

Planning Policy and Projects,  
Places: Economy and Skills,  
Wigan Council,  
PO Box 100,  
Wigan,  
WN1 3DS



SENT BY EMAIL  
planningpolicy@wigan.gov.uk  
14/12/2023

Dear Planning Policy Team,

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

1. Thank you for consulting with the Home Builders Federation (HBF) on Planning for the Future to 2040 Local Plan Options and Preferences 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.

### **Plan period**

3. 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.

### **Vision and Objectives**

4. The objectives for homes is *'to ensure that new housing provides a range of options to suit residents' needs, including affordable housing and specialist housing, and is supported by the right infrastructure including transport links, access to schools and greenspaces'*.
5. The HBF generally supports the proposed objective in relation to providing a range of options to suit residents' needs. However, the HBF considers that the objective could go further and ensure that they provide an appropriate level of housing provision which will meet locally generated needs and aspirations for both market and affordable housing, to

---

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



meet provide a range and mix that can provide for all elements of the community including family homes and those for older people and to provide an appropriate balance between employment and housing.

## Homes

6. The Council state that their preference is to plan for a mix of types of new homes that meet needs in terms of size, type, tenure, affordability and specific needs. It states that their priorities would be to provide more affordable housing, more family housing to meet aspirations, more housing for older people, specialist forms of housing to meet identified needs, plots of self-build and planning for many more homes in our town centres to create new communities.
7. 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. 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.
8. 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.
9. 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.
10. 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.

---

<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>

11. The Council have set out that the Local Plan has to show that enough land to meet their housing needs over the next 15 years, it also highlights that the Places for Everyone Plan sets this at an average of 972 new homes per year. They have stated that an important part of their supply is a number of large sites around 5,100 dwellings from a total requirement of around 15,000 dwellings. The Council propose to have a specific policy for each of these large sites.
12. The HBF notes that the emerging Places for Everyone document proposes a housing requirement for Wigan of 16,527 dwellings in the period 2022-2039, with an annual average of 972 dwellings per annum (dpa). 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.
13. 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.
14. 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.

## **Transport**

15. The Council state that their preference is to ensure that active travel is the first and natural choice for shorter distance journeys. They suggest that they will ensure that new development is designed to incentivise travel by active modes for shorter journeys and to access bus and / or rail services including the provision of shorter routes than general traffic must take. It also suggests that new development should connect to the dedicated active travel network, and the new development should include complimentary measures such as secure cycle parking. The HBF considers that 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.
16. The Council are also looking to revise their existing parking standards, they suggest that this should incorporate adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. The HBF considers that now that the Building Regulations are in place in relation to charging points the Council does not need to introduce their own alternative requirements which are over and above these which may create confusion and unnecessary duplication of requirements.

## **Environment**

17. 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.
  
18. 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<sup>4</sup>. 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.

## **Future Engagement**

19. 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.
  
20. 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](mailto:joanne.harding@hbf.co.uk)  
Phone: 07972 774 229

---

<sup>4</sup> <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation>