Hearing Statement – Matter 3

Pegasus Group on behalf of North Lumb Farm Ltd.

Land at Failsworth Road, Woodhouses

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Appendix 1 – Housing Land supply for Land west of Failsworth Road, Woodhouses

1. Introduction.

1.1. Pegasus Group have been instructed on behalf of their client, North Lumb Farm Ltd, to prepare statements in respect of their land holding at Land at Failsworth Road, Woodhouses.

1.2. This Statement deals with Matter 3 – Housing Policies (including housing land supply)

2. Matter 3 Questions.

2.1. The following provides a response to some of those questions identified within the Matters, Issues and Questions document (EL1.004b).

Issue 4: Does the Plan provide an appropriate supply of deliverable and developable sites to meet identified needs and align with national policy?

Does the Plan identify a supply of specific, deliverable sites for years one to five of the plan period, including consideration of the relevant buffer as required by paragraph 74 of the 2021 Framework? Has sufficient regard been had to lead in times and build out rates, and is the Plan positively prepared and effective as a result?

2.2. The relevant housing requirement is that contained within the PfE as out below:

- 404 homes per year (2022–2025)
- 680 homes per year (2025–2030)
- 772 homes per year (2030–2039)

2.3. It should be noted that this is significantly below the current standard method for determining local housing need (LHN). The current LHN identifies a minimum need of 972dpa for Oldham. Oldham's PfE housing requirement is only 70% of the current LHN, meaning circa 30% of the housing needs of the area are not being met in Oldham.

2.4. The following table highlights the implications of the PfE stepped requirement, as the five-year housing land supply will get progressively more difficult for Oldham to achieve in each year until 2030/31. However, following the fifth anniversary of the adoption of the PfE in March 2029 the five-year supply will be assessed against the relevant LHN figure, this is currently 972 dwellings per annum. At this point, presuming the PfE is not updated earlier, the future base five-year supply requirement will be 4,860 dwellings based upon the current LHN calculation.

Table 1: Future five-year housing land supply requirements

Base year	Requirement
2025/26	3,400
2026/27	3,492
2027/28	3,584
2028/29	3,676
2029/30	3,768

2030/31	3,860

2.5. In terms of delivery, Table 2 below demonstrates how the Council have delivered in comparison to the stepped PfE targets. The council has delivered 37 dwellings less than the PfE housing requirement, based upon the stepped trajectory.

Table 2: Housing Delivery (Plan Period)

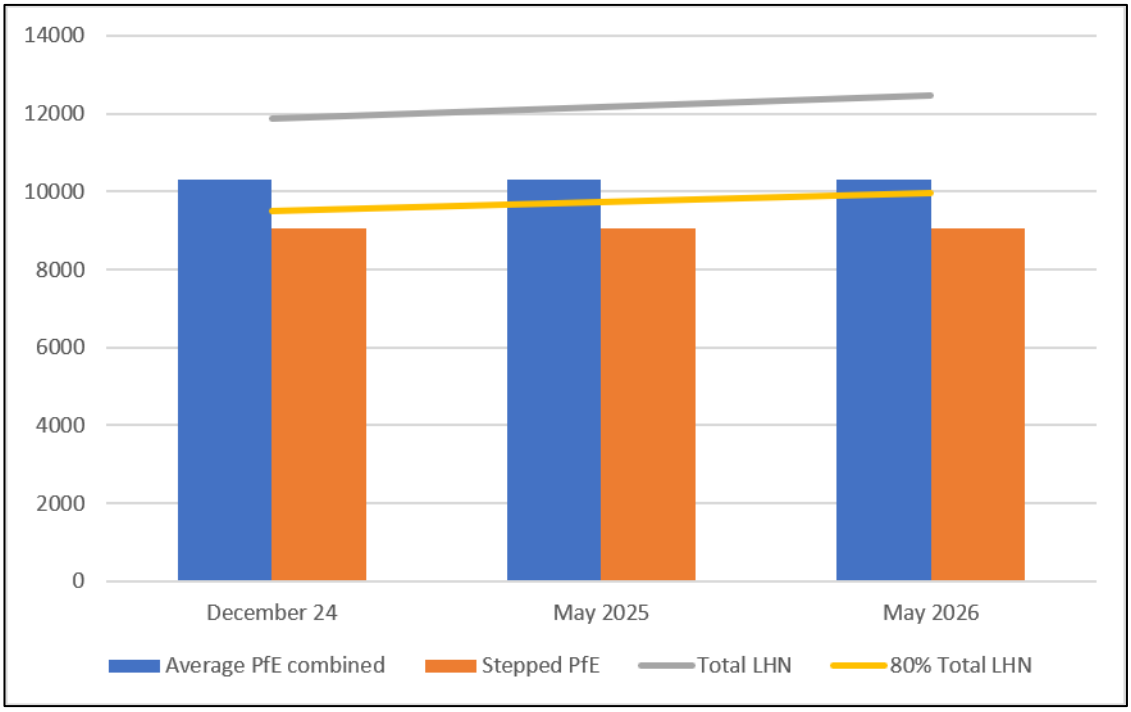
Year	Requirement	Dwellings
2022/23	404	403
2023/24	404	420
2024/25	404	578
2025/26	680	456
Total	**1,894**	**1,857**

2.6. Paragraph 9 of Annex D to the 2026 NPPF requires a buffer to be applied to the five-year housing land supply requirement. The scale of the buffer is determined by the most recent Housing Delivery Test (HDT) result. This is consistent with paragraph 74 of the 2021 NPPF.

2.7. Given, Oldham's PFE housing requirement is only 70% of the new Standard Methodology, if this is considered in isolation, it would trigger the 20% requirement. However, footnote 76 of the NPPF does identify that for joint local plans, the percentage should be applied in aggregate across the joint local plan area. In this instance the PfE requirement is currently 83% and as such a 5% buffer is required.

2.8. It must, however, be recognised that this is a marginal position and any increase in the LHN calculation across the PfE authorities would lead to a 20% buffer being applied. Figure 3.1 below demonstrates that the PfE combined requirement only exceeds the 80% LHN figure based upon the average requirement over the plan period. However, since the introduction of the updated LHN calculation in December 2024 the difference between the combined average and the combined LHN calculation has decreased by circa 2% each year from 86.8% in December 2024 to just 82.6% in May 2026. It is, therefore, likely that a 20% buffer will be required in Oldham within the next 6 to 18 months.

Figure 1 – PfE combined housing requirement compared to combined PfE authorities LHN



2.9. Based upon our analysis above the five-year housing land supply requirement on 1st April 2025 and 1st April 2026, is set out in table 3 below.

Table 3: Five-year housing land requirement

Element	1st April 2025	1st April 2026
1. Plan requirement	680*5	680*4 + 772
2. Under-supply	0	37
3. 5% buffer	170	176
4. **Five-year requirement (step 1+2+3)**	**3,570**	**3,705**

2.10. This requirement will only increase in future years and is likely to see a significant step-change in 2027 or 2028 once the 20% buffer is required.

Deliverability of the Supply

2.11. Within its response to the Inspectors' questions (ref: EL1.004b), the council identifies four caveats in relation to the supply identified in the trajectory. These serve to confuse matters rather than providing any clarity or certainty upon the deliverable supply. In summary the four caveats are set out below:

i. The trajectory is based upon the housing land supply position on 1 April 2025 and does not represent a full update for 2026;

ii. Housing land supply is changeable and as such the information provided is the best available at the time of publication;

iii. Whilst the update provides site status on 1st April 2026, later updates are also included; and

iv. Since 1st April 2025, 54 additional sites have gained planning permission which were previously unknown. These account for 222 homes. A further 14 sites gained permission and are now under construction for a total of 39 dwellings.

2.12. In reference to point i, whilst an update in site progress since 1st April 2025 may be useful context it does little to identify whether the council can justifiably demonstrate a five-year supply of deliverable housing sites, either now or upon adoption.

2.13. The demonstration of a five-year supply is necessarily a point in time assessment which should be based upon the evidence available at that point in time. Sites which latterly can be identified as deliverable cannot be simply added to the supply at a later stage, to do so would create an inequitable assessment of the actual housing land supply position. This long-standing fundamental aspect of five-year housing land supply assessments was succinctly and eloquently provided by the Inspectors recommendations to the Secretary of State (paragraph 326) in the recovered Farleigh Fields appeal decision (3153935) which states inter alia:

"It is common ground that it is appropriate to assess supply for the five-year period starting from 1 April 2016, however NSC includes sites in its anticipated supply that have been consented since that base date. As the appellant identifies, there is a significant body of appeal decisions in which Inspectors have indicated that such an approach is not appropriate in the absence of proper accounting. I share those Inspectors' broad view that if such sites are to be included then account must also be taken of the housing requirement that has accrued during the same period. NSC has not factored in that increased requirement or the increased backlog accrued after 1 April 2016, such that there is an imbalance in its inputs and a consequential artificial inflation of its supply of housing land over the five-year period in relative terms. Accordingly, all of those sites, which amount to 328 dwellings, should be omitted for the purposes of this exercise."

