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2<sup>nd</sup> June 2025

Dear Planning Policy Team,

## **HOMES SPACES PLACES TAMESIDE LOCAL PLAN: OPTIONS AND PREFERENCES**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Homes Spaces Places in Tameside 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.
3. The HBF notes that paragraph 234 of the 2024 NPPF states that *'for the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply: (c) the plan includes policies to deliver the level of housing and other development set out in a preceding local plan (such as a joint local plan containing strategic policies) adopted since 12 March 2020'*. It goes on to state that where paragraph 234(c) applies the plan will be examined under the relevant previous version of the Framework. The HBF notes that the Council is suggesting that this is the December 2023 Framework, which was the Framework which Places for Everyone was examined under.
4. We would like to submit the following comments upon selected policies within the Draft Local Plan 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 Tameside produces a sound local plan which provides appropriate policies for the area.

## **Plan Period**

5. The Plan Period is identified as 2022 to 2042. 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 into 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.

## **Vision and Objectives**

6. The Plan sets out the Places for Everyone (PfE) Vision and Objectives, and seeks to set a vision and objectives for Tameside. The vision proposes that Tameside in 2042 will be a place where people are proud to live, with a range of attractive and affordable homes that meet local needs. The objectives for Tameside include to ensure that new housing provides a range of suitable and affordable homes to meet residents' needs, whilst making efficient use of use of land.
7. The HBF considers that meeting the current and future housing needs should be a key part of the vision and objectives for the Plan. The HBF is concerned that the vision and objectives appear to focus on affordable housing rather than all housing needs, including market housing, family homes, homes for older people and homes for first-time buyers.

## **Policy Approach HSP S1: Overall Spatial Strategy**

8. The Plan provides a summary of the PfE spatial strategy, and identifies Tameside as being part of the 'Northern Areas' and as such subject to JP-Strat6. The proposed policy states that the Council intends to support sustainable growth, over the period 1 April 2022 to 31 March 2042 where provision will be made for at least 9,700 net additional dwellings. The policy goes on to suggest that it will deliver sustainable patterns of growth by maintaining a strong focus on making as much use as possible of suitable previously developed land and vacant buildings.
9. The PfE document identifies a housing requirement of a minimum of 8.245 net additional dwellings at an annual average of 485 dwellings per annum (dpa). This is stepped with 236dpa in the period 2022-25, 485dpa in the period 2025-30 and 568 in the period 2030-39. The Plan notes that the housing requirement will be 485dpa for the period 2039-42.
10. The HBF considers that the Council should plan for growth, this would be in line with the NPPF<sup>2</sup> which states that Plans should be prepared positively, in a way that is aspirational but deliverable. The HBF notes that the local housing need (LHN) as identified by the current standard method is 1,124dpa, this is an increase from the LHN identified under the previous standard method of 670dpa. The HBF does not consider that it is appropriate for the

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<sup>1</sup> NPPF December 2023 Paragraph 22

<sup>2</sup> NPPF December 2023 Paragraph 16

Local Plan to continue with the lower housing requirement from the Places for Everyone document post the end of the PfE Plan period. The HBF considers that at that point this Plan should revert to the figures identified by the Standard Method. The HBF considers that this would be in line with the NPPF seeking to Plan in a positive manner, and in line with the Building the Homes we Need Written Ministerial Statement in relation to taking the tough choices needed to improve affordability, turbo charge growth and build the 1.5 million homes the Government have committed to deliver.

11. Table 5.1 sets out the overall Tameside housing supply, this includes 1,110 completions, 7,848 dwellings on specific sites in the SHLAA, a 589 dwellings windfall allowance, and 536 dwellings to be completed on specific sites after 31 March 2039, this gives a total supply of 10,083 dwellings. The total housing requirement over the Plan period is identified as 9,700 dwellings. This current version of the Local Plan does not include any site allocations, the Plan suggests that these will be set out within the neighbourhoods' policies, along with criteria for their development. Two strategic allocations were made through Places for Everyone at Godley Green and South of Hyde.
12. The HBF considers that it is important that all the sites contained within the housing supply are deliverable over the plan period, planned to an appropriate strategy and do not create an over reliance on one location or type of property. The HBF would generally recommend that windfall allowances are not included in the supply and instead form part of the flexibility in supply. However, the HBF recommends that if the Council intends to include an allowance for windfall that they have an appropriate evidence base to support this, this would be in line with the NPPF<sup>3</sup> which states that where an allowance is made for windfall sites there should be compelling evidence that they will provide a reliable source of supply.

