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Dear Planning Policy Team,

OLDHAM LOCAL PLAN: LOCAL PLAN REVIEW DRAFT LOCAL PLAN

1. Thank you for consulting with the Home Builders Federation (HBF) on the Oldham Local Plan: Local Plan Review Draft 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. Whilst not a matter of soundness it would be helpful if the council could include clause / paragraph numbers within all of the policies. The numbering of each clause / paragraph within a policy aid referencing for those making representations on the local plan as well as for applicants and decision makers following the adoption of the plan.

Plan Period

4. The Draft Plan appears to cover a period of 2022 to 2039. 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 Plan period to 2039 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 (PfE) 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

5. The Council are proposing Plan Objectives, the first of which states 'building quality homes to meet local needs and diversify the housing offer by: providing for, and supporting, the delivery of 11,560 new homes; delivering a diverse housing offer to meet the needs of all our residents including affordable housing and homes for families, older

¹ NPPF 2023 Paragraph 22



people and disabled people; ensuring the delivery of high quality, sustainable and well-designed new homes; and ensuring appropriate densities and making the best and most effective use of brownfield land'. The HBF considers that it is appropriate for the Council to identify housing as an objective for the Plan.

Homes

6. Oldham's local housing need is set out in Places for Everyone (PfE), it sets out that Oldham is required to deliver 11,560 homes over the period 2022 to 2039, which equates to 680 dwellings per annum (dpa). This dwelling requirement is phased over the plan period: 404dpa in the period 2022-2025; 680dpa in the period 2025-2030; and 772dpa in the period 2030-2039.

Policy H1: Delivering a Diverse Housing Offer

7. This policy suggests that residential applications will be permitted where the site is allocated for residential development, the site is identified within the Strategic Housing Land Availability (SHLAA) or the proposal is small-scale comprising conversion or change of use and less than 10 dwellings. It also states that proposed development on sites identified in the SHLAA and those not identified and where they are previously developed will be considered favourably where they comply with national planning policy and guidance, PfE and Local Plan policies.
8. The HBF considers that this policy should be reviewed for clarity and to ensure that it does not repeat national policy unnecessarily. The HBF is concerned that the policy states that planning applications will be permitted where the site is identified within the SHLAA, but then sites in the SHLAA are mentioned again in the next paragraph where it states that they will be considered favourably where they are previously developed and comply with national policy and guidance, PfE and Local Plan policies. The HBF considers that this creates inconsistency in relation to sites identified in the SHLAA. The HBF also considers that that policy does not actually identify the status that a site may have in the SHLAA and that they may also lack clarity.

Policy H2: Housing Mix

9. This policy states that new residential developments should contribute to a diverse housing mix. It goes on to state that within Oldham Town Centre, Oldham's other centres and within 400m of transport hubs the housing mix shall predominately be for apartments. It suggests that outside of these areas the mix should be as set out in Table H2, this states that for market housing this should be 70% 3-beds or more and 30% 1 or 2-beds. The policy also sets out circumstances where an alternate mix may be appropriate.
10. The HBF understands the need for a mix of house types and sizes and is generally supportive of providing a range and choice of homes to meet the needs of the local area. The policy recognises that there may be some circumstances when an alternative mix may be appropriate, however, the HBF recommends a more flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location and market.

Policy H3: density of New Housing

11. This policy sets out the minimum housing densities expected ranging from 35 dwellings per hectare (dph) to 120dph. It sets out circumstances where lower densities may be acceptable including a demonstrable need for a particular type of house or site-specific issues.
12. The setting of residential density standards should be undertaken in accordance with the NPPF² where policies should be set to optimise the use of land. The HBF would recommend the Council ensure appropriate flexibility is provided by this policy to allow developers to take account of the evidence in relation to site specific conditions, market aspirations, deliverability, viability and accessibility.
13. 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, SuDs, tree provision, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency and parking provision will all impact upon the density which can be delivered upon a site.
14. The policy also states that in line with PfE Policy JP-H3 the gross internal floor area of new homes will, as a minimum, meet the nationally described space standards (NDSS). The HBF does not consider that it is necessary for the policy to repeat the policies in the PfE document, however, it would be beneficial for this reminder to be kept within the justification text.

