenure, type and size

4.156. Policy M1 of the Local Plan sets out that where monitoring identifies underperformance or unintended outcomes:

- Further guidance on the relevant policy matter may be produced through the preparation of Supplementary Planning Documents.
- Policy revisions and an early review of the Local Plan may be triggered.
- Engagement with stakeholders may be undertaken to address delivery barriers.

4.157. As this policy is informed by PfE (Policy JP-H2), the PfE monitoring framework will also help to monitor this chapter⁶⁷. The PfE monitoring indicator that will help to monitor this policy is:

- Number of new affordable homes completed

4.158. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy H5.

Integrated Assessment

4.159. The policy scored a mixture of significantly positives, positives and neutrals. No negative scores were given, and no mitigation or enhancement was required as a result of the IA.

4.160. The HRA has screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this policy.

Policy H6: Houses in Multiple Occupation

Summary of evidence

4.161. As of the most recently available data, in July 2025 there was estimated to be 384 HMOs in Oldham. This represents a 25% increase from 2020 (306 estimated HMOs). Whilst the increase is not sharp, there has been a consistent increase between 2020 and 2025.

4.162. The heat map at Figure 6 of this document identifies the spatial distribution of HMOs in Oldham. It shows that whilst HMOs are spread across many areas of the borough, there are clusters located within and around inner Oldham, along key transport routes, and within and around several of the borough's centres.

⁶⁷ As PfE is a Joint Plan of Bury, Bolton, Oldham, Manchester, Rochdale, Salford, Tameside, Trafford and Wigan, the PfE indicators apply plan-wide (including all districts). As such indicators where delivery figures are monitored represent the delivery across all districts, not just Oldham.

- 4.163. 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 is needed in the borough.
- 4.164. However, issues can arise where family homes are converted to HMOs, as this reduces the number of larger properties available for families. Evidence indicates that almost half of the borough's identified HMOs have been converted from a single household dwelling. The LHNA has identified that there is a lack of family housing, including larger housing of 4+ bedrooms, in the Borough.
- 4.165. Furthermore, extensive concentrations of HMO development can result in amenity issues and change the character of an area. It is important that HMO 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. HMOs should be appropriate for occupants and provide a high-standard of living and not perpetuate levels of overcrowding being experienced in the borough.
- 4.166. In order to give the Council greater control in ensuring the appropriate distribution and management of HMOs, Oldham Council has recently introduced an Article 4 Direction to remove the permitted development right for the change of use from dwelling houses (Use Class C3) to Houses in Multiple Occupation (HMOs) for up to six residents (Use Class C4)⁶⁸. The Article 4 Direction came into effect on 1 January 2026 and applies to the whole borough of Oldham.

Draft Local Plan Consultation and Duty to Co-operate

- 4.167. As part of the Draft Local Plan consultation, minimal comments were received in relation to HMO Policy H10 (now Policy H6).
- 4.168. The comments received/ issues raised and the Council's response to these issues are summarised in Table 16 below.

Table 16: Draft Local Plan Consultation Summary and Response – Houses in Multiple Occupation

Comment/ Issue Summary	Council Response
With the increase in HMO developments, it is key to ensure that current larger residential properties are not utilised above unused property that is likely to fall into disrepair. To ensure all HMO's follow minimum recommended specifications need to ensure that the licensing process in Oldham is fit for purpose. Parking also needs to be addressed as the majority of people living in these types of property are cars owners.	The policy sets out several criteria to ensure the appropriate development of HMOs, including 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; and where it complies with the relevant design and amenity standards as outlined in Policy D1, and any existing or future HMO standards or guidance developed by the Council.

⁶⁸ The Article 4 Direction would be made under the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

Comment/ Issue Summary	Council Response
Support the policy but define HMO.	HMOs are defined in the policy Reasoned Justification.

4.169. A comment was also made that there are too many HMOs. This does not relate directly to the policy wording itself, however it is considered that whilst the policy will not necessarily reduce the number of HMOs, it will ensure HMO development is appropriate and high-quality.

4.170. Several respondents also noted support for the policy.

4.171. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.

