

Planning Policy,
PO Box 304,
Ashton-under-Lyne,
Tameside,
OL6 0GA



SENT BY EMAIL
planpolicy@tameside.gov.uk
13/09/2024

Dear Planning Policy Team,

TAMESIDE LOCAL PLAN: HOMES, SPACES, PLACES

1. Thank you for consulting with the Home Builders Federation (HBF) on Homes, Spaces, Places in Tameside.
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 Tameside Local Plan, and that this is likely to have implications for the production of the Plan and the policies it contains.
4. The HBF also notes that the intention with this plan is to replace any remaining saved policy elements of the Unitary Development Plan and effectively fill any policy gaps left by Places for Everyone or the Minerals or Waste plans.

Plan Period

5. The document suggests that the Plan period runs until 2041. 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.

Environment

Does the plan need to set specific carbon or energy demand reduction targets for new development?

¹ NPPF December 2023 Paragraph 22



6. Policy JP-S2 of the Places for Everyone (PfE) document 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'.
7. 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 2023². The Council will also be aware that the Future Homes and Buildings Standards: 2023 consultation³ has been released covering Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating).
8. 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.

Does the plan need to set more detailed policies on flood risk beyond those set out in Places for Everyone and what about water efficiency?

9. The HBF does not consider it is necessary for the Plan to set more detailed policies than those already set within the PfE document, and supported by the NPPF and PPG. Policy JP-S4 of PfE suggests that flood risk will be managed by locating and designing development so as to minimise the impacts of current and future flood risk, including retrofitting or relocating existing developments, infrastructure and places to increase resilience to flooding; and expecting developments to manage flood risk. Whilst policy JP-G3 also states that in making planning decisions we will seek to reduce flood risk, through Natural Flood Management.
10. The NPPF⁴ also states that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change and that when new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures. It also states⁵ that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. More details in relation to how planning applications should be determined is found in paragraphs 172 to 175.

² <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/HCWS123>

³ <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

⁴ NPPF December 2023 paragraph 159

⁵ NPPF December 2023 paragraph 165

11. In relation to water efficiency the Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The Optional Technical Housing Standard is 110 litres per day per person.
12. As set out in the NPPF⁶, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. Therefore, a policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG. PPG⁷ states that where there is a 'clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day'. PPG⁸ also states the 'it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement'. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The North West and Tameside are not considered to be an area of Water Stress as identified by the Environment Agency⁹. Therefore, the HBF considers that optional water efficiency standards are not required for Tameside.

How should the plan ensure biodiversity and geodiversity is preserved and enhanced across Tameside?

13. 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.
14. The PPG¹⁰ 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.

⁶ NPPF December 2023 paragraph 31

⁷ PPG ID: 56-014-20150327

⁸ PPG ID: 56-015-20150327

⁹ 2021 Assessment of Water Stress Areas Update:
<https://www.gov.uk/government/publications/waterstressed-areas-2021-classification>

¹⁰ PPG ID: 74-006-20240214

15. 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.
16. 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.

Homes

17. 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 Tameside Table 7.2 identifies an annual average of 485 dwellings per annum (dpa), this is stepped going from 236dpa (2022-2025), to 485dpa (2025-2030) to 568dpa (2030-2039) with a total of 8,245 dwellings over the Plan period. The HBF considers that the Council should plan for growth, this would be in line with the NPPF¹¹ which states that Plans should be prepared positively, in a way that is aspirational but deliverable.
18. 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 Tameside increase to 1,233dpa. The HBF considers that this housing figure will need to be considered to reflect the latest government guidance in relation to the Written Ministerial Statement¹², and the proposed standard methodology and NPPF.

Should the Plan allocate specific land to meet Tameside's housing requirements?

19. The HBF considers that the Plan should allocate specific land to meet Tameside's housing requirements.
20. The HBF considers it is likely that the Council will need to review the Green Belt in order to ensure that they are able to allocate sufficient land to meet Tameside's housing requirements. The Written Ministerial Statement (WMS) (Building the Homes we Need) of Angela Rayner on 30th July 2024 clearly states that the Government is committed to ensuring the Green Belt serves its purpose, and that means taking a more strategic approach to Green Belt release. It goes on to state that we will start by requiring local authorities to review their Green Belt boundaries where they cannot meet their identified housing, commercial or other development needs. This has been followed up by the consultation on the NPPF, with the proposed paragraph 142 stating '*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced*

¹¹ NPPF 2023 Paragraph 16

¹² Building the Homes we need – Written Ministerial Statement 30th July 2024

and justified, through the preparation or updating of Plans. Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for housing. . . In these circumstances authorities should review Green Belt boundaries and propose alterations to meet these needs in full’.

Are there any additional areas of land which may have potential for new homes, that are not already identified within the Council’s Strategic Housing and Economic Land Availability Assessment?

21. The HBF recommends that the Council should work closely with the home building industry, land promoters and land owners to ensure that all appropriate areas of land have been identified.

How should the plan meet the needs of specific people or communities, particularly given the demographic trend of an ageing population?

22. The PPG¹³ 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 exists¹⁴. 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.

How are issues of affordability best addressed?

23. 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 NPPF¹⁵. 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.

People

How can the plan help to create an environment where health problems are reduced?

24. The NPPF is clear that planning policies should aim to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. The HBF considers that these elements can all help to create an environment where health problems are reduced.

How can the plan help to meet the needs of an ageing population?

¹³ PPG ID: 63-001-20190626

¹⁴ PPG ID: 63-006-20190626 & ID: 63-012-20190626

¹⁵ NPPF 2023 paragraphs 34, 63-66

25. This has already been covered in relation to housing above, but there may be other elements that are not housing related which could also be beneficial to meeting the needs of an ageing population which the Council will need to consider.

Travel

How should the plan further promote sustainable patterns of development?

26. The HBF considers that the Council will need to ensure that they have considered sustainable locations, or locations that can be improved as part of the development strategy for the Plan.

How should the plan increase the number of neighbourhood journeys undertaken by foot or by bike in Tameside?

27. The NPPF suggests that transport issues should be considered from the earliest stages of plan-making so that amongst other things opportunities to promote walking, cycling and public transport are identified and pursued and so that the potential impacts of development can be addressed. Policy JP-C1 of PfE 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 principle of sustainable and active travel, however, the HBF would suggest that the Council take a flexible approach to how that is undertaken within housing developments.

Places

How should the plan promote the quality design of buildings and spaces that also respects local character and distinctiveness?

28. The NPPF suggests that the creation of high quality, well designed sustainable buildings and places are fundamental to what the planning and development process should achieve. It suggests that being clear about design expectations and how these will be tested is essential for achieving this. Therefore, the HBF would expect the Council to work closely with the development industry to ensure that any policies are clear and realistic and will help to deliver high-quality, well-designed buildings and spaces. The HBF would strongly encourage the Council to ensure that any design requirements can be delivered and that they will not create viability issues in terms of delivery.

Monitoring

29. 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.

Viability

30. The HBF has not been able to find an up-to-date Viability Assessment. The HBF considers that a viability assessment will need to be prepared to reflect the current Plan

policies and requirements and the current costs. Without this part of the evidence, the HBF is not able to comment on the deliverability of the policy requirements or the Local Plan overall.

Future Engagement

31. 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.

32. 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)
Email: joanne.harding@hbf.co.uk
Phone: 07972 774 229