

Strategic Planning and Information
Economy, Skills and Neighbourhoods
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Dear Planning Policy Team,

OLDHAM LOCAL PLAN: ISSUES AND OPTIONS CONSULTATION

1. Thank you for consulting with the Home Builders Federation (HBF) on the Oldham Local Plan Review Issues and Options 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 would like to submit the following comments upon selected sections and questions within the Issues and Options consultation document. These responses are provided to assist the Council in the preparation of the emerging local plan. The HBF is keen to ensure that Oldham Council produces a sound plan which provides appropriate policies for the area.

Homes

4. Paragraph 14.1 identifies that Oldham's current Local Housing Need (LHN) is 683 dwellings per annum (dpa) as calculated using the Standard Method. It highlights that this is above the current local plan housing requirement of 289dpa and higher than recent completions which over the past five years have average 431dpa. The Plan goes on to set out the proposed stepped housing requirement from the draft GMSF 2020. Places for Everyone the Joint Development Plan Document (DPD) for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, Wigan (Aug 2021) sets out a slightly different stepped requirement from the previous document. It is however, assumed that the Oldham Local Plan will be updated to remain in line with the Joint DPD. This would potentially see the housing requirement amended to a minimum annual average of 680dpa (net), with 352dpa between 2021 and 2025, 680dpa between 2025 and 2030 and 868dpa between 2030 and 2037.
5. The HBF would note that the housing figure calculated by the Standard Method is the minimum housing need and there may be circumstances when it is appropriate to plan for a higher housing need figure than the standard method identifies. These circumstances include where there are growth strategies, strategic infrastructure improvements, an unmet need from neighbouring authorities or where previous levels of



housing delivery in the area or previous assessments of need are significantly greater than the outcome of the standard method. The Council will need to ensure that they have explored each of these circumstances.

6. The HBF also has concerns around the stepping of the housing requirement and would look for the Council to ensure that housing need is addressed as soon as is possible. The HBF recommends that the Council seeks to increase the numbers of homes to be provided for in the earlier steps and that the Council works with landowners and developers to assist in delivery of these homes.
7. The Plan goes on to consider the available housing land supply. It suggests that the housing supply is less than that required by the proposed housing requirement and that therefore allocations will be needed, and land will be released from the Green Belt. The HBF supports the Council in seeking to ensure that there is sufficient land available to meet the housing needs. The HBF would encourage the Council to clearly set out the exceptional circumstances identified to support the need to release Green Belt, including the need to meet their local housing need. The Council have identified the need to ensure that they have a range of housing land sites including larger sites, this would help to support a more diverse range of developers.

Homes for an Ageing Population

8. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. The Lifetime Homes standard is no longer applicable following the Government's Housing Standards review, Lifetime Homes have now been replaced by the optional Building Regulations accessibility standards (M4(2) and M4(3)). These standards can be introduced via a plan but only where there is specific evidence to justify their inclusion. 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.
9. PPG¹ identifies the type of evidence required to introduce such a policy, 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.
10. The HBF considers that the Council should work closely with the developers and providers of older persons accommodation to determine the most appropriate approach to aiding in their delivery, this may include providing allocations in suitable locations.

Providing for a Diverse Housing Offer

11. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the

¹ ID: 56-007-20150327

local area. The HBF recommends a flexible approach is taken in any policy 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. The HBF also considers that the mix should not be limited by one form of evidence, as this can become quickly dated and other evidence and information may be more appropriate for a particular location or more up to date.

Affordable Housing

12. The Council will need to provide further information in to how the need varies across the borough before any consideration can be given to whether this would be appropriate. The HBF also considers that the Council will need to determine the viability of providing an affordable housing requirement borough-wide or for specific zones dependent on need before consideration can be given to whether either approach is appropriate. Without further evidence the HBF is not in a position to determine if a 30% affordable housing target may be appropriate, the HBF suggests that viability evidence will be necessary to determine an appropriate level. It may be that there are circumstances where exceptions to the affordable housing requirements are appropriate, again these could be in relation to the type, location and viability of development provided. The Council will need to consider this part of their viability assessment and policy development.