4.172. There is no specific Duty to Cooperate issues associated with this policy.

Policy Approach

4.173. Policy H6 sets out that HMOs will be supported where the proposed development:

- 1) 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;
- 2) 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)⁶⁹ will result in HMOs representing 10% or more of properties within a 50m radius measured from the centre of the application site;
- 3) Ensures that no two adjacent properties apart from those that are separated by a road are converted to HMOs; and
- 4) Complies with the relevant design and amenity standards as outlined in policy D1, and any existing or future HMO standards or guidance developed by the Council.

4.174. 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 website⁷⁰, and all applications for HMOs are required to provide a Statement of Community Engagement and Impact Assessment.

4.175. The policy 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. In addition, HMOs should not occupy ground floor uses (in this location), unless the proposed development would comply with the exceptions listed in Local Plan Policy C3 'Changes of use and redevelopment within the borough's centres'.

⁶⁹ Including those which are permissioned but have not yet been implemented

⁷⁰ At the following webpage:

https://www.oldham.gov.uk/info/201198/help_for_landlords/258/houses_in_multiple_occupation

- 4.176. The policy has been developed in line with the evidence base. It primarily seeks to support the development of high-quality HMOs in appropriate locations, whilst seeking to ensure the number of HMOs does not result in an undue concentration within a particular area, which could negatively impact on the character or amenity of an area.
- 4.177. The threshold identified within the policy (criteria 2) is 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 area. In some circumstances, it may be acceptable for exceptions to the thresholds to apply, this will be considered on a case-by-case basis. The criteria wording (i.e. 'Permission *may* not be granted...') provides sufficient flexibility in this regard.
- 4.178. Criteria 2 and 3 of the policy will be assessed on a case-by-case basis using available evidence. Evidence will include the existing evidence related to HMOs in Oldham, as set out in section 3 of this topic paper, and updates to this evidence which the local plan monitoring indicator related to this policy (set out below), will assist with. Monitoring of HMOs will also be more efficient and accurate now with the Article 4 Direction in place, meaning all HMO development has to apply for planning permission.
- 4.179. Sometimes community perceptions of HMOs can be negative based on experienced or perceived issues with this type of housing. 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 concerns or issues before they arise, therefore aiming to foster more positive perceptions and outcomes in relation to HMO development.
- 4.180. Whilst the evidence base for this policy has been extensively updated since the Draft Plan Stage to support the introduction of the Article 4 Direction, the policy itself has had minimal changes.

Monitoring

- 4.181. Policy H6 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.
- 4.182. The Local Plan indicator that will be used to monitor this policy is:
- Number of planning applications approved for Homes in Multiple Occupation
- 4.183. Policy M1 of the Local Plan sets out that where monitoring identifies underperformance or unintended outcomes:
- Further guidance on the relevant policy matter may be produced through the preparation of Supplementary Planning Documents.
 - Policy revisions and an early review of the Local Plan may be triggered.

- Engagement with stakeholders may be undertaken to address delivery barriers.

4.184. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy H6.

Integrated Assessment

4.185. The policy scored a mixture of significantly positives, positives and neutrals. No negative scores were given and no mitigation or enhancement to the policy was required as a result of the IA.

4.186. The HRA has screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this policy.

Policy H7: Gypsies, Travellers and Travelling Showpeople

Summary of evidence

4.187. The latest GTAA (2024) identified no need for Gypsy and Traveller pitches in Oldham up to 2041.

4.188. The needs of Travelling Showpeople are presented in the 2018 GTAA and this remains appropriate evidence for the preparation of the Oldham Local Plan. The 2018 assessment found a shortfall of 204 plots across Greater Manchester up to 2035/36, driven by household formation and overcrowding on existing yards. In addition, the need to provide for 59 transit pitches across the Greater Manchester study area was also identified.

4.189. Whilst there is no identified need for Gypsy and Traveller pitches in Oldham, it is recognised that additional need may arise over the plan period. Further work to understand and identify the spatial distribution of plots for Travelling Showpeople and transient pitches may also include the identification of specific sites in Oldham in the future.