2.14. The Secretary of State agreed in paragraph 18 of the appeal decision that:

"…For the reasons set out by the Inspector at IR325-327, he concludes that 328 units should be removed from supply, reducing the subtotal further to 7,885 (IR326)."

2.15. Point ii is correct. However, it is unclear why the council has failed to update its five-year housing land supply position given the evidence it is attempting to present to the Inspector. The evidence within the 2026 Housing Trajectory (ref: EL2.001a) is purportedly based upon known site status on 1st April 2026. Given that the response to the Inspectors questions also identifies delivery to this base date the council should have all the necessary information to update its five-year housing land supply assessment to 1st April 2026.

2.16. With relation to point iii, as discussed above a clear base date needs to be set to determine the five-year supply. Without such a base date the assessment cannot be considered equitable as it does not provide a balanced picture of both supply and completions.

2.17. In relation to point iv, to include these sites within the five-year supply they would need to meet the deliverability test set out within the NPPF annex at the base date of the relevant assessment, clearly, they do not meet this on 1st April 2025.

2.18. Even more fundamental than the issues with the caveats are the clear inaccuracies within the 2026 Housing Trajectory completions data. In the monitoring year 2025/26 it identifies a total of 750 dwellings completed dwellings. However, table 2 of the council's response to the Inspectors questions suggests that just 456 completions in that monitoring year. This is a discrepancy of 284 dwellings representing just 61% of the claimed supply. If these inaccuracies were followed throughout the five-year period 2025-2030 the actual completions over this period would be just **2,772 dwellings or just 3.88-years supply.**

2.19. Indeed, it should be noted that none of the annual completions totals within the 2026 Housing Trajectory accord with those in table 2. Albeit most are lower. It is acknowledged that discrepancies in the years prior to 2025/26 could, potentially, be explained by some sites completing prior to the 1st April 2025 and therefore, legitimately, no longer being included within the trajectory. However, this cannot be true for the additional dwellings identified as completions within the trajectory in 2025/26, as the 2026 Housing Trajectory formed an update to the 2025 assessment and as such this should have been considered.

2.20. The 2026 Housing Trajectory is, therefore, at best an incomplete assessment. It provides little additional clarity either upon the five-year supply situation or the plan period supply. This goes to the heart of soundness of the plan. Without a demonstrable five-year supply upon adoption the plan cannot be considered positively prepared, justified, effective or consistent with national policy as it will effectively be out of date upon adoption.

Supply Evidence

2.21. The council's housing supply is detailed in the SHLAA (2025), further explained in the council's Housing Topic Paper (January 2026) and updated by the 2026 Housing Trajectory.

2.22. The updated information within the 2026 Housing Trajectory provides a commentary upon the deliverability of sites within the trajectory. This is based upon the position on 1st April 2026. However, this commentary is extremely limited in detail. It provides little detail to determine when and if a detailed application will be brought forward and delivery commence on site. It provides no guarantees either from the developer or the council. Indeed, comments such as the trajectory being based upon 'indicative phasing' (see ref: SHA2000) are common. Suggesting the council's deliverability evidence is little more than assertion.

2.23. In relation to the NPPF definition (both 2021 and 2026) they identify that sites "…should be available now, offer a suitable location for development now…". Those with a detailed permission, outline permission, permission in principle or benefit from an allocation or being included on a brownfield register can, in most instances, be considered to fulfil this initial requirement. However, much of the council's supply is reliant upon SHLAA sites. The SHLAA recognises it is simply a technical document which infers no planning status to a site.

Should the council wish to infer planning status to sites in the 2025 SHLAA it should seek to allocate those sites. The suitability of many sites in the supply is, therefore, unknown as they are simply SHLAA sites with no planning status and therefore fail this initial deliverability test set by the NPPF definition. Further Part B of the NPPF definition of a deliverable site identifies categories of sites which could be considered deliverable with clear evidence, this does not include SHLAA sites.

2.24. For those sites which do fall within the Part B sites categories the Secretary of State (SoS) provided useful guidance in a recovered appeal on land off Audlem Road/Broad Lane, Stapeley, Nantwich (APP/RO660/A/13/2197532 & APP/RO660/A/13/2197529) on what constitutes clear evidence. Within paragraph 21 of this decision the SoS considers that:

"*…the following should be removed from the supply: sites with outline planning permission which had no reserved matters applications and no evidence of a written agreement; a site where there is no application and the written agreement indicates an application submission date of August 2019 which has not been forthcoming, with no other evidence of progress; and a site where the agent in control of the site disputes deliverability…*"

2.25. Numerous Inspectors have also grappled with the issue of what constitutes clear evidence for part B sites. In the case of Land at Caddywell Lane/Burwood Lane, Great Torrington, Devon (APP/W1145/W/19/3238460) this was eloquently expressed by the Inspector Harold Stephens who noted (paragraph 56 and 57):

"This indicates the expectation that `clear evidence' must be something cogent, as opposed to simply mere assertions. There must be strong evidence that a given site will in reality deliver housing in the timescale and in the numbers contended by the party concerned.

Clear evidence requires more than just being informed by landowners, agents or developers that sites will come forward, rather, that a realistic assessment of the factors concerning the delivery has been considered. This means not only are the planning matters that need to be considered but also the technical, legal and commercial/financial aspects of delivery assessed.

Securing an email or completed pro-forma from a developer or agent does not in itself constitute `clear evidence'. Developers are financially incentivised to reduce competition (supply) and this can be achieved by optimistically forecasting delivery of housing from their own site and consequentially remove the need for other sites to come forward."

2.26. It is notable that in Oldham's case the council does not even go as far as emails or written pro-formas and as such the site trajectories should be considered as no more than mere assertion.

2.27. In the appeal decision on land south of Hamstreet Road, Hamstreet (APP/E2205/W/25/3360094) the Inspector found that:

- allocated sites without a planning application are not deliverable (para 48, 49)
- allocated site with a pending full application which was subject to objections from statutory consultees was not deliverable (para 50).

- Sites with resolution to grant outline permission were not deliverable (paras 52, 53, 54).

- Site with outline permission but without a Reserved Matters application was not deliverable (para 56).

2.28. These appeal decisions and many others reinforce that evidence of deliverability must be cogent and site-specific, rather than relying on general assertions, ownership intentions, undetermined applications or unevidenced assumptions about delivery.

2.29. We have carefully scrutinised the sources of supply contained within the Council's evidence, which is contained within **Appendix 1** of this hearing statement. We provide a summary table below which identifies our assessment of the sources of supply, based on the analysis and evidence provided above and compared this with the Council's assertions in relation to the sources of supply.

Table 4: Sources of supply comparison

Sources	Council		Pegasus	
	2025-2030	2026-2031	2025-2030	2026-2031
Completed	146	82	146	0
Under construction	2110	1515	1699	1442
Extant PP	1061	1635	453	626
Lapsed / No longer deliverable	0	2	0	0
Pending	102	140	0	0
Potential (unpermissioned)	565	808	0	0
PfE Strategic Allocations	573	863	87	75
Other	7	5	0	0
Clearance Allowance	-20	-20	-20	-20
Lapse Rate	0	0	-53	-74
Total	**4544**	**5030**	**2312**	**2049**

Five-Year Supply

2.30. In terms of the Council's five-year supply, our analysis identifies a **3.24-year supply** for the period 2025-2030, representing a deficit of 1,258 homes.

Table 5: Five-year housing land supply 2025-2030

Element	Dwellings
1. Housing Requirement	3,400
2. Under-supply	0
3. 5% buffer	170
4. Five-year requirement (step 1+2+3)	3,570

5. Deliverable Supply	2,312
6. Year's supply	**3.24**

2.31. It is notable that the supply deteriorates slightly once the council's evidence in relation to the period 2026-2031 is taken into consideration. This suggests a supply of just **2.77-years,** a deficit of 1,656 dwellings.

Table 6: Five-year housing land supply 2026-2031

Element	Dwellings
1. Housing Requirement	3,492
2. Under-supply	37
3. 5% buffer	176
4. Five-year requirement (step 1+2+3)	3,705
5. Deliverable Supply	2,049
6. Year's supply	**2.77**

2.32. To address these deficiencies, the council needs to provide a coherent, up-to-date housing land supply assessment using a consistent base date, reconciled completion figures and robust site-specific delivery evidence. The trajectory must distinguish between longer-term development potential and genuinely deliverable supply, avoid double counting and reflect realistic capacities and delivery rates. Where the resulting supply remains insufficient, the plan should identify and secure additional deliverable housing opportunities, including through additional allocations, rather than rely upon unsupported assumptions about existing sites.

2.33. The council's evidence does not demonstrate that the emerging Local Plan can secure a five-year supply of deliverable housing land upon adoption. The scale of the assessed deficit and the weaknesses in the supporting trajectory are fundamental to the plan's housing strategy. Until those matters are resolved through convincing delivery evidence and sufficient deliverable provision, the plan has not been shown to be sound in respect of housing land supply.

2.34. Further details of the Council's housing land supply and the source of the supply is contained within **Appendix 1** of this statement.

Appendix 1 – Housing Land Supply Report for Land at Failsworth Road, Woodhouses

Housing Land Supply for Land West of Failsworth Road, Woodhouses

On behalf of North Lumb Farm Limited.