Policy H4: Homes for Older People

15. This policy states that developments of 150 homes and above are required to provide a minimum of 30 units and a further 20 units for each additional 200 homes thereafter, for housing provision which is suitable for older people, where there is a demonstrated local need at the time of the application. It suggests that these units could include age restricted market housing such as bungalows or level access homes; extra care housing; sheltered housing; and nursing and care homes. It then goes on to provide criteria that older people's housing must meet.
16. PfE Policy JP-H3 states that all new dwellings must be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations unless specific site conditions make this impractical.
17. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, the HBF is concerned about the justification for this policy, clarity of this policy, the consistency of the policy and the viability of this policy.
18. The HBF does not consider that it is clear why all developments of 150 homes or more would need to provide specific homes for older people. It is not clear what the justification is for the policy, why the 150 home threshold and why these homes are

² NPPF 2021 Paragraph 125

needed over and above those provided by the provision of the M4(2) standards which provide accessible and adaptable dwellings and will be applied to all dwellings as set out in the PfE policy. The PPG³ is clear that accessible and adaptable housing enables people live more independently, while also saving on health and social costs.

19. The HBF considers that the Council should note the difference between homes suitable for older people (eg M4(2) homes or single storey homes) and specialist housing for older people (eg sheltered care), and the difference in need and demand for these types of homes.
20. The HBF is concerned that the viability of providing 30 units for older people as specialist housing for older people has not been fully considered, particularly as there can be significantly different costs between types of specialist housing such as age restricted market housing, extra care, sheltered housing or nursing homes.
21. The HBF also considers that it is not clear what would happen on a site of more than 150 dwellings where there is not an area that meets all of the principles set out in the final paragraph of the policy.
22. The HBF notes that if the Council wishes to adopt the higher optional standards for wheelchair user homes (M4(3)) the Council should only do so by applying the criteria set out in the PPG. The PPG⁴ 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. It is incumbent on the Council to provide a local assessment evidencing the specific case for Oldham which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, and the ability to provide step-free access.
23. The HBF would suggest that the Council should not rely only on strategic sites to meet the need for specialist accommodation to the exclusion of standalone allocations for this type of development and in particular retirement accommodation. Whilst there is general support for such development, the HBF would recommend that the Council should be more proactive in working with providers of this type of development to identify appropriate sites for allocation. This approach would provide far more certainty to the council that the need for such accommodation will be met in full.

Policy H5: Homes for Disabled People

24. This policy states that developments of 150 homes and above are required to provide a minimum of 30 units and a further 20 units for each additional 200 homes thereafter, for

³ PPG ID: 63-008-20190626

⁴ ID: 56-007-20150327

housing provision which is suitable for disabled people, where there is a demonstrated local need at the time of the application. The policy appears to recognise that policies H4 and H5 overlap and suggests that suitable homes for disabled people could also include supported housing and accessible and adaptable homes. Where the homes proposed as part of a development are suitable for both older people and disabled people (irrespective of age), the requirement may be combined to 30 homes suitable for older people and disabled people for developments of 150 homes and above or sites larger than 4ha (and a further 20 homes for each additional 200 homes thereafter). In these instances, it should be ensured that the resultant housing mix is appropriate for both groups. The policy then goes on to set out the criteria which homes for disabled people need to meet.

25. The HBF considers that this policy has similar issues to Policy H4, and as such has not repeated the concerns above but considers that they apply to this policy also.
26. This policy acknowledges the potential for overlap between this policy and policy H4, however, whilst it states that the requirement may be combined it is perhaps not entirely clear how it would be demonstrated that the resultant housing mix is appropriate for both groups. For example, if it is age restricted homes that are wheelchair accessible are they considered to cater for both groups or not?
27. Again, the HBF would recommend that the Council reviews this policy and works with providers of supported housing and disabled people in the community to ensure that the policy is the most appropriate way to deal with any evidenced need.

