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Sent by Email
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23/06/2025

Dear Planning Policy Team,

WIGAN LOCAL PLAN: INITIAL DRAFT FOR CONSULTATION – PLANNING FOR THE FUTURE

1. Thank you for consulting with the Home Builders Federation (HBF) on the Wigan Local Plan: Initial draft for consultation – Planning for the Future.
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.
4. The HBF also notes that the ‘Building the homes we need’ the Written Ministerial Statement (WMS) from Angela Raynor on 30th July 2024¹ highlights the importance of everyone local authority having a development plan in place, and states that for areas at an earlier stage of plan development should prepare plans against the revised version of the NPPF and progress as quickly as possible.
5. The HBF is keen to ensure that Wigan prepares a sound Local Plan that can be taken through to adoption and offers the following comments on the emerging Local Plan to help to create the most appropriate Plan.

Plan Period

6. The Plan Period appears to be 2022 to 2039. The NPPF² states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the

¹ <https://questions-statements.parliament.uk/written-statements/detail/2024-07-30/hcws48>

² NPPF December 2023 Paragraph 22

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 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 Strategic Objectives

- 7. The Vision states that by 2039 Wigan will be a place where people are proud to live, and where our housing offer is suitable, attractive and affordable, reflecting the needs of our population, and allowing them to live independently for longer. Objective 1 looks to deliver sufficient homes of the right type to meet the needs of our communities by working with developers, registered providers, landowners and other partners to support the delivery 16,627 new homes in the right locations by 2039, along with delivering the right mix of house types, tenures and sizes to meet the needs of our population including older people, disable people, care leavers and looked after children, and delivering the right amount of affordable housing to meet needs, prioritising homes for social rent.
- 8. The HBF generally agrees with these elements of the Vision and Objectives, it considers that meeting the current and future housing needs should be a key part of the vision and objectives for the Plan, this includes the housing needs for market housing, family homes, homes for older people and homes for first-time buyers.

Policy H1: Housing Delivery

- 9. This policy states that over the period 2022-2039 an average of 972 homes per annum should be provided in accordance with Policy JP-H1 of Place for Everyone (PfE). It goes on to state that the delivery of new housing will continue to be monitored annually to ensure that an adequate supply of new housing is provided at all times and to ensure that there is deliverable supply of housing sufficient to provide at least 5 years worth of new housing development.
- 10. Policy JP-H1 of the Places for Everyone (PfE) document identifies an annual average of around 10,305 dwellings to be delivered across the Greater Manchester authorities included in the Plan. The housing need as set out in the PfE was derived using the standard method that was current at the time. It states that the delivery rates identified in Table 7.2 are the minimum number of net additional dwellings each districted is expected to identify a sufficient supply of sites for, through their Local Plans. For Wigan Table 7.2 identifies a minimum net additional dwellings at an annual average of 972 dwellings per annum (dpa), this is stepped going from 814dpa (2022-2025), to 972dpa (2025-2030) to 1,025dpa (2030-2039) with a total of 16,527 dwellings over the Plan period.
- 11. The HBF considers that the Council should plan for growth, this would be in line with the NPPF³ which states that Plans should be prepared positively, in a way that is aspirational but deliverable. The HBF notes that the housing requirement in the PfE was derived from the standard method and was identified as a minimum housing need. Therefore, the HBF recommends that the Council considers whether it would be appropriate to Plan for a higher figure. This would be in line with the Governments ambitions as set out in the WMS⁴, the NPPF⁵ and the PPG⁶. The PPG states that the Government is committed to

³ NPPF December 2023 Paragraph 16
⁴ Building the Homes we need – Written Ministerial Statement 30th July 2024
⁵ NPPF December 2023 Paragraph 16 & 60
⁶ PPG 1D: 2a-010-20201216

ensuring that more homes are built and supports ambitious authorities who want to Plan for growth. The PPG suggests that there are circumstances where it is appropriate to Plan for a higher housing requirement than the local housing need identified by the standard method, these include where there are growth strategies for the area, where there are strategic infrastructure improvements, where an authority agrees to take on unmet need from neighbouring authorities, where previous levels of housing delivery in the area or previous assessments of need are significantly greater than the standard method.