### **Policy approach HSP S2: Neighbourhood Spatial Policies**

13. The Council proposes to develop spatial policies to reflect the growth ambitions of the nine towns of Tameside. At present no details have been provided in relation to these policies or the potential allocations that may be included.
14. As set out above, the HBF considers that the Council will need to ensure that these Neighbourhood Spatial policies include an appropriate balance of development, to ensure that all of their housing needs are met in terms of types and tenures; locations and markets, and to ensure that the Plan can deliver against its housing requirements. The HBF believe that the Plan should provide for a wide range of sites across the Borough in order to provide competition and choice to ensure that housing needs are met in full. This sufficiency of housing land supply should ensure that the Council can meet the housing requirement, ensure the maintenance of a 5-year housing land supply and achieve the Housing Delivery Test. 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

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<sup>3</sup> NPPF December 2023 paragraph 72

market. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared.

15. The HBF also notes that the NPPF<sup>4</sup> requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved.

### **Policy approach HSP E2: Critical Drainage and Water Demand**

16. This policy approach suggests that the Council is considering the need for setting tighter water efficiency standards for residential development.
17. The HBF does not consider that it is necessary for development to adopt, measures to limit water usage including the implementation of the optional technical standards for water efficiency. The optional water standard is 110 litres per person per day, 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.
18. 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. PPG<sup>5</sup> 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*'. PPG<sup>6</sup> 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 Agency<sup>7</sup>. Therefore, the HBF considers that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need and should be deleted.

### **Policy approach HSP H1: Housing Type, Mix, Tenure and Affordability**

19. The Council proposes to bring forward policy to ensure that it maximises the delivery of additional affordable housing including setting a target for affordable housing.

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<sup>4</sup> NPPF December 2023 Paragraph 70

<sup>5</sup> PPG ID: 56-014-20150327

<sup>6</sup> PPG ID: 56-015-20150327

<sup>7</sup> 2021 Assessment of Water Stress Areas Update: <https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>

20. The HBF considers that it will be necessary to gather appropriate evidence including a housing needs assessment and a Viability Assessment to determine what types of homes may be needed and can be delivered in Tameside. The HBF considers this is likely to include a wide range and variety of homes from homes for first time buyers, to family homes to homes to suit the older population. The HBF would encourage the Council to work with the home building industry working in the area to determine the types of homes that are currently being delivered, and where there is demand from home purchasers.
21. 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<sup>8</sup>. 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.
22. The Council will seek to provide plots for custom, self-build and community-led housing.
23. The HBF would be keen to understand the evidence to support the need for custom, self-build and community-led housing in Tameside. The PPG<sup>9</sup> sets out how custom and self-build housing needs can be assessed. The PPG<sup>10</sup> also 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.
24. The Council also proposed to ensure that housing is provided to meet the needs of specific groups of people including but not limited to singles, couples, families with children and older people, including specialist housing.
25. The HBF notes that the NPPF<sup>11</sup> looks for local authorities to assess the need for different groups in the community including the size, type and tenure of housing, and to ensure this is reflected in planning policies. It goes on to suggest that these groups in the community include older people including those who require retirement housing, housing with care and care homes. The PPG<sup>12</sup> 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

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<sup>8</sup> NPPF December 2023 paragraphs 34, 63-66

<sup>9</sup> PPG ID: 67-003-20190722

<sup>10</sup> PPG ID: 57-025-20210508

<sup>11</sup> NPPF December 2023 paragraph 63

<sup>12</sup> PPG ID: 63-001-20190626

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 exists<sup>13</sup>. 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.

### **Policy approach HSP PE1: Development and Healthier Environments**

26. This policy approach suggests that the Council will define Health Improvement Zones and that development within these zones should be supported by Health Impact Assessment.
27. 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.
28. The PPG<sup>14</sup> 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. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, and it should set out measures to substantially mitigate the impact.

### **Policy approach HSP T9: EV Charging Infrastructure**

29. The Council proposes that the development of a network of electric vehicle charging points across Tameside will be implemented.
30. 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 in residential developments, including identifying where exceptions may apply. The HBF considers that it is important that the Council does not set its own standards for development which may differ from the approaches set out in other consenting regimes.

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<sup>13</sup> PPG ID: 63-006-20190626 & ID: 63-012-20190626

<sup>14</sup> PPG ID:53-005-20190722



## Monitoring

31. 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

32. The Council will also need to ensure that they have considered viability, viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative costs of all relevant policies will not undermine deliverability of the Plan. The Council need to ensure that policy requirements should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned development to be deliverable without need for further viability assessment at the decision-making stage.

## Future Engagement

33. 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.
34. 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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