Policy H7: Affordable Housing

28. This policy states that all developments that provide 10 or more net additional homes should provide affordable housing in line with Table H4. Table H4 sets out the affordable housing proportion ranging from at least 10% on sites of 10-24 homes in Zone 3 to at least 30% on sites of 150 homes or more in Zone 1. It also sets the tenure split as 25% social rent, 25% affordable rent, and 50% Intermediate / Shared Ownership, although it does state that an alternate split may be acceptable. The policy also sets out exceptional circumstances where the full amount of affordable housing may be reduced at the Council's discretion.
29. The Oldham Local Housing Needs Assessment 2019 (LHNA) identifies an annual net imbalance of 203 affordable dwellings. The HBF supports the need to address the affordable housing requirements of the borough. The NPPF⁵ is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. As the Council has not provided a Viability Assessment during this consultation it is not possible for the HBF to comment on the soundness or suitability of this policy.

⁵ NPPF Paragraph 34

Policy H11: Custom / Self Build and Community-led Housing

30. This policy states that in areas identified as having evidence demand for self or custom build, residential developments with a capacity of 50 homes and above must provide 2% of the total site units for self or custom build.
31. The HBF would be keen to understand the evidence to support the need for custom and self-build housing in Oldham, and how it has informed the requirements of this policy. The PPG⁶ sets out how custom and self-build housing needs can be assessed. The LHNA sets out that at the end of October 2018, there were 184 individuals on the Council's self-build register, 30 of whom had registered in the past year. It sets out the most popular locations are Saddleworth and Lees with 34.2% of people choosing this as their preferred locations.
32. The HBF does not consider that the Council has appropriate evidence to support the requirement for developers on sites of 50 dwellings or more to provide 2% of all new homes as plots for custom or self-build housing. The HBF is concerned that as currently proposed this policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes. The HBF considers that the Council's evidence does not show that there is a demand from custom and self-builders to live on sites within a larger residential development scheme.
33. The PPG⁷ sets out how local authorities can increase the number of planning permissions which are suitable for self and custom build housing. These include supporting neighbourhood planning groups to include sites in their plans, effective joint working, using Council owned land and working with Home England. The HBF considers that alternative policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities across the Borough including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.

Policy H13: Housing and Mixed-Use Allocations

34. This policy allocates sites for residential development. Table H9 sets out the Council's housing land supply, it suggests that there are 10,283 dwellings in the SHLAA, 923 dwellings in the small sites allowance and 1,980 dwellings in the proposed Places for Everyone allocations giving a total of 13,186 dwellings.
35. The HBF has no comments on the individual proposed housing allocations in Policy H13 and these representations are submitted without prejudice to any comments made by other parties. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.

⁶ PPG ID: 67-003-20190722

⁷ PPG ID: 57-025-20210508

36. The Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver Oldham's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS), and achieve Housing Delivery Test (HDT) performance measurements. The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites and to provide flexibility and choice within the market. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.
37. The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where 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 / competition in the land market.
38. 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.

Policy CC1: Sustainable construction, energy efficiency and retrofitting

39. This policy states that developments will be required to achieve high standards of sustainable design and construction in order to mitigate the effects of climate change and to realise the Council's ambition of achieving carbon neutrality by 2030. It goes on to state that applicants should include details of how this policy has been met in an Energy Statement.
40. The HBF supports the Council in seeking to meet the challenge of mitigating and adapting to the effects of climate change. The HBF considers that the Council should ensure that this policy is only implemented in line with the December 2023 Written Ministerial Statement⁸ which states that 'a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes'. It goes on to state that 'the Government does not expect plan-makers to set local energy

⁸ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale'. The HBF considers as such it would be appropriate to make reference to the Future Homes Standard and the Building Regulations as the appropriate standards for development. The Council will also be aware that the Future Homes and Buildings Standards: 2023 consultation⁹ has been released covering Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating).