12. The HBF notes that the proposed reasoning and explanation text highlights that despite the pandemic housing delivery has been strong in the period 2022-2024 with 2,554 net housing completions. We also note that the Governments data on net additional dwellings⁷ shows that over the last five years⁸ Wigan has delivered 6,551 dwellings, at an average of 1,310 dpa. This is significantly more than the housing requirement as set out in the PfE.
13. As set out above, the HBF considers that the Council should seek to extend the Plan period, and as such the HBF considers that the Council should seek to increase the housing requirement in the period post the PfE plan period to that set out in the standard method. The Government has updated the standard method and the calculation of housing need, and the current standard methodology would see the housing need for Wigan increase to 1,452dpa⁹. The HBF is also concerned that this is a significant step change, and that it would be sensible and beneficial for the Council to consider planning for this increase now, rather than leaving it until this higher requirement is part of the Housing Delivery Test calculation or five year housing land supply calculation.
14. Figure 5.2 within the Plan sets out the total housing supply over the plan period including 2,554 homes from completions 2022-2024; 2,199 homes from sites allocated in the PfE document; 4,295 homes from sites allocated in the Wigan Local Plan, 8,845 from large SHLAA sites; 253 homes from small SHLAA sites; and 540 homes from small sites windfall allowance.
15. The HBF considers that if the Council intends to include an allowance for windfalls of whatever size that they have an appropriate evidence base to support this, this would be in line with the NPPF¹⁰ 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.
16. The HBF considers that it is beneficial for the Council to include a level of flexibility in the supply. 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.
17. 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.

⁷ Live Table 122: Housing Supply; net additional dwellings by local authority <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

⁸ 2019/20 to 2023/24

⁹ 2024 stock: 152,961, 08%: 1,224, affordability ratio: 5.98, adjustment factor: 1.1862

¹⁰ NPPF December 2023 paragraph 72

18. It is important that housing delivery is effectively monitored so that if housing monitoring shows delays to housing delivery across Wigan action is taken to address this as soon as possible. The HBF suggests additional sites should be allocated so they that can be easily and quickly brought forward to address any under-delivery of housing supply. The Council will need to monitor the delivery of housing and publish progress against a published Housing Trajectory, Housing monitoring should be undertaken on a site-by-site basis.
19. The HBF also notes that the NPPF¹¹ 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. The HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have. The HBF would therefore wish to see the 10% small sites allowance delivered through allocations (and not windfall). Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%. The HBF also notes that support for small and medium builders need not be limited to only small sites of less than 1Ha. SMEs also deliver on other types of non-strategic sites (for example up to 100 units). The inclusion of additional non-strategic allocations would expand the range of choice in the market, and (possibly most importantly), be of a scale that can come forward and make a contribution to housing numbers earlier in the plan period.
20. The Plan’s policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver Wigan’s housing requirement. 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 market. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared.

Policy H2: Housing Mix

21. The HBF would start by saying that this policy contains numerous elements, which the HBF considers would be much better set as several separate policies. This would make the policy much more effective.

Density

22. This policy states that new residential development should be delivered at a density appropriate to its location in accordance with policy JP-H4 of the PfE Plan.

¹¹ NPPF 2024 Paragraph 73

23. The HBF notes that Policy JP-H4: Density of New Housing of the PfE states that new housing development should be delivered at a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport. It suggests that minimum densities range from 120 dwellings per hectare (dph) within 400m of rail stations and Metrolink stops and in designated town centres to 35dph in all other locations.
24. Therefore, the HBF does not consider that this element of the policy is required, and instead it would be beneficial to signpost to the PfE in relation to density requirements. Unless, the Council has more up to date evidence and wishes to provide a more up to date policy within its own Local Plan. If setting more detailed local policies the HBF considers that the setting of residential density standards should be undertaken in accordance with the NPPF¹² which looks for policies to optimise the use of land, and should include minimum density standards for town centres, and other locations that are well served by public transport.

Housing Mix

25. This policy states that new residential development should contribute to the provision of a mix of housing types, sizes and tenures across the borough to help address identified housing needs. The HBF notes that Policy JP-H3: Type, Size and Design of New Housing of the PfE document states that residential developments should provide an appropriate mix of dwelling types and sizes reflecting local plan policies.
26. At present the currently proposed policy adds little to what is already stated in the PfE document. Therefore, it is recommended the policy is either deleted or more guidance is provided by the policy. 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 local area. The HBF suggests that this policy could be improved by providing more indication of the needs of the area. However, the HBF also recommends a 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.

Affordable Housing

27. This policy states that developments of 10 homes or more will only be permitted where at least 25% of the homes are affordable, subject to viability, with a tenure split of 25% affordable home ownership and 75% for rent. Part 9 of the policy suggests that affordable homes for care leavers will be sought as part of section 106 agreements for affordable housing.
28. The HBF supports the need to address the affordable housing requirements of the borough. The NPPF¹³ 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.
29. The Council may also want to give more thought as to how they will work with developers and registered providers to provide homes appropriate for care leavers within this provision.