13. The NPPF² states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. The PPG states that First Homes are the Government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. The 25% First Homes contribution can make up or contribute to the 10% of the overall number of homes expected to be an affordable home ownership product. However, there may be circumstances where the 25% First Homes does not provide sufficient homes to meet the 10% affordable home ownership and this will need to be considered prior to any other tenure split, unless the Council has evidence to explain why this would not be appropriate. The Council will then need to consider if they want to further split the remainder between social and / or affordable rent and an intermediate tender.

Providing for Self-build and Custom Housebuilding

14. Many of our members will be able to assist the custom build sector either through the physical building of dwellings on behalf of the homeowner or through the provision of plots for sale to custom builders. The HBF is, therefore, not opposed to the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. However, the HBF considers that the Council will need to work closely with those on the Self-Build Register to determine whether allocated sites would be appropriate.

² Paragraph 65

15. The HBF considers that the provision of a certain percentage self-build plots on schemes above a certain size adds to the complexity and logistics of development and may lead to the slower delivery of homes. The provision of self-build plots on new housing developments cannot be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site, from both a practical and health & safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. Furthermore, any differential between the lead-in times / build out rates of self-build plots and the development of the wider site will result in construction work outside of specified working hours, building materials stored outside of designated compound areas, etc and unfinished plots next to completed / occupied dwellings causing customer dissatisfaction.
16. Where plots are not sold, these plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original developer should be as short as possible because consequential delay presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original developer has completed the development and is forced to return to site to build out plots, which have not been sold to self-builders.
17. As well as on-site practicalities, any impacts on viability should be tested and additional costs should be fully accounted for in the Council's viability assessment. The inclusion of self-build plots will have a fundamental bearing on the development economics of the scheme. Site externals, site overheads, and enabling infrastructure costs are fixed and borne by the site developer. The developer will also have borne up front site promotion costs, including planning and acquisition costs. It is unlikely that these costs will be recouped because the plot price a self-builder is able to pay is constrained by much higher build costs for self-build. Profit obtainable if the house was built and sold on the open market by the site developer is foregone. There are also worst-case scenarios of unsold plots remaining undeveloped and disruption if unsold plots are built by the site developer out of sequence from the build programme of the wider site or a return to site after completion of the wider site.

Density

18. The Plan includes the Draft GMSF density assumptions for new housing, these range from a minimum density of 120 dwellings per hectare (dph) within town centres or within 400m of a rail station to 35dph. The HBF generally supports the use of a density policy, making efficient use of land and making as much use as possible of previously developed land (PDL) in accordance with the NPPF. However, the HBF considers that it is important to ensure that the prioritisation of higher density development and the use of PDL does not compromise the delivery of homes in sustainable locations to meet local needs. The HBF considers that the Council should ensure there is flexibility within their policy to ensure that development is viable, sustainable and appropriate and that the local character is not lost due to the emphasis on establishing higher densities. The HBF considers that it would be beneficial to consider the reality of the density requirements alongside the impacts of all of the Council's policy requirements and emerging

Government policy. This could include the use of the M4(2) and M4(3) standards, the nationally described space standards (NDSS), provision of cycle and bin storage, the mix of homes provided, the availability of EV Charging alongside parking, any implications of design coding and the provision of tree-lined streets, highways requirements, the potential requirements in relation to Biodiversity Net Gain, changes to the Building Regulations requirements in relation to heating and energy and the Future Homes Standard.