Policy CC5: Water Efficiency

41. This policy states that all new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations G2: Water Efficiency or any future updates.
42. The HBF notes that 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.
43. As set out in the NPPF¹⁰, 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. PPG¹¹ 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'*. PPG¹² 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 Oldham are not considered to be an area of Water Stress as identified by the Environment Agency¹³. Therefore, the HBF considers that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted.

⁹ <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

¹⁰ NPPF Dec 2023 paragraph 31

¹¹ ID: 56-014-20150327

¹² ID: 56-015-20150327

¹³ 2021 Assessment of Water Stress Areas Update:

<https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>

Policy N2: Restoring Nature

44. This policy states that development, except where exempt, will only be permitted where a measurable Biodiversity Net Gain (BNG) of a minimum 10% is demonstrated, and secured for at least 30 years.
45. 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%. The HBF considers that this policy may need to be kept under review as more information becomes available on the emerging guidance and legislation. PPG has recently been updated to provide more information on BNG which may assist the Council as they consider this policy. The PPG¹⁴ states that plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provision of this statutory framework. It also states that it would be inappropriate to include policies which are incompatible with this framework.

Policy N3: Enhancing Green Infrastructure through development

46. This policy states that developments for 20 homes or more will be required to enhance the landscape setting of the site, enhance pedestrian and cycle connectivity and provide for the production of food where possible. It also goes on to state that developments must aim for 20% tree cover.
47. The HBF considers that there is no justification or evidence for encouraging food production. The HBF is also concerned in relation to the implications of this policy in terms of viability, efficient use of land and site layouts. The HBF is also not sure whether residents of all new developments would want community allotments or food growing opportunities, and it is not clear what would happen where these facilities are not used in an appropriate manner or are not maintained for food growing. The HBF considers this part of the policy should be deleted.
48. The HBF is also concerned in relation to the aim for 20% tree cover, this has significant implications in relation to site densities, sites layouts, highways, ongoing maintenance, and the viability of development. It also not clear how this policy's aim related to Policy N4: Tree Replacement. The HBF considers this part of the policy should be deleted.

Policy N4: Tree Replacement

49. This policy states that tree replacement will only be acceptable where the Council is satisfied that the applicant has demonstrated exceptional justification for their proposed removal. The number of replacement trees required will depend on the stem diameter of the tree proposed for the removal this is set out in Table N1, with a tree replacement between 1:2 and 1:9.
50. The HBF considers that the tree replacement ratios used have potential to have a significant impact on the land uptake for any development and may have significant implications for the density of developments, this in itself has potential to have a

¹⁴ PPG ID: 74-006-20240214

significant impact on the viability of developments. The tree replacement ratio may also have implications in relation to highway provision and highway maintenance and again may need to be given further consideration by the Council and the developers of these sites.

Policy D3: Design Scrutiny

51. This policy states that applicants should make use of the design review process to assess and inform design options early in the planning process. It states that development proposals in a number of circumstances, for example those that exceed 50 dwellings or have a density of 50dph, must have undergone at least one design review early on in their preparation before a planning application is made. The policy also looks for developments of 10 or more dwellings to use the Building for a Healthy Life tool.
52. The HBF is generally supportive of the use of Design Review, but it will be important that this tool is used appropriately and in a proportionate manner. Design Review is broadly considered to be a valuable method to promote good design and an efficient way to improve quality. The HBF considered that if they are well managed Design Review Panels can provide high quality design advice that can add value to the places in which they are built. The HBF considers that it will be important that any design review is undertaken at the right time, that any feedback provided is constructive and sufficiently detailed, that an appropriate planning balance is sought to ensure that all policy requirements can be met not just those in relation to design, and to ensure that the applicant is fully engaged in the process.