Date: November 2026 | Pegasus Ref: P18-1012_R010v1_PL_MAN_MG

Author: MG

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1. Introduction

1.1. This report provides an assessment of housing supply within the administrative area of Oldham, with regards to land to the west of Failsworth Road, Oldham. It considers the deliverable five-year housing land supply position within the periods 2025 to 2030 and 2026 to 2031.

1.2. The following report provides an analysis of the council's latest evidence upon housing land supply which was provided in response to the initial questions of the Inspector of the Oldham Local Plan (exam ref: EL1.001a). Th response was provided in the form of a written response (exam ref: EL2.001a). Appendix 2 of this written response provided an update to the trajectory found within appendix 1 of the Housing Topic Paper (exam ref: EL2.001c) (hereafter known as the 2026 Housing Trajectory). The following analysis focusses solely upon five-year housing supply and delivery and the information contained within the 2026 Housing Trajectory. It considers if the 2026 Housing Trajectory provides robust evidence in relation to housing supply, if it conforms with the NPPF in respect of housing delivery and supply and if a credible five-year housing land supply can be demonstrated using either 2025 or 2026 as the base date. However, the following analysis also refers to the Housing Topic Paper and 2025 Strategic Housing Land Availability Assessment (2025 SHLAA) (exam ref: HO3) as necessary.

1.3. Whilst the council has provided this evidence to the Inspector of the local plan it is yet to formally publish an update five-year housing land supply position. The currently published five-year supply position has a base date of 1st April 2025.

1.4. It is understood that due to the transitional arrangements for local plans, set out within Annex 1 of August 2026 NPPF the Oldham Local Plan will be assessed against a previous iteration of the NPPF. Nevertheless, for pragmatic purposes and to ensure that the plan is not out of date upon adoption the plan and the examination should be cognisant of the August 2026 NPPF.

2. Policy Context

2.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that planning applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The Local Plan

2.2. The statutory Development Plan comprises the following adopted documents:

- Oldham Local Development Framework Development Plan Document - Joint Core Strategy and Development Management Policies (Adopted 9th November 2011) ("OCS")
- Places for Everyone ("PfE") adopted by nine Greater Manchester Authorities (including Oldham Council) in March 2024.

2.3. The PfE establishes the minimum housing requirement figures for each authority over the period 2022-2039. The Oldham Local Plan does not seek to update the housing requirement, nor does it seek to allocate additional housing sites. The council has taken the decision to simply rely on potential sites identified through the SHLAA (and the strategic housing allocations identified in the PfE to meet its housing needs over the Local Plan period).

2.4. It should be recognised that the 2025 SHLAA explicitly states (section 1) that the identification of sites in the SHLAA *"does not imply that planning permission would be granted on the site if an application were to be submitted.."* and that it *"…does not allocate sites for development. Sites are allocated for development in the Places for Everyone (PfE) Joint Development Plan (as adopted 21 March 2024)"*. The SHLAA therefore recognises it is simply a technical document which infers no planning status to a site. Should the council wish to infer planning status to sites in the 2025 SHLAA it should seek to allocate those sites.

National Policy and Guidance

National Planning Policy Framework

2.5. The most recent version of the NPPF was published on 17 August 2026 and became a material consideration for decision-making upon the day of its publication. This replaced the previous NPPF published in December 2024.

2.6. Chapter 4 of the August 2026 NPPF sets out national policy for achieving sustainable development. Policy S1 identifies that the purpose of the planning system is to contribute to the achievement of sustainable development, and Policy S2 explains that this is to be achieved through mutually supportive economic, social and environmental objectives, including meeting housing needs.

2.7. Policy S3 of the August 2026 NPPF states that decisions should apply a presumption in favour of sustainable development. For decision-making, the presumption is then applied through Policy S4 for development within settlements and Policy S5 for development outside settlements, unless the following criteria apply.

i. the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

2.8. Policy S4 provides that development within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects when assessed against the policies in the Framework taken as a whole. Policy S5 identifies the categories of development outside settlements which should be approved, subject to the same substantially outweighed test, including development that would address evidenced unmet need and qualifying residential or mixed-use development within reasonable walking distance of a well-connected station.

2.9. Chapter 2 contains the plan-making policies. Policy PM1 requires plans and policies to be positively prepared, justified, effective and consistent with national policy, with evidence that is relevant, proportionate and up to date.

2.10. Chapter 6 of the August 2026 NPPF, 'Delivering a sufficient supply of homes', continues to set out the Government's objective of significantly boosting the supply of homes. Policy HO1 requires plan-making and decision-making to support the delivery of a sufficient amount and variety of land for homes where they are needed.

2.11. Annex D of the August 2026 NPPF sets out the national policy for assessing housing need and housing land supply. It requires local planning authorities to identify and update annually a supply of specific 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 unless they have been reviewed and found not to require updating.

2.12. Annex D also requires the five-years' worth of housing to include the appropriate buffer, which is either 5% or 20% depending on the applicable circumstances, including the Housing Delivery Test and the additional buffer provisions introduced for certain recently adopted plans.

2.13. Annex B: Glossary of the August 2026 NPPF confirms that, to be considered deliverable:

*"…sites for housing should **be available now**, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

*b) **where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is***

identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years." (our emphasis)

2.14. This definition of deliverable supersedes earlier versions of the NPPF and was effective upon publication of the August 2026 Framework. The following assessment of the deliverable supply within Oldham is therefore undertaken against the definition in Annex B, read together with Annex D. Whilst the Oldham Local Plan is being examined against an older version of the NPPF the definition of a deliverable site remains unchanged.

National Planning Practice Guidance

2.15. First published in March 2014, the National Planning Practice Guidance (PPG) supplements the NPPF in that it provides guidance upon the application of national planning policy. The PPG is a material consideration in the development of plans and the determination of planning applications and appeals.

2.16. Section 68 of the PPG deals with housing supply and delivery. It identifies that the purpose of the five-year housing land supply is to provide an indication of whether there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next five-years. Where strategic policies are more than five years old or have been reviewed and found in need of updating, local housing need calculated using the standard method should be used in place of the housing requirement. (ID: 68-003-20190722).

2.17. The PPG provides clear guidance as to what constitutes a 'deliverable' housing site and requires clear evidence for major sites without detailed permission to be included within the assessment (ID: 68-007-20190722). This places far greater emphasis upon the council to provide robust evidence regarding housing delivery from such sources.

2.18. The PPG (ID 68-007-20190722) provides guidance upon what may constitute clear evidence, this includes:

- current planning status – including progress towards approved reserved matters or a planning performance agreement setting timescales for approval of reserved matters and discharge of conditions,
- firm progress towards submission of an application – such as written agreement between the local planning authority and site developer in relation to anticipated start and build-out rates,
- firm progress with site assessment work, and
- clear information relating to viability, ownership constraints or infrastructure provision – such as successful participation in bids for large-scale infrastructure.

3. Housing Requirement

3.1. As set out in Section 2, the relevant housing requirement is that contained within PfE. This is a stepped requirement which increases over time. The plan period requirement (2022-2039) is set out within Policy JP-H1 of the PfE which establishes an average requirement of 680 dwellings per annum (dpa) over the plan period (2022-2039). However, this is via a series of stepped requirements, as set out below:

- 404 homes per year (2022–2025)
- 680 homes per year (2025–2030)
- 772 homes per year (2030–2039)

3.2. It should be noted that this is significantly below the current standard method for determining local housing need (LHN). The current LHN identifies a minimum need of 972dpa for Oldham. Oldham's PfE housing requirement is only 70% of the current LHN, meaning circa 30% of the housing needs of the area are not being met in Oldham.

3.3. The following table highlights the implications of the PfE stepped requirement in terms of the base five-year supply requirement. As demonstrated the five-year housing land supply will get progressively more difficult for Oldham to achieve in each year until 2030/31. However, following the fifth anniversary of the adoption of the PfE in March 2029 the five-year supply will be assessed against the relevant LHN figure, this is currently 972 dwellings per annum. At this point, presuming the PfE is not updated earlier, the future base five-year supply requirement will be **4,860 dwellings** based upon the current LHN calculation.

Table 3.1: Future five-year housing land supply requirements

Base year	Requirement
2025/26	3,400
2026/27	3,492
2027/28	3,584
2028/29	3,676
2029/30	3,768
2030/31	3,860

Under/Over-supply

3.4. Delivery against the stepped PfE targets to date are set out within table 3.2 below.

Table 3.1 Housing Delivery (Plan period)

Year	Requirement	Dwellings
2022/23	404	403

2023/24	404	420
2024/25	404	578
2025/26	680	456
Total	**1,894**	**1,857**

Source: AMR/council response to Inspectors questions

3.5. The council has delivered 37 dwellings less than the PfE housing requirement, based upon the stepped trajectory. In terms of five-year housing land supply the PPG is clear on how under-supply should be dealt with stating:

"The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal."

3.6. It should be recognsied that whilst the PfE is a joint plan policy JP-H1 identifies that each local planning authority will need to identify and update annually a supply of specific deliverable sites against the minimum delivery rates for the district, irrespective of any shortfalls or surpluses in other districts and in the plan area overall. Therefore, Oldham cannot rely upon other PfE authorities to make-up this shortfall.

