

Planning Policy
Tameside MBC
Clarence Arcade
Stamford Street
Ashton-under-Lyne
Tameside
OL6 7PT
Email: planpolicy@tameside.gov.uk

06/03/2017

Dear Sir / Madam,

Tameside Local Plan: Proposed Subject and Scope

1. Thank you for consulting the Home Builders Federation (HBF) on the proposed subject and scope of the Tameside Local Plan.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. The HBF is keen to work with the Council in order to achieve an adopted local plan which enables an increase in the rate of house building across Tameside. The Council may be aware that the HBF also submitted comments upon the Draft Greater Manchester Spatial Framework (GMSF). The GMSF is intended to provide the over-arching strategic planning framework for the whole of Greater Manchester and as such it will have a significant bearing upon the policies and requirements within the Tameside Local Plan. Within our following comments we do make reference to our response to the GMSF. However, at this stage, to aid brevity we have tried to focus solely upon the proposed subject and scope of the Tameside Local Plan wherever possible.
4. The HBF is supportive of the GMSF process. It is, however, clear that it is likely to be a controversial process. With this in mind the Council should consider its options for the Local Plan if the GMSF were to experience any significant delays to ensure it can get a new plan in place as a matter of urgency.
5. The HBF wish to make the following brief comments upon the subject and scope of the Tameside Local Plan.

Conformity with the GMSF

6. The HBF is supportive of the GMSF concept, vision and process. Whilst we have a number of concerns with the GMSF content, including the housing requirement, we consider it appropriate that the Tameside Local Plan is consistent with the GMSF aims, objectives, strategy and strategic allocations. We would therefore anticipate the Local Plan to incorporate and build upon the GMSF.

Evidence Base

7. It is notable that significant elements of the Council's evidence base will require updating to ensure that the plan is based upon a robust understanding of the key issues within the area. In particular the HBF would anticipate updates to the Strategic Housing Market Assessment, Strategic Housing Land Availability Assessment and an assessment of the cumulative impact of policies and obligations upon economic viability. The HBF and our members can provide valuable information and experience with regards to all of the aforementioned documents. The Council is therefore strongly encouraged to engage with the industry to ensure the updated evidence is both realistic and robust.
8. In terms of the Duty to Co-operate many cross-boundary issues will be considered through the GMSF process. It is, however, considered important that the evidence base provides specific information upon how the Council has discharged its requirements under the duty in relation to this plan.

Policy Areas

9. Whilst there is very limited information within the subject and scope letter the policy areas identified are generally considered appropriate. The HBF will provide greater consideration once further detail upon the type, form and content of the policies is known. At this stage we would like to provide the following comments upon specific policy areas identified in the subject and scope letter.

Design Quality

10. The HBF recognise the importance of good design, indeed we are key partners in Building for Life. It is, however, important that any design policy is not overly prescriptive and does not place undue burdens upon development. This is required to ensure that development remains viable and the industry is able to react to local site and market conditions at the time of the development.

Non-strategic housing policies and allocations

11. The HBF is supportive of providing non-strategic allocations which compliment strategic allocations set out within the GMSF. In making these allocations it is imperative that they meet the criteria set out within footnote 11 to paragraph 47 of the NPPF. This should be clearly evidenced.
12. In terms of delivery it is clear that the Council has under-delivered against previous targets for a number of years. The reasons behind this under-delivery need to be understood and the lessons factored into the policy responses in the Local Plan. It is no use persisting with previous policies which have failed to deliver in the past. Indeed the recent Housing White Paper indicates remedial action will be required from November of this year.
13. The following table indicates the net increase in dwellings over the period 2004/5 to 2013/14. Whilst it is recognised that the Regional Spatial Strategy (RSS) has been revoked it does serve to illustrate the level of under-delivery over the past decade. Given this past performance it is clear that the housing policies within the plan need to provide a positive framework which assists housing delivery by removing barriers. The Council should ensure that plan policies provide in-built flexibility to deal with changing circumstances. Restrictive policies and unnecessary burdens should be avoided.

Delivery	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	Total
AMR ¹	383	684	563	789	652	253	286	350	522	366	4,848
RSS target	750	750	750	750	750	750	750	750	750	750	7,500

14. It is also worth noting that the draft GMSF identifies an annual average need for at least 680 dwellings per annum in Tameside. This is not unattainable, the levels of delivery in 2005/6 to 2008/9 bear testament to this. The Local Plan, in conjunction with the GMSF, provide significant opportunity to create the correct policy environment to ensure such levels of delivery or greater are consistently met.
15. To aid delivery it is recommended that the Local Plan seek to provide a buffer of sites over and above its requirement. This will provide flexibility and choice within the market and provide greater opportunities to meet the housing need in full. Given the previous levels of under-delivery within Tameside it would appear prudent to provide a significant buffer over the plan period. In line with the LPEG recommendations to Government² the HBF suggests a 20% to be appropriate. Such

¹ Tameside MBC Local Plan Authority's Monitoring Report 2013/14

² Local Plan Expert Group (2016): Report to the Communities Secretary and to the Minister of Housing and Planning

an approach would also be consistent with the NPPF requirements for the plan to be positively prepared and flexible.

Information

16. I trust that the Council finds the foregoing useful. The HBF would be happy to discuss this response further if required. We are also keen to remain involved in the Tameside Local Plan and as such wish be kept informed of the next stage of consultation upon this document.

Yours sincerely,

MJ Good

Matthew Good
Planning Manager – Local Plans
Email: matthew.good@hbf.co.uk
Tel: 07972774229