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Dear Sir/ Madam

**Tameside Local Plan (Homes, Spaces and Places) – Preferred Option Consultation Draft (Regulation 18)**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Tameside Local Plan (Homes, Spaces and Places) – Preferred Option Consultation Draft (Regulation 18).
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 multinational 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 in relation to the proposed policies and other key themes and areas. The HBF is keen to ensure that Tameside produces a sound Local Plan which provides appropriate policies for the area.

**Changes to National Planning Policy and Plan-Making System**

4. It is worth highlighting that in December 2025, the Government published a consultation on a new National Planning Policy Framework (NPPF). This followed a Written Ministerial Statement made on 27 November 2025 which outlined the Government's intention to move forward with a new plan-making system (reference: UIN HCWS1104). The move to a new plan-making system includes a series of transitional arrangements.
5. It is understood that currently, the Council is intending to use these transitional arrangements and submit its Local Plan for examination under the current plan-making regime. On this basis, paragraphs 4 and 8 in Annex A of the draft NPPF outline that the Local Plan will then be examined

under the current NPPF (December 2024). However, it is also notable that in relation to decision making, Annex A also states that from the date the new NPPF is published, Local Plan policies that are “...any way inconsistent with national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework”.

6. Consequently, in preparing the next iteration of this Local Plan, the Council may need to have regard to national policies for decision making, given that any inconsistency may effectively render policies in the Local Plan that are not consistent with the new NPPF redundant as soon as the Local Plan is adopted.

### **Plan Period**

7. It is noted that the Local Plan proposes a plan period from 2022 – 2042 (20 years). The Council will be aware that the NPPF makes clear that local planning authorities should, as a minimum, provide a 15 year plan period from adoption of a Local Plan (paragraph 22).
8. The Council’s most recent Local Development Scheme (LDS, March 2025) envisages adoption of the Local Plan by Autumn 2027. With this being the case, then the Local Plan from adoption will only have a plan period of 15 years. This leaves little in the way of contingency in the event that there are any delays in the plan’s preparation. As such, the Council should consider whether a further extension to the plan period is needed, so as to ensure that upon adoption, the Local Plan is consistent with paragraph 22 of the NPPF.

### **Spatial Vision**

9. The Spatial Vision contained in the Local Plan includes *inter alia* the aim that by 2042 that a range of attractive and affordable homes that meet local needs will be provided. The HBF broadly supports this but considers that the Council should give this a spatial dimension to say that a variety of sites will be provided in a variety of locations to meet this need.

### **Strategic Objectives**

10. The Strategic Objectives flow from the Local Plan’s Vision. In relation to homes specifically, reference is made to the provision of new housing in line with the requirement found in the Places for Everyone (PfE) document which is a strategic development plan document that covers nine of the local planning authorities in Greater Manchester. In line with our comments in relation to Policy HSP S1 below, the HBF considers that the Council should be looking to plan positively and go beyond the PfE requirement.

11. The Strategic Objective for homes also makes reference to making efficient use of land, buildings and previously developed sites. The HBF considers that whilst this should form part of the Council's strategy in the Local Plan, in order for it to meet its needs in full, the Council will need to consider a much wider variety of sites using a combination of brownfield and greenfield land. This needs to be reflected in the Strategic Objectives.

## **Spatial Framework**

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

12. This policy sets the overall approach to development in Tameside. In doing so it sets out the minimum number of new homes required in the Borough over the plan period, plus the overall strategy for where such homes should be located. We examine these issues below.

### **Number of New Homes**

13. The Local Plan sets out that the Borough will provide at least 9,700 net additional dwellings over the plan period 2022-2042. The explanatory text in the policy notes that this is based on the PfE average requirement of 485 dwellings per annum (Policy JP-H1). As the PfE plan period runs until 2039, the Local Plan then effectively 'rolls forward' the annual requirement to 2042.
14. The Council will be aware that since the adoption of the PfE in March 2024, the Government has stated its commitment to develop 1.5 million new homes over this parliament. This has been reinforced by a Written Ministerial Statement (WMS) made on 30 July (Building the homes we need, reference: UIN HCWS48) and has resulted in the Government adopting a new Standard Method for calculating Local Housing Need (LHN) with the NPPF outlining that this should be the minimum figure that local planning authorities should plan for in their Local Plans (paragraph 62). For Tameside, its LHN is 1,130 dwellings per annum which is substantially above that expressed in the PfE and applied to the whole plan period, would mean that the Council should be planning for at least 22,600 dwellings (2022-2042).
15. In acknowledgement of the WMS and the Government's intention to address the chronic shortfall in housing delivery across the country, the HBF considers that notwithstanding the PfE, the Council should be doing more to align the Local Plan with the current LHN so that the Council plays its role in contributing to the Government's goal in the delivery of 1.5 million new homes this parliament and for planning positively for growth. Indeed, as the PfE figure is expressed as a minimum, setting a higher figure in the Local Plan than that found in the PfE does not necessarily in itself present a planning policy conflict and at the same time, it will allow the Council to 'significantly boost' the supply of new homes, as instructed by the NPPF (paragraph 61).