Draft Local Plan consultation and Duty to Co-operate

Draft Local Plan consultation

4.190. At Draft Plan stage, the policy was numbered as H12.

4.191. Minimal responses were received at Draft Plan stage. There were five respondents who stated they supported the policy and one who objected to the policy in general.

Duty to Cooperate

4.192. In terms of meeting the need for gypsies and travellers, the GTAA recommends that councils should consider regularising sites that are not permanently authorised and additional pitch provision using existing sites (including through expansion or intensification and also considering future potential household dissolution). Further work is also recommended to review the potential for additional pitch development on existing sites and the occupancy of permanent pitches.

4.193. The GTAA recommends that the 10 Greater Manchester councils (including Oldham) should consider the issue of meeting the overall identified need for Greater

Manchester collectively, with the potential redistribution of need being an option to meet need.

- 4.194. Notwithstanding evidence in the GTAA on need, additional need may arise over the plan period, for instance households moving into Greater Manchester, and as a result require further work be undertaken to understand and identify the spatial distribution of plots for Travelling Showpeople and transient pitches (which may include the identification of specific sites in Oldham in the future).
- 4.195. It is therefore recommended that councils have criteria-based policies to inform future planning applications for private sites should they arise. In this regard, the Local Plan includes this policy which sets out criteria to provide a basis on which planning applications for Gypsy, Traveller and Travelling Showpeople accommodation can be determined. Oldham Council will work collaboratively with the other Greater Manchester districts to consider the need for provision collectively in the future as appropriate.

Policy Approach

- 4.196. Policy H7 has been developed in line with national policy and available evidence. It does not identify particular sites, as evidence has not indicated any specific need for Oldham at this time (as set out above), but rather it sets out a series of criteria to ensure that if applications come forward for Gypsy, Traveller and Travelling Showpeople accommodation the proposed provision is sustainable and appropriate.
- 4.197. The policy sets out that “proposals for Gypsies, Travellers and Travelling Showpeople sites will be supported where they are consistent with national and local guidance and policies and meet the following criteria:
- The site is located within a sustainable location, with access to local services and facilities, including schools, healthcare, shops and public transport;
 - The site is not subject to physical constraints or other environmental issues that cannot be mitigated to an acceptable level;
 - The site provides adequate space for pitches / plots, on-site facilities and operational needs including the on-site parking, turning and servicing of vehicles and storage and maintenance of equipment;
 - The development protects the residential amenity and safety of current and future occupiers of the site and neighbouring uses;
 - There is safe and convenient vehicular and pedestrian access to the road network;
 - There is, or can be, access to appropriate infrastructure required to meet the needs of the occupiers (including facilities for sewage and waste disposal, water, power supplies and drainage); and
 - Appropriate screening and landscaping is used to mitigate the visual impact on the surrounding area.

4.198. In addition to the above, the policy sets out that proposals for Travelling Showpeople sites will also be required to demonstrate that:

- There is safe and functional access for larger vehicles; and
- The proposed development is compatible with surrounding land uses.

4.199. The policy has had limited changes since the Draft Plan stage, except for minor wording and structure amendments – to clarify the requirements for Travelling Showpeople sites, which may be in addition to those which apply to provision for Gypsies and Travellers.

4.200. Should the need to identify pitches for Gypsy, Traveller and Travelling Showpeople within Oldham change in the future, the policy provides a basis to deal with applications for new provision appropriately.

Monitoring

4.201. Policy H7 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.

4.202. The Local Plan indicator that will be used to monitor this policy is 'Net additional pitches (Gypsy and Traveller)'.

4.203. There are no relevant PfE monitoring indicators to assist in monitoring this policy.

4.204. Policy M1 of the Local Plan sets out that where monitoring identifies underperformance or unintended outcomes:

- Further guidance on the relevant policy matter may be produced through the preparation of Supplementary Planning Documents.
- Policy revisions and an early review of the Local Plan may be triggered.
- Engagement with stakeholders may be undertaken to address delivery barriers.

4.205. The monitoring framework is therefore considered to be appropriate for Policy H7.

Integrated Assessment

4.206. The policy scored a mixture of positives and neutrals. No negative scores were given and no mitigation or enhancement to the policy was required as a result of the IA.