Renewable Energy and Low Carbon Energy

19. The HBF is generally supportive of the use of modern methods of construction (MMC) but considers that a policy to set a preference for the use of MMC is unnecessary. The home building industry is a progressive industry that has, for many years, adopted a range of innovative methods to improve the sustainability, efficiency and reliability of materials and processes in the lifecycle of a construction. This ranges from the use of digitally enabled house type designs delivered through partnerships with offsite manufacturers and the wider supply chain, to the use of new building methods or assemblies. Due to the variety of methods encompassed under the broad umbrella term, MMC, there can be confusion as to the true extent of MMC taking place in the homebuilding industry. Research published by the National House-Building Council (NHBC) Foundation back in 2016 found that the majority of house builders and housing associations are using, or have considered, at least one MMC approach within their recent build programmes. However, it should be noted that the ability to scale up the delivery of MMC is determined by external factors as well as the appetite of home builders.

20. The Council may also need to consider how the promotion of MMC would sit alongside the Council's other policies particularly those in relation to design or housing mix. As the need to create variety of individually designed homes for each authority or area within an authority, along with the appropriate mix of homes to meet the local need is often at odds with the volumetric construction required by MMC which requires repetitive or standardised designs in order to be effective.

Biodiversity

21. The HBF does not consider that there are any instances where it would be appropriate for the Council to introduce a higher biodiversity net gain requirement. The HBF considers that the 10% requirement likely to be set out in the Environment Act will be an appropriate level and considers that a consistent approach would be beneficial to the industry.

Design

22. The HBF considers that if any detailed design policies are introduced the Council should consider the viability of such proposals and how they would sit alongside other requirements, such as the Future Homes Standards or density policies.

23. The HBF is generally supportive of the use of Design Review Panel, as it is broadly considered to be a valuable method to promote good design and an efficient way to improve quality. Well managed panels can provide high quality design advice that can

add value to the places in which they are built. However, it is important that any Design Review Panel is well run ensuring that the review is undertaken at an appropriate point in the application process, that any feedback provided is clear, constructive and effective and isn't taken in isolation from other elements of planning policy, that a clear planning balance is considered as part of the process and that there is a clear role for the applicant to be engaged within the process. Given the time and resources that it can take to run an effective design review, from both the developer and the Council, it will be important that the Council sets the threshold at an appropriate level of development.

24. The HBF is generally supportive of the use of Design Codes and the benefits of a developer preparing or contributing to the production of a Code. However, again given the time and resources that can be involved in preparing these Codes it is important that the threshold is set at the right level and that a level of flexibility is introduced to allow for circumstances where a developer may want to prepare a Code at a lower level or where exceptions to the threshold may be appropriate.
25. The HBF is generally supportive of the use of Building for a Health Life, however, it is not considered appropriate to specify a target such as ensuring 12 'greens' under Building for a Healthy Life for all new residential development. The guidance is clear that it is intended to be used a design process structure not a scoring system. Building for a Healthy Life includes 12 considerations for design, and highlights that there may be circumstances where a green light is not possible, this does not mean a development should not be taken forward.

20 Minute Neighbourhood

26. The HBF generally accepts the principles of the 20minute neighbourhood, these principles may be appropriate as a thread to run throughout the Local Plan. However, it will be important for the Council to maintain some flexibility to this policy approach and to ensure that it allows for the development of areas where there is the potential to create a 20minute neighbourhood.

Electric Vehicle Charging

27. The HBF recognises that electric vehicles will be part of the solution to transitioning to a low carbon future. However, the Council should acknowledge that this proposed policy approach may be superseded by the Government's proposals to change Building Regulations and may not be needed. The Department of Transport consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019) set out the Government's preferred option to introduce a new requirement for EVCPs under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country.

Active Design

28. Whilst the HBF considers it is appropriate to encourage sustainable modes of transport, the HBF does not consider that it would be appropriate for new housing developments to be required to provide a public transport pass. The HBF also does not consider that it would be appropriate for all new housing developments to provide new purpose-built

cycle storage, this may lead to the provision of unnecessary storage which is removed by the first purchasers, this would not be considered to be sustainable. The HBF does consider that the provision of cycle storage could be encouraged or supported along with other active design measures in a flexible policy, allowing the developer to choose the most appropriate approaches for their development.

Future Engagement

29. 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.

30. 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,

A handwritten signature in cursive script, appearing to read 'Joanne Harding', written in black ink.

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