Policy T4: Providing for electric vehicle charging points

53. This policy looks for new development to make provision for electric vehicle charging infrastructure.
54. The HBF considers that the provision of electric vehicle charging capability is unnecessary as Part S of the Building Regulations now provides the requirements for Electric Vehicle charging, including where exceptions may apply.

Policy CO6: Securing Educational Places through New Residential Development

55. This policy states that for major development of 10 dwellings or more, where demand resulting from a residential development will create or exacerbate a shortfall in the number of local school places, the Council will seek to secure new and or improved education facilities.
56. The PPG¹⁵ sets out that plan makers and the education authority need to work collaboratively to identify which schools are likely to expand and where new schools will be needed as a result of planned growth. It goes on to highlight that it is important that costs and land requirements for education provision are known to inform site typologies and site-specific viability assessments. It also states that the cumulative costs of all relevant policies should not be of a scale that will make development unviable. Again, as the Council have not provided a Viability Assessment as part of this consultation, the HBF is not able to comment on the soundness or appropriateness of this policy.

¹⁵ PPG ID: 10-029-20190509

Policy CO7: Health Impact Assessments in New Development

57. Residential development of 100 dwellings and above must be supported by a Health Impact Assessment (HIA). A HIA may be required for other developments where significant health implications are identified.
58. The HBF generally supports plans that set out how the Council will achieve improvements in health and well-being. In preparing its local plan the Council should normally consider the health impacts with regard to the level and location of development. Collectively the policies in the plan should ensure health benefits and limit any negative impacts and as such any development that is in accordance with that plan should already be contributing positively to the overall healthy objectives of that area.
59. The PPG¹⁶ sets out that HIAs are ‘a useful tool to use where there are expected to be significant impacts’ but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Consequently, where a development is in line with policies in the local plan a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring a HIA. In addition, the HBF considers that any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. The requirement for HIA for development proposals of 100 dwellings or more without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.

Policy IN2: Planning Obligations

60. This policy states that in some cases, a site-specific viability assessment may be submitted where the need for such is evidenced by a change in circumstances which could not have been evident in the whole plan viability assessment.
61. The NPPF is clear that Plans should set out the contributions expected from development and that such policies should not undermine the deliverability of the Plan. The Viability Assessment has not yet been prepared and as such it is not possible to for the HBF to comment on the viability of the policies proposed in this Plan.
62. The HBF is concerned that the Council are restricting the circumstances where it is possible to submit a Viability Assessment, as the HBF considers that it is likely that the Viability Assessment when prepared will highlight viability challenges within Oldham, and in which case it would seem inappropriate not to accept site specific viability assessments on all sites.

Policy IN3: Delivering Social Value and Inclusion

¹⁶ PPG ID:53-005-20190722

63. This policy states that all planning applications for major developments shall be supported by a Social Value Strategy.
64. Many residential developments will bring with them social benefits, through the provision of new more sustainable homes and potentially through the provision of affordable homes and other infrastructure provided through planning obligations. In 2018 the HBF and Lichfields' produced a report on The Economic Footprint of House Building in England and Wales¹⁷ this document not only highlighted the economic benefits but also the social benefits. It highlighted that in 2017 house building created nearly 698,000 jobs, supported 4,300 apprentices, 525 graduates and 2,900 other trainees, provided £4.2bn of new affordable homes, £841m provided for infrastructure including £122m on new and improved schools, £45m invested in open space, community, sport and leisure facilities and an additional £5.9bn spent in local shops and services by residents of these new homes.
65. However, the HBF does not consider that it is necessary to include a policy requiring major proposals to provide details of what social value outcomes will be delivered and how this will be measured and assessed. This is an unnecessary burden to place on applicants and is unlikely to add value to a development, over and above the general benefits associated with development as set out above.

Monitoring

66. 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 more 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

67. 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.
68. 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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