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Places: Economy and Skills,  
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SENT BY EMAIL  
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08/12/2022

Dear Planning Policy Team,

## **WIGAN LOCAL PLAN: PLANNING FOR THE FUTURE TO 2040**

1. Thank you for consulting with the Home Builders Federation (HBF) on the scoping for the Wigan Local Plan.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The HBF would like to submit the following comments upon selected points raised by the online consultation. These responses are provided in order to assist Wigan Council in the preparation of the emerging local plan.

### **Plan Period**

4. The NPPF<sup>1</sup> states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery. The HBF considers that the Plan period to 2040 is unlikely to be appropriate and it is important that the Plan provides a 15-year period at the point at which the Plan is adopted and where larger scale developments, such as those included in the Places for Everyone document are proposed in the Plan, then a longer period may be required to take account of the timescale for their delivery.

### **Homes**

5. The HBF notes that the emerging Places for Everyone document proposes a housing requirement for Wigan of 15,554 dwellings in the period 2021-2037, with an annual average of 972 dwellings per annum (dpa) although it proposes this is stepped over the Plan period. When considering the level of housing land supply to meet the housing requirement the HBF recommends that the Council ensure that they give consideration to an appropriate level of flexibility within the supply to ensure that the Plan is robust and resilient to change.

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<sup>1</sup> NPPF 2021 Paragraph 22



6. The Council's housing land supply should include a short and long-term supply of sites with both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, with a range of sites by both size and market location. A wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice and competition in the land market.
7. The Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.
8. The HBF considers that it is appropriate for the Council to plan for the affordable needs of its community, and to ensure that it does this in line with the requirements in the NPPF as set out in paragraphs 34, 63-65.
9. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. The PPG<sup>2</sup> identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.
10. The Council should also note that the Government response to the Raising accessibility standards for new homes<sup>3</sup> states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.
11. The HBF considers that a policy which encourages self and custom-build development and sets out where it will be supported in principle would be appropriate. The HBF also considers that allocating sites specifically for self and custom-build home builders could also be appropriate, however, this would need to be done through discussion and negotiation with landowners. The HBF does not consider that requiring a proportion of large housing sites to be available for self-builders is appropriate.

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<sup>2</sup> ID: 56-007-20150327

<sup>3</sup> <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

## **Transport**

12. If the Council are looking to reduce travel by car, they should look to ensure that they have an appropriate balance between housing, employment and services. They should also look to support housing in sustainable locations, which can support active and sustainable travel.

## **Environment**

13. The HBF considers that climate change is not an issue that can just be addressed by one or two policies and is in fact a consideration that needs to be incorporated and considered throughout the Plan. This can include reducing the need to travel, creating a sustainable spatial strategy, providing active and sustainable travel options, providing opportunities for renewable and low carbon technology, providing multi-functional open spaces, along with considering the design and layout of developments.
14. The Council should also not seek to undermine the Government's intention to set energy efficiency standards through the Building Regulations via the 2021 Part L Interim Uplift (effective from June 2022) and the 2025 Future Homes Standard. The HBF considers that tackling climate change by promoting greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable, is the most appropriate way forward.
15. The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. Part S of the Building Regulations 'Infrastructure for the charging of electric vehicles' has now been published and took effect from 15th June 2022. This regulations document provides guidance on the installation and location of electric vehicle charge points (EVCPs). It states that a new residential building with associated parking must have access to EVCPs. It states that the total number of EVCPs must be equal to the number of parking spaces if there are fewer parking spaces than dwellings, or the equal to the number of dwellings where there are more parking spaces. The Regulations also set technical requirements for the charging points these include having a nominal output of 7kW and being fitted with a universal socket.

## **Future Engagement**

16. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
17. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,





**Joanne Harding**

**Planning Manager – Local Plan (North)**

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