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SENT BY EMAIL
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Dear Planning Policy Team,

ROCHDALE LOCAL PLAN 2024: REGULATION 18

1. Thank you for consulting with the Home Builders Federation (HBF) on the proposals to update the Rochdale Local Plan 2024 Regulation 18 consultation.
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 notes a consultation on the NPPF and the standard method for calculating housing need has commenced part way through the consultation on the Rochdale Local Plan, and that this is likely to have implications for the production of the Plan and the policies it contains.

Question 1. At this initial stage, to assist with preparation, the Council is seeking comments on the subject and scope of the Rochdale Local Plan. This could include what you think are the key issues and priorities for the borough and how we can address these through policies and designations.

Plan period

4. The NPPF¹ 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 Council may want to be looking to prepare a new Local Plan that will look forward to at least 2045 to ensure that it covers the 15-year period, they may also want to consider whether any strategic sites require the Council to plan over a longer period for these areas.

Housing

5. The HBF considers that one of the top areas of focus should be housing, it will be important that the Council focus of the provision of homes as part of the delivery of the overall plan for the area. This is likely to include ensuring sufficient provision to meet

¹ NPPF December 2023 Paragraph 22



local needs and to ensure a range and choice of provision across all parts of the housing market.

6. The Rochdale Integrated Assessment Scoping Report highlights key issues in relation to housing including the increase in population; the increase in the proportion of people aged over 65; the lack of housing of the right size, type, tenure and quality to meet identified needs; and issues of overcrowding. The HBF agrees that these are all issues that will need to be addressed.
7. Policy JP-H1 of the Places for Everyone (PfE) document an annual average of around 10,305 dwellings to be delivered across the Greater Manchester authorities included in the Plan. It states that the delivery rates identified in Table 7.2 are the minimum number of net additional dwellings each districted is expected to identify a sufficient supply of sites for, through their Local Plans. For Rochdale Table 7.2 identifies an annual average of 616 dwellings per annum (dpa), with a total of 10,472 dwellings over the Plan period. The HBF considers that the Council should plan for growth, this would be in line with the NPPF² which states that Plans should be prepared positively, in a way that is aspirational but deliverable.
8. The HBF notes that the Government are currently consulting on changes to the standard method and the calculation of housing need, and that the proposed new standard methodology would see the housing need for Rochdale increase to 1,031dpa. The HBF considers that this housing figure will need to be considered to reflect the latest government guidance in relation to the Written Ministerial Statement³, and the proposed standard methodology and NPPF.
9. The allocations within the PfE document highlight the need for larger homes, as the Council currently has a relatively small proportion of properties in Council Tax bands E and above. PfE suggests that the delivery of such housing will contribute to widening housing choice which will help to achieve the spatial objectives of boosting northern competitiveness. The HBF generally supports the provision of larger family homes and considers that the Council will need to consider an appropriate balance of development, to ensure that all of their housing needs are met in terms of types and tenures; locations and markets, and to ensure that the Plan can deliver against its housing requirements.
10. 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 NPPF⁴. This should ensure that any affordable housing requirements are clearly set out, are evidenced as viable through an assessment, and that flexibility is provided within the policy where viability may be an issue. The Council should also ensure that they have included an appropriate provision for both affordable home ownership and First Homes.

² NPPF 2023 Paragraph 16

³ Building the Homes we need – Written Ministerial Statement 30th July 2024

⁴ NPPF 2023 paragraphs 34, 63-66

11. The PPG⁵ states that the need to provide for older people is critical, and that offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. It goes on to state that Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people and that Plans need to provide for specialist housing for older people where a need exists⁶. It also notes that allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. As such, the HBF considers that the Council needs to work closely with the providers of older persons housing to identify appropriate sites or to provide appropriate policies.
12. Policy JP-H3 states that all new dwellings must comply with the nationally described space standards and be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations. The Council will need to take this into consideration when considering other policy requirements and in terms of any impact on viability of the development.