3.7. Further the PfE Inspectors required any shortfalls to be met within the next five years (para 788). The 37dwelling shortfall is therefore required to be applied to the current five-year supply. Furthermore, it is notable that the authority has only met its housing requirement in two of the four PfE plan period years and on no date has it met the average PfE requirement of 680 dwellings. The closest to date was in 2024/25 when delivery of 578 dwellings was accomplished. This deficit against a reduced housing requirement target is a concern given the increasing five-year supply delivery requirements going forward and is likely to get larger.

Buffer

3.8. Paragraph 9 of Annex D to the 2026 NPPF requires a buffer to be applied to the five-year housing land supply requirement. The scale of the buffer is determined by the most recent Housing Delivery Test (HDT) result. This is consistent with paragraph 74 of the 2021 NPPF. The most recent HDT results are the 2023 results which were published in August 2026. Oldham's delivery over the preceding 3-years measured 115% against its requirement over the same period, resulting in a requirement for a 5% buffer to be added.

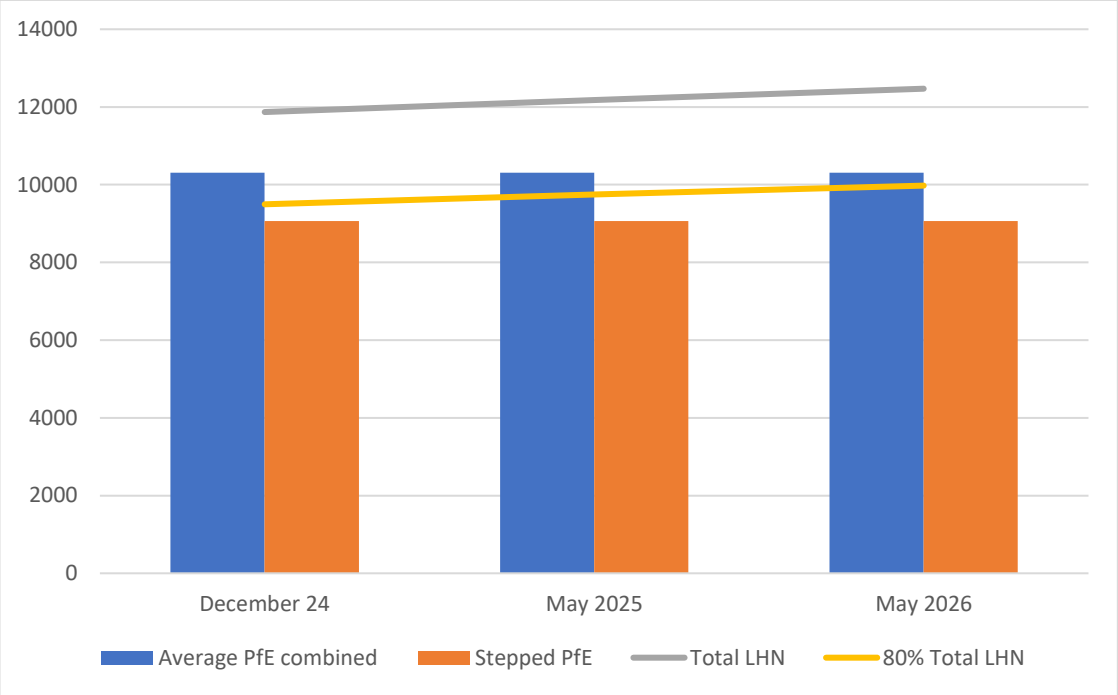
3.9. However, paragraph 9(c) of Annex D to the 2026 NPPF identifies that:

"For the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of the Framework published prior to December 2024, and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance."

3.10. Given, Oldham's PFE housing requirement is only 70% of the new Standard Methodology, if this is considered in isolation, it would trigger the 20% requirement. However, footnote 76 of the NPPF does identify that for joint local plans, the percentage should be applied in aggregate across the joint local plan area. In this instance the PfE requirement is currently 83% and as such a 5% buffer is required.

3.11. It must, however, be recognised that this is a marginal position and any increase in the LHN calculation across the PfE authorities would lead to a 20% buffer being applied. Figure 3.1 below demonstrates that the PfE combined requirement only exceeds the 80% LHN figure based upon the average requirement over the plan period. However, since the introduction of the updated LHN calculation in December 2024 the difference between the combined average and the combined LHN calculation has decreased by circa 2% each year from 86.8% in December 2024 to just 82.6% in May 2026. It is, therefore, likely that a 20% buffer will be required in Oldham within the next 6 to 18 months.

Figure 3.1: PfE combined housing requirement compared to combined PfE authorities LHN



Requirement

3.12. Based upon our analysis above the five-year housing land supply requirement on 1st April 2025 and 1st April 2026, is set out in table 3.2 below.

Table 3.2: Five-year housing land requirement

Element	1st April 2025	1st April 2026
1. Plan requirement	680*5	680*4 + 772
2. Under-supply	0	37
3. 5% buffer	170	176

4. **Five-year requirement (step 1+2+3)**	**3,570**	**3,705**

3.13. This requirement will only increase in future years and is likely to see a significant step-change in 2027 or 2028 once the 20% buffer is required.

4. Deliverable Supply

4.1. This section considers the deliverable supply, as set out within the 2026 Housing Trajectory. This trajectory has been provided in response to several questions posed by the examining Inspectors regarding the robustness of the council's approach to not identifying any allocations and the potential quantum of housing on deliverable and developable sites.

Over-arching issues

4.2. Within its response to the Inspectors' questions the council identifies four caveats in relation to the supply identified in the trajectory. These serve to confuse matters rather than providing any clarity or certainty upon the deliverable supply. In summary the four caveats are set out below:

i. The trajectory is based upon the housing land supply position on 1 April 2025 and does not represent a full update for 2026;

ii. Housing land supply is changeable and as such the information provided is the best available at the time of publication;

iii. Whilst the update provides site status on 1st April 2026, later updates are also included; and

iv. Since 1st April 2025, 54 additional sites have gained planning permission which were previously unknown. These account for 222 homes. A further 14 sites gained permission and are now under construction for a total of 39 dwellings.

4.3. In reference to point i, whilst an update in site progress since 1st April 2025 may be useful context it does little to identify whether the council can justifiably demonstrate a five-year supply of deliverable housing sites, either now or upon adoption.

4.4. The demonstration of a five-year supply is necessarily a point in time assessment which should be based upon the evidence available at that point in time. Sites which latterly can be identified as deliverable cannot be simply added to the supply at a later stage, to do so would create an inequitable assessment of the actual housing land supply position. This long-standing fundamental aspect of five-year housing land supply assessments was succinctly and eloquently provided by the Inspectors recommendations to the Secretary of State (paragraph 326) in the recovered Farleigh Fields appeal decision (3153935) which states inter alia:

> *"It is common ground that it is appropriate to assess supply for the five year period starting from 1 April 2016, however NSC includes sites in its anticipated supply that have been consented since that base date. As the appellant identifies, there is a significant body of appeal decisions in which Inspectors have indicated that such an approach is not appropriate in the absence of proper accounting. I share those Inspectors' broad view that if such sites are to be included then account must also be taken of the housing requirement that has accrued during the same period. NSC has not factored in that increased requirement or the increased backlog accrued after 1 April 2016, such that there is an imbalance in its inputs and a consequential artificial inflation of its supply of housing land over the five year period in relative terms. Accordingly, all of those sites, which amount to 328 dwellings, should be omitted for the purposes of this exercise."*

4.5. The Secretary of State agreed in paragraph 18 of the appeal decision that:

> "…For the reasons set out by the Inspector at IR325-327, he concludes that 328 units should be removed from supply, reducing the subtotal further to 7,885 (IR326)."

4.6. Point ii is correct. However, it is unclear why the council has failed to update its five-year housing land supply position given the evidence it is attempting to present to the Inspector. The evidence within the 2026 Housing Trajectory is purportedly based upon known site status on 1st April 2026. Given that the response to the Inspectors questions also identifies delivery to this base date the council should have all the necessary information to update its five-year housing land supply assessment to 1st April 2026.

4.7. With relation to point iii, as discussed above a clear base date needs to be set to determine the five-year supply. Without such a base date the assessment cannot be considered equitable as it does not provide a balanced picture of both supply and completions. However, the remainder of this report provides an assessment on the base date of 1st April 2025 and 1st April 2026 as the ingredients to undertake such an assessment are available.

4.8. In relation to point iv, to include these sites within the five-year supply they would need to meet the deliverability test set out within the NPPF annex at the base date of the relevant assessment, clearly, they do not meet this on 1st April 2025. However, this assessment does consider these dwellings within the next section.

4.9. Even more fundamental than the issues with the caveats are the clear inaccuracies within the 2026 Housing Trajectory completions data. In the monitoring year 2025/26 it identifies a total of 750 dwellings completed dwellings. However, table 2 of the council's response to the Inspectors questions suggests that just 456 completions in that monitoring year. This is a discrepancy of 284 dwellings representing just 61% of the claimed supply. If these inaccuracies were followed throughout the five-year period 2025-2030 the actual completions over this period would be just **2,772 dwellings or just 3.88-years supply**.