¹² NPPF December 2023 Paragraph 129

¹³ NPPF December 2023 Paragraph 34

Housing for older people

30. This policy states that developers of housing will be required to show how their site meets the needs of older people and people with disabilities. It goes on to state that on new build residential schemes of 20 homes or more a minimum of 4% of new homes should be wheelchair accessible (M4(3)), unless this is impracticable or is demonstrated to be unviable.
31. The HBF notes that Policy JP-H3: Type, Size and Design of New Housing of the PfE states that all new dwellings must be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations unless specific conditions make this impracticable.
32. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. The PPG¹⁴ 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 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 exists¹⁵. 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.
33. 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 PPG¹⁶ identifies the type of evidence required to introduce a policy seeking the use of the M4(3) standard, 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 Wigan 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.
34. The PPG¹⁷ 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, which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access can not be achieved or is not viable.
35. The HBF considers that if the Council has the evidence to introduce this policy, it may want to consider the most appropriate way to deliver the homes they require to meet their needs. The HBF considers that this may not always be in the form of M4(3) homes, and may need further consideration.

Self-build and Custom-build housing

¹⁴ PPG ID: 63-001-20190626

¹⁵ PPG ID: 63-006-20190626 & ID: 63-012-20190626

¹⁶ PPG ID: 56-007-20150327

¹⁷ PPG ID: 56-008-20160519

36. This policy states that the Council will work with developers to agree a sustainable approach to delivering self and custom build housing, where viable and appropriate subject to local demand as set out in the Council’s self-build register.
37. The HBF would be keen to understand the evidence to support the need for custom and self-build housing in Wigan, and how it has informed the proposed policy. The PPG¹⁸ 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 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 T3: Parking provision at new developments

38. This policy states that parking will be required in new developments and for material changes of use, in accordance with the standards set out at Appendix 2, this includes provision for EV Charging spaces, including 1 per dwelling.
39. 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.

Policy EN13: Water efficiency in new development

40. This policy states that all new residential developments must achieve, as a minimum, the water efficiency standard of 110 litres per person per day in line with the optional requirement in Building Regulations.
41. The HBF does not consider that it is necessary for development to adopt, as a minimum, 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.
42. 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. PPG¹⁹ 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’. PPG²⁰ 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

¹⁸ PPG ID: 57-025-20210508
¹⁹ PPG ID: 56-014-20150327
²⁰ PPG ID: 56-015-20150327

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 Wigan are not considered to be an area of Water Stress as identified by the Environment Agency²¹. 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.

Policy PE1: Planning for healthier living

43. Through either a Health Impact Assessment or a Planning for Health Checklist, applicants will need to demonstrate that due consideration has been given to the potential impact of the proposed development on the health and wellbeing of the population. The thresholds for requiring a Health Impact Assessment or a Planning for Health Checklist are 150 homes or more for a Health Impact Assessment and 10-149 homes for a Planning for Health Checklist.
44. 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.
45. The PPG²² 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 developments of 150 or more dwellings 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. The HBF also considers that this applies to the Planning for Health Checklist, and would query the need for such an assessment. The HBF considers that if this policy is to be retained, it should be clear that the evidence required should be proportionate to the application and the potential impacts.
46. The HBF recommend that this policy is amended to state that *‘where development proposals depart from the Plan and are likely to have a significant impact on the health and wellbeing of the local population they should be accompanied by a Health Impact Assessment or a Planning for Health Checklist dependent on the scale of the development. Applicants should demonstrate that due consideration has been given to the potential impact of the proposed development on the health and wellbeing of the population, based on the following topic areas, as applicable . . .’*

Policy PE4: Development and social infrastructure

²¹ 2021 Assessment of Water Stress Areas Update: <https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>

²² PPG ID:53-005-20190722

47. This policy states that development proposals for 10 or more new homes will be required to contribute financially towards addressing capacity issues arising from new development in health and social care, education, community facilities and open space, play, sport and recreation provision, to accommodate increased demands arising on such infrastructure. The policy requires a financial contribution from each new home (including the conversion of non-residential buildings to homes). The fee is set at £5,000, subject to viability, as at 1 April 2025, and will be reviewed and amended annually on 1 April in each subsequent year according to the official rate of UK inflation applying at that time. This will apply to the date that the first home on a site or agreed phase is occupied.
48. The HBF considers that it is not clear what the evidence is for this policy and why it is required and why the threshold proposed is appropriate, plans can only be considered to sound if they are justified and consistent with national policy. The NPPF²³ 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 HBF is concerned that at present there is not viability evidence to support this policy proposal, and as such it is important that there is an evidenced need and clear viability for this policy. As at present the HBF would argue that this policy requirement could undermine the delivery of the Plan.

Monitoring

49. The HBF recommends that the Council include an appropriate monitoring framework within their Local Plan 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.

Viability

50. The HBF has not been able to find an up-to-date Viability Assessment. The HBF considers that a viability assessment will need to be prepared to reflect the Plan policies and requirements and the current costs. Without this part of the evidence, the HBF is not able to comment on the deliverability of the policy requirements provided or the Local Plan overall.

Future Engagement

51. 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.
52. 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
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²³ NPPF 2021 paragraph 34

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