Making the best use of land

13. Policy JP-H4 states that new housing development should be delivered at a density appropriate to the location. It provides a table with minimum net residential densities by location and suggests that regard should be had to it. It states that lower densities may be acceptable where they can be clearly justified by local housing market issues and site-specific issues. The Council may want to consider if the densities set out in this policy are appropriate for Rochdale given the identified issues in terms of overcrowding and the lack of housing of the right size, type, tenure and quality to meet identified needs, which may mean that lower densities are more appropriate in the area.
14. The Council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency, street trees, parking provision and EV charging, and any implications of design coding will all impact upon the density which can be delivered upon a site.
15. Policy JP-S1 states that in preparing plans, the Council should make as much use as possible of suitable previously developed land (pdl) to meet development needs. The HBF considers that in line with the NPPF the Council should set out a clear strategy for accommodating their housing needs in a way that makes as much use as possible of PDL. However, this should not preclude the use of other sustainable sites, which are also likely to be required to ensure that the Council can meet its housing needs.

Connecting homes and places

16. Policy JP-C1 provides support for delivering a pattern of development that minimises both the need to travel and the distance travelled by unsustainable modes to jobs, housing and other key services. The HBF generally supports the principal of sustainable

⁵ PPG ID: 63-001-20190626

⁶ PPG ID: 63-006-20190626 & ID: 63-012-20190626

and active travel, however, the HBF would suggest that the Council take a flexible approach to how that is undertaken within housing developments.

Responding to the Climate Emergency

17. The Integrated Assessment Scoping Report highlights the need to reduce greenhouse gas emissions. Policy JP-S2 aims to deliver a carbon neutral Greater Manchester no later than 2038. It suggests that there will be an expectation that new development will, unless it can be demonstrated that it is not practicable or financially viable; be net zero carbon which applies from adoption to regulated operation carbon emissions; and from 2028 to all emissions 'in construction'.
18. The HBF considers that it is important that the Council does not set its own standards for development which may differ from the approach being taken by national Government, and that any such policy in relation to low carbon, local heat and energy solutions are implemented on a flexible basis, and that the Council recognise the decarbonisation of the national grid. This would be in line with the Written Ministerial Statement of December 2023⁷. The Council will also be aware that the Future Homes and Buildings Standards: 2023 consultation⁸ has been released covering Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating).
19. The HBF considers that it is appropriate for the Council to consider the location of future development and to give consideration to the possibility of development creating or contributing to the creation of sustainable locations, or supporting existing services and amenities to maintain a sustainable location.

Biodiversity Net Gain

20. BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a biodiversity net gain of 10%. In light of all the new guidance on Biodiversity Net Gain (BNG) that has recently been published, the Council will need to ensure its approach to BNG to ensure it fully reflects all the new legislation, national policy and guidance. The HBF notes that there is a lot of new information for the Council to work through and consider the implications of, in order to ensure that any policy on BNG policy so that it complies with the latest policy and guidance now this has been finalised. It is important that mandatory BNG does not frustrate or delay the delivery of much needed homes.
21. The PPG⁹ is clear that there is no need for individual Local Plans to repeat national BNG guidance. It is HBF's opinion that the Council should not deviate from the Government's requirement for 10% biodiversity net gain as set out in the Environment Act.
22. The HBF also notes that there are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment.

⁷ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/HCWS123>

⁸ <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

⁹ PPG ID: 74-006-20240214

23. The HBF also recommends that any policy or text in relation to the LNRS should set out how the Council intends to manage the interaction between LNRS, the planning system, and the implementation of BNG. The Local Nature Recovery Strategy, should map ecological assets, set conservation principles, identify opportunities for habitat creation, restoration and enhancement, and to set measures for the recovery of species population.

Viability

24. The Council will also need to ensure that they have considered viability, viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative costs of all relevant policies will not undermine deliverability of the Plan. The Council need to ensure that policy requirements should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned development to be deliverable without need for further viability assessment at the decision-making stage.

Monitoring

25. The HBF recommends that the Council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provide details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.

Future Engagement

26. 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.

27. 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,



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