4.10. Indeed, it should be noted that none of the annual completions totals within the 2026 Housing Trajectory accord with those in table 2. Albeit most are lower. It is acknowledged that discrepancies in the years prior to 2025/26 could, potentially, be explained by some sites completing prior to the 1st April 2025 and therefore, legitimately, no longer being included within the trajectory. However, this cannot be true for the additional dwellings identified as completions within the trajectory in 2025/26, as the 2026 Housing Trajectory formed an update to the 2025 assessment and as such this should have been considered. Once again, we consider these 'missing' completions later in this assessment.

4.11. The 2026 Housing Trajectory is, therefore, at best an incomplete assessment. It provides little additional clarity either upon the five-year supply situation or the plan period supply. This goes to the heart of soundness of the plan. Without a demonstrable five-year supply upon adoption the plan cannot be considered positively prepared, justified, effective or consistent with national policy as it will effectively be out of date upon adoption.

Supply Evidence – General Issues

4.12. The council's housing supply is detailed in the Strategic Housing Land Availability Assessment (SHLAA, 2025), further explained in the council's Housing Topic Paper (January 2026) and updated by the 2026 Housing Trajectory.

4.13. The updated information within the 2026 Housing Trajectory provides a commentary upon the deliverability of sites within the trajectory. This is based upon the position on 1st April 2026. However, this commentary is extremely limited in detail. It provides little detail to determine when and if a detailed application will be brought forward and delivery commence on site. It provides no guarantees either from the developer or the council. Indeed, comments such as the trajectory being based upon 'indicative phasing' (see ref: SHA2000) are common. Suggesting the council's deliverability evidence is little more than assertion.

4.14. In relation to the NPPF definition (both 2021 and 2026) they identify that sites "*…should be available now, offer a suitable location for development now…*". Those with a detailed permission, outline permission, permission in principle or benefit from an allocation or being included on a brownfield register can, in most instances, be considered to fulfil this initial requirement. However, much of the council's supply is reliant upon SHLAA sites. As discussed in paragraph 2.4 above the SHLAA recognises it is simply a technical document which infers no planning status to a site. Should the council wish to infer planning status to sites in the 2025 SHLAA it should seek to allocate those sites. The suitability of many sites in the supply is, therefore, unknown as they are simply SHLAA sites with no planning status and therefore fail this initial deliverability test set by the NPPF definition. Further Part B of the NPPF definition of a deliverable site identifies categories of sites which could be considered deliverable with clear evidence, this does not include SHLAA sites.

4.15. For those sites which do fall within the Part B sites categories the Secretary of State (SoS) provided useful guidance in a recovered appeal on land off Audlem Road/Broad Lane, Stapeley, Nantwich (APP/RO660/A/13/2197532 & APP/RO660/A/13/2197529) on what constitutes clear evidence. Within paragraph 21 of this decision the SoS considers that:

"…the following should be removed from the supply: sites with outline planning permission which had no reserved matters applications and no evidence of a written agreement; a site where there is no application and the written agreement indicates an application submission date of August 2019 which has not been forthcoming, with no other evidence of progress; and a site where the agent in control of the site disputes deliverability…"

4.16. Numerous Inspectors have also grappled with the issue of what constitutes clear evidence for part B sites. In the case of Land at Caddywell Lane/Burwood Lane, Great Torrington, Devon (APP/W1145/W/19/3238460) this was eloquently expressed by the Inspector Harold Stephens who noted (paragraph 56 and 57):

"This indicates the expectation that `clear evidence' must be something cogent, as opposed to simply mere assertions. There must be strong evidence that a given site will in reality deliver housing in the timescale and in the numbers contended by the party concerned.

Clear evidence requires more than just being informed by landowners, agents or developers that sites will come forward, rather, that a realistic assessment of the factors concerning the delivery has been considered. This means not only are the planning matters that need to be considered but also the technical, legal and commercial/financial aspects of delivery assessed.

Securing an email or completed pro-forma from a developer or agent does not in itself constitute `clear evidence'. Developers are financially incentivised to reduce competition (supply) and this can be achieved by optimistically forecasting delivery of housing from their own site and consequentially remove the need for other sites to come forward."

4.17. It is notable that in Oldham's case the council does not even go as far as emails or written pro-formas and as such should be considered as no more than mere assertion.

4.18. In the appeal decision on land south of Hamstreet Road, Hamstreet (APP/E2205/W/25/3360094) the Inspector found that:

- allocated sites without a planning application are not deliverable (para 48, 49)
- allocated site with a pending full application which was subject to objections from statutory consultees was not deliverable (para 50).
- Sites with resolution to grant outline permission were not deliverable (paras 52, 53, 54).
- Site with outline permission but without a Reserved Matters application was not deliverable (para 56).

4.19. These appeal decisions and many others reinforce that evidence of deliverability must be cogent and site-specific, rather than relying on general assertions, ownership intentions, undetermined applications or unevidenced assumptions about delivery.

Sources of Supply

The SHLAA, Table 1, identifies a supply of 4,544 dwellings over the period 2025-2030. The various sources of supply which make up this position is replicated in Table 4.1 below.

Table 4.1: Sources of supply 2025-2030

Source	Dwellings
Sites under construction	1,800
Sites with extant planning permission	765
Saved UDP Phase 1 and Phase 2 allocations	4
Lapsed and stalled sites	10
Potential and pending sites	1,439
PfE Strategic allocations	546
Clearance allowance	-20
Total	**4,544**

Source: SHLAA

4.20. This is updated by the 2026 Housing Trajectory, however, the claimed deliverable supply for the period 2025-2030 remains unchanged. For the period 2026-2031 the 2026 Housing Trajectory suggests a deliverable supply of 5,030 dwellings. Whilst the categories do not quite match those in the 2025 SHLAA table 4.2 below provides a summary of delivery by each source of supply. It is recognised that table 4.2 does not include the sites the council identify within point iv above and contains the issues with the inaccuracies relating to delivery in 2025/26. These issues are considered further in section 5 of this report. The

remainder of this chapter provides a brief review of each of these sources of supply, including the updates provided by the 2026 Housing Trajectory. This review is undertaken in accordance with the NPPF and PPG and the appeals noted above.

Table 4.2: Sources of Supply 2025/26 to 2030/31 (2026 Housing Trajectory)

Sources	25/26	26/27	27/28	28/29	29/30	30/31	2025-2030	2026-2031
Completed	64	61	21	0	0	0	146	82
Under construction	667	475	436	442	90	72	2110	1515
Extant PP	5	118	267	184	487	579	1061	1635
Lapsed / No longer deliverable	0	0	0	0	0	2	0	2
Pending	0	0	14	44	44	38	102	140
Potential (unpermissioned)	0	32	75	238	220	243	565	808
PfE Strategic Allocations	12	15	80	229	237	302	573	863
Other	2	2	2	1	0	0	7	5
Clearance Allowance	-	-	-	-	-	-	-20	-20
Total	750	703	895	1138	1078	1236	4544	5030

Source: 2026 Housing Trajectory

4.21. Based upon the evidence provided by the council and our own analysis we do not consider that the 2026 Housing Trajectory provides a robust assessment of the five-year supply either at a base date of 1st April 2025 or 1st April 2026. Our reasons for these conclusions are set out against the varying sources of supply set out in table 4.2 above.

Completed

4.22. This is a new category which was not included in the 2025 SHLAA. The 2026 Housing Trajectory identifies 142 dwellings fall within this category for the period 2025-2030 and 82 dwellings for the period 2026-2031. Whilst we have no reason to suggest that these sites aren't complete it is notable that the council's comments indicate that all but one site was completed before the end of the monitoring year 2025/26. It is, however, unclear exactly when these sites completed and if, indeed they completed in 2025/26. The exception is Foxdenton Strategic Site, Broadway / Foxdenton Lane, Chadderton. This site is identified as being completed in July 2026. However, no completions are identified in the trajectory post 2025/26.

4.23. Given that these sites completed prior to the end of 2025/26 it is unclear how the trajectory continues to suggest delivery in 2026/27 and 2027/28. This relates to a total of **82 dwellings**. These dwellings should be removed from the 2026 to 2031 period to avoid double counting.

Under construction

4.24. This accounts for a total of 2,110 dwellings in the 2025-2030 period an increase of 310 dwellings compared to the 2025 SHLAA and 1,515 dwellings in the 2026-2031 period. Whilst we do not dispute many of these sites, we do raise issue with the following:

Shaw Distribution Centre (Ref: HLA3981)

4.25. This site received outline planning permission for up to 400 dwellings (OUT/345898/20). Various applications have been approved since including those that allowed for a phased delivery of the site.

4.26. Within the council's 2026 Housing Trajectory, 11 dwellings are stated to have been completed in the first year at 2024/25. The council then assume that 66 dwellings will be delivered on the site for each year between 2025-2030, followed by 59 dwellings in 2030/31 (which tallies up to 400 dwellings).

4.27. Phase 1 of the site has commenced under the Reserved Matters Application for that phase (RES/350957/23). This relates to the northern part of the site where **130 dwellings** have been consented through the RM / detailed application process.