4.207. The HRA has screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this policy.

5. Conclusion

Providing an appropriate strategy

5.1 Policies H1 to H7 of the Oldham Local Plan: Publication Plan provide the policy framework for ensuring that we deliver a diverse and sustainable housing offer across the borough that is attractive and meets the needs of different sections of the population at different life stages.

5.2 In terms of the test of soundness listed at paragraph 36 of NPPF it is considered that these have been met as follows:

- a) **Positively prepared:** the Oldham Local Plan: Publication Plan supports delivery of PfE which provides the strategic direction and context for the borough. The Local Plan sets out how the housing needs identified in PfE will be delivered locally in Oldham whilst achieving sustainable development. The housing policies set out a positive strategy to support the delivery of housing, which is accessible, appropriate and contributes to meeting local housing needs. Policy H1 has been positively prepared as it is based on a comprehensive assessment of the borough's objectively assessed need housing need and demonstrates how the housing supply will deliver this need over the plan. It has been prepared in line with PfE Policy JP-H1, which sets out the borough's housing requirement. Other policies within the Homes Chapter provide a positive strategy to deliver homes which: meet the boroughs particular housing needs for several housing need groups (including affordable housing, housing for older people, disabled people, children and care leavers, and gypsies and travellers); deliver housing which is of the right mix and type; and ensures the appropriate development of HMOs, in line with proportionate local evidence. The policies reflect national policy requirements for achieving sustainable development.
- b) **Justified:** policies H1 to H7 provide an appropriate strategy in relation to housing matters across Oldham. The housing policies are justified as they represent the most appropriate strategy when considered against the reasonable alternatives and are supported by a proportionate and robust evidence base. Reasonable alternative housing growth, distribution, and housing policy options were identified, consulted upon and tested through the Sustainability Appraisal. This included reasonable alternatives related to affordable housing requirement, HMO policy and housing allocations. In terms of housing requirement (Policy H1), reasonable alternatives for housing growth and distribution were considered as part of PfE, as Policy H1 is informed by PfE Policy JP-H1. The outcomes of the appraisal of these options iare set out within the Integrated Assessment.

Several housing policies have changed since Draft Plan stage, informed by consultation and stakeholder feedback. The preferred approach therefore reflects local evidence relating to housing need, land supply and stakeholder engagement. The policies help to support the plan's vision and objectives ensuring that at least 11,560 new homes of different sizes and types, including affordable housing are delivered, that meet the needs of Oldham's residents. The new homes, delivered in sustainable and accessible locations to ensure the effective use of land, will contribute to inclusive and vibrant communities where everyone can live. This also supports the Oldham Corporate Plan and Oldham Plan missions for Oldham to be a Great Place to Live with more affordable, quality homes.

- c) **Effective:** the Oldham Local Plan: Publication Plan supports delivery of PfE which sets out the borough's housing and employment needs .The plan period of up to 2039 reflects that of PfE and continued effective joint working arrangements with PfE districts on cross-boundary strategic matters will support delivery of the

joint and local plans. Deliverability of the Oldham Local Plan: Publication Plan is also evidenced by the Infrastructure Delivery Plan and Statement of Common Ground. Several of the housing policies are directly informed by PfE policies including JP-H1 in terms of housing requirement, JP-H2 in terms of affordable housing, JP-H3 in terms of housing mix and JP-H4 in terms of housing density. In this regard, the policies ensure that Oldham delivers housing which will contribute to meeting housing needs across the PfE plan area.

- d) **Consistent with national policy:** policies H1 to H7 support delivery of sustainable development in accordance with relevant national policy, in particular:
- i. By ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. Policy H1 sets out the borough's housing requirement and demonstrates how this will be delivered by the identified future housing land supply.
 - ii. By setting out requirements for the development of housing, including for the size, type and tenure of housing, which will contribute to meeting the needs of different groups in the community.
 - iii. Ensuring the effective use of land by requirement housing to be delivered at certain densities in line with its relative location and accessibility. The policies also support the development of previously developed land to support sustainable development, and the effective use of land.

Appendix 1 – Housing Land Supply Evidence

Contained in a separate document.