4.28. Phase 2 has yet to start but Pegasus Group submitted the Reserved Matters (RM) application in November 2024 on behalf of Bellway and this was granted in February 2025 (RES/353501/24). The density of development Phase 2 is far less than originally envisaged at the outline stage, with only **192 dwellings** consented through the RM process. The total capacity of the site therefore amounts to **322 dwellings** and not the 400 allowed for through the outline application. As such, noting the 11 dwellings that the Council have cited as being completed in 2024/25, this leaves 311 to be delivered.

4.29. Since then, Pegasus Group have submitted a discharge of condition application to address the pre-commencement conditions in December 2025 (CND/354027/25). That DOC application has yet to be determined as of 11th November 2026, but we anticipate there will be scope for a seamlessly transition from Phase 1 to Phase 2 in terms of the construction process.

4.30. A Non-Material Amendment Application (ref: NMA/356901/26) was also submitted by Pegasus in September 2026, which increases the Phase 2 scheme by a further 8 units (so 200 in total). That application remains undetermined and its submission is clearly post the base date of the 2025-2030 assessment SHLAA and the 2026-2031 assessment. If approved, this will take the total site capacity up to **340 dwellings**, which is still significantly less than the 'up to 400' units approved under the original outline consent.

4.31. On the basis that the site is being delivered by a single housebuilder (and notwithstanding the fact that Great Places will take on the affordable housing provision), recent sales data obtained from Bellway, and the fact that Table 4 in the 2025 SHLAA confirms that the average build out rate for sites over 100 dwellings is 49 per annum, we have assumed a rounded 50 dwellings per annum is the maximum that would be delivered each year. We therefore reduce the five year supply from this site by **80 dwellings from 330 to 250 in the period 2025-2030** and **73 dwellings from 323 to 250 in the period 2025-2030.**

Land between Princess St / Mumps Metrolink Stop (Ref: SHA0021)

4.32. This is a former SHLAA site but was not a local plan allocation. Whilst the site now benefits from extant planning permission for a total of 331 homes (FUL/354326/25) this was not validated until 9th April 2025 or approved until 3rd July 2025 and hence did not have any planning status prior to the decision date and as such should not be considered deliverable in the 2025-2030 period. **All 331 dwellings are removed from this period**.

4.33. In terms of the 2026-2031 period, it is agreed these dwellings can be included in the supply.

Conclusions

4.34. The net effect of the above amendments to the 2026 Housing Trajectory is the reduction by 411 dwellings over the period 2025-2030 and 73 dwellings in the period 2026-2031.

Extant Planning Permission

4.35. These sites account for 1,061 dwellings in the period 2025-2030 and 1,635 dwellings in the period 2026-2031.

4.36. Most of these sites are not disputed. However, we do dispute the inclusion of dwellings from the following sites:

- Land at North Werneth Zone 6 (Hartford Mill, Edward Street) (HLA2663) – whilst this site benefits from an approved outline (OUT/353664/24) no further progress has been made since its approval. This scheme is identified to deliver 70 dwellings in the period 2026-2031, with none in 2025-2030. The council note that progress is being made but provide no specific detail. Based upon the lack of clear evidence 70 dwellings are removed from the period 2026-2031.

- 53 - 55 King Street (formerly Riley Snooker Club and Megson and Ponsonby Solicitors), Oldham (HLA2831) – this site benefits from a pending permission (FUL/353585/24). The permission was granted subject to a S106 on 11th November 2025. However, the S106 remains unsigned more than a year later. There is, therefore, clear uncertainty when or if this will be signed. On this basis the 49 dwellings anticipated to be delivered in the 2026-2031 period should be discounted.

- Former Leisure Centre (SHA1759) - council owned site that is subject to an outline planning application with all matters reserved (OUT/354324/25), which was submitted by Muse Places Limited and registered by the Council on the 9th April 2025. It was approved at the 2nd July 2025 planning committee and the decision notice was issued on 3rd July 2025. Condition 1 of the permission confirms that RM applications must be submitted within 15 years from the date of the permission and development must commence within 3 years from the RM decision. No RM applications have been submitted for the site. As such, it does not meet the definition of a deliverable site in line with the NPPF and PPG and we have therefore removed 120 dwellings from the 2025-2030 period and 231 dwellings from the 2026-2031 period. It should be noted that the council's evidence of deliverability indicates that the phasing is 'indicative' and as such is mere assertion.

- Former Magistrates Court and Manchester Chambers Barn Street (SHA2001) -council owned site that is subject to an outline application with all matters reserved (OUT/354323/25), which was submitted by Muse Places Limited and validated by the Council on 9th April 2025. It was also approved at the 2nd July 2025 planning committee and the decision notice was issued on 3rd July 2025. Condition 1 of the permission also confirms that RM applications must be submitted within 15 years from the date of the permission and development must commence within 3 years from the RM decision. No RM applications have been submitted for the site. As such, it does not meet the definition of a deliverable site in line with the NPPF and PPG and we have therefore removed 99 dwellings from the from the 2025-2030 period and 219 dwellings from the 2026-2031 period. Once again, the deliverability evidence suggests the phasing is 'indicative'.

- Land at South Link (SHA2016) - public owned site (Transport for Greater Manchester). The land once formed part of the Oldham Rail Loop located to the south of Oldham Way and north of the Southway Business Park. It is subject to a live planning application (FUL/355201/25) submitted by Vistry Group for 147 dwellings and a mix of houses and apartments. The application was submitted on 8th October

2025 and validated on 10th October and therefore after the base date of the 2025-2030 period. The council suggests delivery will commence in January 2027. However, the application remains undetermined as additional plans and report have been issued to the Council as late as 17th September 2026. Coupled with the fact that the site is not allocated and there are evident technical matters that still need to be resolved in relation to the live planning application, the site is not deemed to meet the definition of a deliverable site and we have therefore removed 147 dwellings from the period 2025-2030 and 2026-2031.

- Civic Centre, West Street (SHA2000)- council owned site that is subject to a hybrid planning application for 838 dwellings (OUT/354338/25), which was submitted by Muse Places Limited on 2nd April 2025, validated on 9th April 2025 and determined on 3rd July 2025. The outline permission relates to most of the site is subject to a planning condition that requires the RM applications to be made no later than 15 years from the date of the decision notice. No RM applications have been submitted. The full permission includes provision for the demolition of the existing buildings and the creation of a residential Block A, which comprises of 93 apartments, and requires commencement to start within 3 years of the decision notice being issued. It is this component that relates to the number of dwellings the Council has accounted for in the period 2025-2030. A further 154 dwellings are anticipated to deliver in 2030/31 however no detailed permissions exist for these dwellings. The site is not an allocation and was granted planning permission after the base date of the 2025-2030 period, and as such the 93 dwellings should be removed this period but can be included in the 2026-2031 period. However, the additional 147 dwellings are subject to 'indicative' phasing as such no clear evidence is provided. 147 dwellings are removed from the 2026-2031 period.
- South Chadderton School, Butterworth Lane, Chadderton (SHA0976) – the site contains areas of demolished buildings and hard surfaced playing pitches. It is not an allocated site. The site is subject to a pending application for 149 dwellings submitted by Rowland Homes and was granted on 21st April 2026. This is after the base date for both the 2025 and 2026 assessments. Given the lack of planning status prior to this decision all 149 dwellings are removed from the supply.

4.37. The foregoing analysis is summarised in table 4.3 below. Our analysis removes **608 dwellings from the 2025-2030** period and **1,009 dwellings from the 2026-2031** period.

Table 4.3: Disputed Extant Planning Permission Sites

Site	Oldham		Pegasus	
	2025-2030	2026-2031	2025-2030	2026-2031
Land at North Werneth Zone 6	0	70	0	0
53 - 55 King Street	0	49	0	0
Former Leisure Centre	120	221	0	0
Former Magistrates Court and Manchester Chambers	99	219	0	0
Land at South Link	147	147	0	0

Civic Centre	93	247	0	93
South Chadderton School	149	149	0	0
Total	608	1,102	0	93

Lapsed / No longer deliverable

4.38. The 2026 Housing Trajectory identifies that this category applies to just one site, Land off Mark St., West End St, Oldham for 5 dwellings, two dwellings are identified in the 2026-2031 period. The council identifies this site is no longer suitable and as such **2 dwellings are removed from the 2026-2031 period**.

Pending Sites

4.39. This source of supply relates to 102 dwellings in the 2025 to 2030 period and 140 dwellings in the 2026 to 2031 period and relates to three sites. These are:

- The Hollies, Wellington Rd, Oldham – 27 dwellings in 2026 to 2031 period
- Ivy Mill, Failsworth – 102 dwellings in both 2025 to 2030 and 2026 to 2031 periods
- Lilac View Close, Crompton – 11 dwellings in the 2026 to 2031 period.

4.40. None of these sites benefit from any planning status at either base date and all remain pending. As such until approval is provided, they should not be deemed to offer a suitable location for development now, as this has not been fully assessed. This is consistent with the appeal and Secretary of State decisions discussed above.

4.41. Further in relation to Ivy Mill the council's officer recommended that the application be refused at the 17th July 2024 planning committee due to the lack of required developer contributions being offered and the lack of any evidence associated with viability. The committee resolved to defer the decision, and it was then re-considered at the 18th September 2024 planning committee, where the application was recommended for approval subject to conditions and the signing of a s106 agreement and significant financial contributions to open space provision in the area. Members of the planning committee endorsed the recommendation. However, the required legal agreement has not been finalised and this suggests the scheme is not viable with the additional developer contributions that are required.

4.42. Based upon the above assessment **all 102 dwellings should be removed from the period 2025 to 2030 and 140 dwellings from the period 2026 to 2031**.

Potential (Unpermissioned) Sites

4.43. A total of 565 dwellings are derived from 'Potential (unpermissioned) sites' in the period 2025 to 2030 and 808 dwellings in the period 2026 to 2031.

4.44. As discussed within paragraphs 2.4 and 4.14 above the NPPF and PPG clearly discuss what constitutes a deliverable site. None of these types of sites fit this definition. Whilst some of these sites are in council ownership or benefit from lapsed permissions this does not constitute a suitable location or clear evidence. The 2026 Housing Trajectory suggests that four sites benefit from an extant permission. However, upon further investigation these have all now expired.

4.45. The SHLAA refers to the Residential Development Strategy. A 2022 Cabinet report discussed this strategy and includes a disposal strategy. It also notes that the sites had been assessed by consultants Walker Sime, that a masterplan had been prepared, and that Homes England and other funding had been secured to support due diligence work. However, none of this work provides clear evidence of delivery within the five-year period. There is no indication of timescales for receiving a detailed consent, delivering infrastructure requirements, commencing on site or who will deliver the sites.

4.46. On the basis of the above all **565 dwellings from 2025 to 2030** and **808 dwellings from 2026 to 2031** should be removed.

PfE Strategic Allocations

4.47. A total of six PfE Strategic Allocations are identified to deliver in the periods 2025 to 2030 and 2026 to 2031. Delivering 573 and 863 dwellings respectively. All but two are disputed, those disputed are set out within table 4.4 below. Our assessment **removes 486 dwellings from the period 2025-2030, reducing it to 87 dwellings and 788 dwellings from 2026-2031, reducing it to 75 dwellings.**

Table 4.4: Disputed PfE Strategic Allocations

Site	Oldham		Pegasus	
	2025-2030	2026-2031	2025-2030	2026-2031
JPA10 Beal Valley	155	248	0	0
JPA12 Broadbent Moss	287	442	0	0
JPA13 Chew Brook Vale	44	80	0	0
JPA14 Cowlishaw	**0**	**18**	**0**	**0**
Total	486	788	0	0

JPA10 Beal Valley

4.48. This allocation adjoins JPA12 and both have recently been subject to a collective high level master planning process by the council in line with respective policy requirements set by the PfE. The masterplan was signed off by the Council's Cabinet in December 2025. The member's decision was that these sites now needed to be subject to the preparation of a SPD before planning applications are favourably considered on the sites (see officer report, addendum report, minutes and the masterplan at Appendix 1). The officer's addendum report confirm adoption of the SPD is not expected until September 2026 at the earliest and would be subject to further consultation. No draft SPD has yet to be issued and therefore despite some more recent progress on submitted planning applications on both sites, it is still unclear if the Council will ultimately support these planning applications further to the council's decision that an SPD would be required in the first instance.

4.49. JPA10 Beal Valley is allocated for 480 dwellings in the PFE (JPA10) The northern most tip of the allocation adjacent to the town centre and once controlled by P&D Northern Steels Ltd was never in the Green Belt and benefited from historic outline planning consents for 80 dwellings (which Pegasus Group were involved with on behalf of the landowner – ref PA/331731/11). That parcel has a more recent full permission for 65 dwellings (ref:

PA/344572/20) and is under construction by Mulbury Homes and Great Places Housing Group. This permission is already included within the Council's supply in that category (see site ref: HLA3028, where the remaining 56 homes were expected to be completed in 2025/26

4.50. Most of the remainder of the site was previously within the Green Belt and is principally in the control of Barratt Homes. Barratt Homes land is now subject to a full planning application for 192 dwellings (ref: FUL/356549/26), which was submitted in July 2026 and is still subject to determination (and therefore prior to either base date).

4.51. The remainder of JPA10 is effectively landlocked other than the existing Duke Mill Building towards Shaw Town Centre, which the council confirms is currently in active use and is unlikely to be brought forward prior to either five-year period (SHLAA Site Ref: SHA0905).

4.52. Pegasus have also previously promoted through the PfE process a parcel of land that remains in the control of P&D Pension Fund to the east of Longley Street and Sumner Street and south of Duke Mill. However, that parcel of land can only physically accommodate circa 40 units and does not currently benefit from a right of access from an adopted highway, hence no planning application submission is on the immediate horizon.

4.53. Notwithstanding Barratt Home's full planning demonstrates a willingness by the developer to bring the site forward given the position the Council took in December 2025 and the lack of an adopted SPD, it is not possible to conclude that this site meets the definition of a deliverable housing site.

4.54. Even if Barratt's full application was to be granted within a short period of time (post the monitoring period), it is not considered that 155 dwellings would be delivered over the remaining period up to 31st March 2030 and 247 over the period 2030/31. The council's trajectory assumes 92 dwellings will be built in 2028/29, 63 dwellings in 2029/30 and 93 dwellings in 2030/31. The Council's more immediate trajectory for the site is therefore above the amount of homes Barratt have applied for in full and we note Barratt's application utilises practically all of the remaining developable area within the allocation boundary (noting the significant topographical constraints across the site and the former landfill site, SBI and landlocked parcels of land in the northern part of the allocation site).

4.55. In short, the Beal Valley allocation is simply not going to deliver the 480 dwellings the Council have assumed in the PFE and the housing trajectory for this site, and we also consider they have double counted some of the future immediate and longer term supply by including the PD site recently constructed and the Duke Mill site as these parts of the allocation are also included in the sites under construction and potential sites within the 2026 Housing Trajectory.

4.56. Even in the event that it was deemed that the Barratt Home's parcel meets the definition of a deliverable site, we do not consider 155 dwellings would be delivered by 31st March 2030 as the proposal comprises of just one housebuilder and they are highly unlikely to complete 93 dwellings in the first year. Indeed, Table 4 in the 2025 SHLAA confirms that the average delivery rate for sites with 100+ homes is 49 dwellings per annum, which would deliver 98 dwellings over the 5 year monitoring period if we assumed completion of dwellings would start in 2028/29 as assumed in the Council's SHLAA trajectory.

4.57. However, we maintain our original position that all dwellings should be removed from both five-year periods on the basis that the full planning application by Barratt was lodged after the monitoring period and has yet to be approved and the lack of an adopted SPD. We also

note there are inconsistencies with it in terms of comparing it to the Draft SPD for the site and therefore there is no guarantee the Council will approve the application even if the SPD is adopted.

JPA12: Broadbent Moss

4.58. This site is allocated in the PFE for 1,450 dwellings and the policy confirms that its delivery is expected to go beyond the PFE plan period with 376 dwellings delivered post 2039.

4.59. Part of the allocation site was subject to the completion of 77 dwellings in 2021/22 (under planning application PA/343341/19) which falls on a small part of this allocation to the west of the railway line.

4.60. The remaining land within the allocation to the west of the railway line is subject to a full application by Grasscroft Homes and Property Limited (supported by Kellen Homes) (ref: FUL/355603/26) for up to 248 dwellings, which remains undetermined. It was submitted in January 2026 (and therefore after the base date of the 2025-2030 period) and we note additional technical documents were submitted to the Council in September 2026.

4.61. There are no live planning applications on the part of the allocation to the east of the railway line, where the majority of the allocation falls. That part of the site is comprised of a former landfill and is therefore likely to be subject to various technical constraints and high abnormal costs.

4.62. Within the 2026 Housing Trajectory the council have assumed additional completions will include 80 dwellings in 2027/28, 87 dwellings in 2028/29, 120 dwellings in 2029/30 and 155 dwellings in 2030/31 with further annual completions above 100 dwellings up to 2036/37, then dropping down to circa 60 dwellings thereafter with final completion in 2041/42.

4.63. Even if we were to assume that the Grasscroft site that forms part of the allocation met the definition of deliverable, this only amounts to 248 dwellings and not the 287 and 422 dwellings allowed for by the council within the periods 2025-2030 and 2026-2031.

4.64. However, we maintain that all dwellings should be removed on the basis that the full planning application has yet to be approved and the lack of an adopted SPD. We also note there are inconsistencies with it in terms of comparing it to the Draft SPD for the site and therefore there is no guarantee the Council will approve the application within a short order.

JPA13: Chew Brook Vale

4.65. This site is not subject to any live planning applications. The Policy confirms that the site needs to be subject to a comprehensive masterplan, design code and infrastructure delivery plan that requires sign off from the council. Whilst the 2026 Housing Trajectory suggests developer interest in the site, this is far removed from the clear evidence required to demonstrate it will deliver in the five-year period. As such, it is not considered to meet the definition of a deliverable site. We have therefore removed all dwellings from both 5-year periods.

JPA14: Cowlishaw

4.66. This site is identified to deliver 18 dwellings in 2030/31. There is no live planning application on the final phase of this site to which the 18 dwellings relate. The council identify that the "*landowner/ developer has recently engaged with the Council regarding this final phase of*

development on the allocation. A planning application is expected soon." There is, however, no clear evidence upon when or what type of application will be submitted. The 18 dwellings is, therefore, no more than mere assertion. As such, it is not considered to meet the definition of a deliverable site. We have therefore removed all dwellings from the 2026-2031 period.

Other Sites

4.67. This applies to just two sites and accounts for just 5 dwellings in the 2026-2031 period and 7 dwellings in the 2025-2030 period. The first site 906 Ashton Road Oldham (HLA4248) relates to just two dwellings in 2025/26. Whilst these dwellings are retained in the 2026 Housing Trajectory it notes that the previous application has been superseded and there are now no net additional dwellings from the site. Therefore 2 dwellings are required to be removed from the 2025-2030 supply.

4.68. The second site Linney Lane Motors Linney Lane Shaw Oldham (HLA4225) includes 5 dwellings over both periods. These entries duplicate dwellings at Shaw Distribution Centre, discussed above. All **5 dwellings should therefore be removed**.

Lapse Rate

4.69. We have not undertaken a detailed assessment of all sites set out within the council's supply that relate to extant planning permissions. However, as part of the council's response to the Local Plan inspector an average lapse rate of 11.8% on extant planning permissions has been presented (based on data collated over a 10-year period 2014/15 – 2023/24). If this lapse rate is applied to the non-disputed sites with extant planning permission for the period 2025-2030 (453 dwellings) and 2026-2031 (626 dwellings), this results in a further discount of **53 dwellings and 74 dwellings** respectively.

Summary

4.70. The following table identifies our assessment of the sources of supply, based upon the analysis and evidence provided above. This is compared to the council's assertions in relation to the sources of supply.

Table 4.5: Sources of supply comparison

Sources	Council		Pegasus	
	2025-2030	2026-2031	2025-2030	2026-2031
Completed	146	82	146	0
Under construction	2110	1515	1699	1442
Extant PP	1061	1635	453	626
Lapsed / No longer deliverable	0	2	0	0
Pending	102	140	0	0
Potential (unpermissioned)	565	808	0	0
PfE Strategic Allocations	573	863	87	75
Other	7	5	0	0
Clearance Allowance	-20	-20	-20	-20
Lapse Rate	0	0	-53	-74
Total	**4544**	**5030**	**2312**	**2049**

5. Five-year supply

5.1. Based upon the foregoing evidence provided within this report a five-year housing land supply cannot currently be demonstrated within the Oldham Council administrative area. Our analysis identifies a 3.24-year supply for the period 2025-2030, representing a deficit of 1,258 homes. Given the issues raised with the 2026 Housing Trajectory, discussed in section 4 above, this assessment represents the most robust assessment of housing land supply currently available.

Table 5.1: Five-year housing land supply 2025-2030

Element	Dwellings
1. Housing Requirement	3,400
2. Under-supply	0
3. 5% buffer	170
4. Five-year requirement (step 1+2+3)	3,570
5. Deliverable Supply	2,312
6. Year's supply	**3.24**

5.2. It is notable that the supply deteriorates slightly once the council's evidence in relation to the period 2026-2031 is taken into consideration. This suggests a supply of just 2.77-years, a deficit of 1,656 dwellings. Whilst the calculation of five-year housing land supply is not an exact science and the relative housing land position may change, dependent upon new evidence, the scale of the shortfall over both periods is significant. This clearly demonstrates that a significant improvement in housing delivery is required across the Oldham area.

Table 5.2: Five-year housing land supply 2026-2031

Element	Dwellings
1. Housing Requirement	3,492
2. Under-supply	37
3. 5% buffer	176
4. Five-year requirement (step 1+2+3)	3,705
5. Deliverable Supply	2,049
6. Year's supply	**2.77**

5.3. Table 5.2 does not take any account of the 261 dwellings which the 2026 council identify have gained permission since 1st April 2025, of which 39 are under construction, or the 284 'missing' dwellings from the completions data. Both elements are discussed in section 4

above. It is possible that both elements could provide dwellings for the five-year period 2026-2031.

5.4. Whilst it is currently unclear whether or not there is any evidence to suggest that any or part of these sources of supply would deliver in the five-year period table 5.3 provides a sensitivity tests of these 'sources' of supply. This suggests that the supply remains woeful and could range from 3.15 to 3.50-years at best. It is, therefore, notable that in the unlikely event that both sources can legitimately be included in full a five-year supply of deliverable sites cannot be demonstrated based upon the current evidence available to the Local Plan Inspectors.

Table 5.3 Five-year supply scenario testing

Element	Scenario 1 'missing' completions	Scenario 2 new permissions	Scenario 3 'missing' completions and new permissions
1. Housing Requirement	3,492		
2. Under-supply	37		
3. 5% buffer	176		
4. Five-year requirement	3,705		
5. Supply	2,333	2,310	2,594
6. Year's supply	**3.15**	**3.12**	**3.50**

6. Conclusions

6.1. This assessment concludes that Oldham cannot demonstrate a five-year supply of deliverable housing land at either of the base dates considered. The 2026 Housing Trajectory does not resolve the deficiencies in the council's evidence or establish that sufficient homes will be delivered within the relevant five-year periods. The resulting shortfall is substantial and has direct implications for the soundness of the emerging Local Plan.

6.2. As set out in Tables 5.1 and 5.2, the assessed deliverable supply is 2,312 dwellings for 2025–2030 against a requirement of 3,570 dwellings, equivalent to 3.24 years' supply and a shortfall of 1,258 dwellings. For 2026–2031, the assessed supply falls to 2,049 dwellings against a requirement of 3,705 dwellings, equivalent to 2.77 years' supply and a shortfall of 1,656 dwellings. These results demonstrate that the additional trajectory information does not establish an adequate supply when assessed against the relevant requirement and the evidence of deliverability.

6.3. The assessment identifies substantive concerns about the inclusion and timing of housing delivery, including the retention of completed dwellings in future supply, duplication, inconsistent completion figures, and assumptions about site capacities, lead-in times and build-out rates. For several sites, the evidence does not adequately explain how outstanding planning, technical, infrastructure or commercial matters will be resolved in time to achieve the completions claimed. General statements of progress and indicative phasing do not provide the site-specific evidence needed to substantiate those assumptions and provide the necessary clear evidence.

6.4. Reliance upon potential SHLAA sites and the PfE strategic allocations does not, on the evidence reviewed, overcome the shortfall. Identification of potential capacity is distinct from demonstrating that homes have a realistic prospect of delivery within five years and meet the NPPF definition of a deliverable site. The report identifies insufficient evidence to support significant contributions from these sources within the periods assessed.

6.5. The sensitivity testing in Table 5.3 separately considers the potential effect on the 2026–2031 supply of the 'missing' completions identified in the council's data and new planning permissions granted after 1 April 2025. Even if both elements were included in full, the reported supply at a base date of 1st April 2026 would increase to only 3.50 years, remaining substantially below five years. This is a sensitivity exercise rather than an acceptance of additional deliverable supply: the completion figures require reconciliation, and any contribution from the new permissions must be supported by evidence of deliverability at the relevant assessment base date.

6.6. These findings undermine the justification for an emerging Local Plan which does not allocate additional housing sites and instead relies upon the existing supply identified through the SHLAA and PfE. On the evidence presented, that approach has not been shown to secure sufficient deliverable housing land. The increasing stepped housing requirement identified in this report places further pressure on delivery. The plan's ability to address the identified deficit cannot therefore be established simply by retaining the council's existing trajectory assumptions.

6.7. In terms of soundness, the evidence reviewed does not demonstrate that the emerging plan is positively prepared to address the identified housing delivery shortfall. Its justification is undermined by inconsistencies in the supporting data and insufficient

evidence for key delivery assumptions. Its effectiveness has not been demonstrated because the trajectory relies upon completions which this assessment finds are not adequately substantiated within the relevant timescales. For the same reasons, the evidence does not demonstrate consistency with the national policy requirements for deliverable housing land set out earlier in this report. These concerns should be considered against the policy framework applicable to the examination, recognising the transitional arrangements identified in Section 1.

6.8. To address these deficiencies, the council needs to provide a coherent, up-to-date housing land supply assessment using a consistent base date, reconciled completion figures and robust site-specific delivery evidence. The trajectory must distinguish between longer-term development potential and genuinely deliverable supply, avoid double counting and reflect realistic capacities and delivery rates. Where the resulting supply remains insufficient, the plan should identify and secure additional deliverable housing opportunities, including through additional allocations, rather than rely upon unsupported assumptions about existing sites.

6.9. Overall, the evidence assessed in this report does not demonstrate that the emerging Local Plan can secure a five-year supply of deliverable housing land upon adoption. The scale of the assessed deficit, its persistence under the sensitivity testing and the weaknesses in the supporting trajectory are fundamental to the plan's housing strategy. Until those matters are resolved through convincing delivery evidence and sufficient deliverable provision, the plan has not been shown to be sound in respect of housing land supply.

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