16. The PfE highlights that the annual average figure for 2022 to 2039 in policy JP-H1 Table 7.2 should be treated as a minimum requirement for each year after 2039 when local planning authorities are undertaking their own Local Plans. The Council has sought to undertake this exercise to allow the housing requirement to be extended up to 2042 (see Table 5.0 of the Local Plan). However, in light of the new Standard Method (which post-dates the PfE), the HBF considers it would be beneficial over this period for the Council to be using the per annum LHN figure derived from the Standard Method.

## **Distribution of Homes**

17. The policy seeks to align the strategy for growth with that found in the PfE (namely Policies JP-S1 and JP-H4). The HBF considers this is a reasonable basis for the spatial strategy in the emerging Local Plan, however in translating this to the local level, the Council will need to ensure that this meets the needs of all communities within Tameside and that local circumstances are appropriately taken into account. This should include identifying (and allocating) 10% of the plan's housing requirement to small sites (see paragraph 73 of the NPPF). This is important to allow small and medium house builders to develop in the Borough and giving them the certainty that their sites can be delivered.
18. Alongside this, if the Council is to seek to better align with its current LHN, it will need to identify further allocations within the Borough. This may require the need to examine other brownfield opportunities alongside greenfield sites and also to consider whether changes to its Green Belt boundary should be considered to accommodate this growth. As such, the Council may need to consider whether certain criteria in the policy require amending, such as that which relates to Green Belt (criterion o).

## **Environment**

### **Policy HSP E1: Renewable and Low Carbon Energy**

19. The HBF supports the need for new development to reduce carbon and to be more energy efficient. To this end, the industry has been working positively to ensure that it aligns with the Government's climate change targets. The HBF therefore continues to recognise the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. This is in line with the WMS of December 2023 (reference: UIN HCWS123), which states that the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations.

20. The Council has referenced PfE Policy JP-S2 in its explanatory text (paragraph 7.16), and it is noted that the policy was set prior to the WMS being made and, in any event, seeks that development is brought forward according to current building regulations. As such, the HBF seeks assurances that this is the case and that the Council is not intending to set its own local standards.

## **Policy HSP E2: Surface Water and Water Efficiency**

21. This policy *inter alia* includes a requirement for new development to meet the optional tighter water efficiency standard outlined in Part G of the building regulations (110 litres/person/day). Whilst the Planning Practice Guidance (PPG) allows for this, it is on the basis that the Council provides justification and evidence, consults with the local water company, Environment Agency and catchment partnerships, and considers the impact on viability and housing supply of such a requirement (Reference ID: 56-015-20150327).
22. The PPG provides further advice on the evidence required which includes:
- The Environment Agency water stressed areas 2021 classification, which identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.
  - Water resource management plans produced by water companies.
  - River Basin Management Plans which describe the river basin district and the pressure that the water environment faces. These include information on where water resources are contributing to a water body being classified as ‘at risk’ or ‘probably at risk’ of failing to achieve good ecological status, due to low flows or reduced water availability.
23. Whilst the current evidence base does include United Utilities’ Water Resource Management Plan (December 2024), this notes that there are notable leaks in the current network that need addressing. Furthermore, the region is envisaged to be a net exporter of water to other regions in the future, which should not be the case if the area is lacking in future water supply. Indeed, the 2021 classification referenced above indicates that the North West is not in an area of water stress and so this would indicate that the justification to move to the tighter water standards is not there.

## **Homes**

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

24. The HBF supports the need to ensure the homes that are built over the plan period meet the needs of Tameside’s communities, however a policy which is overly prescriptive in the house type and sizes required will likely frustrate delivery rather than facilitate it. This is because whilst need is

an important factor, the type and mix of homes also depends on the location and character of an area plus commercial, market and viability considerations.

25. The HBF therefore broadly supports point 2 of the policy which seeks to map out site specific circumstances where deviation from the mix provided in Table 8.0 of the Local Plan is permitted. We would seek that this also includes market considerations alongside viability, as it is also important that our Members are able to build to reflect the aspirations and demands of the market which may differ from the needs expressed in the Council's Housing Needs Assessment (HNA, 2025).

### **Policy HSP H2: Meeting Affordable Housing Needs**

26. This policy requires the following affordable housing contributions on schemes of over 10 new homes:
  - At least 15% of the total number of homes as affordable housing.
  - At least 50% of the total number of homes as affordable housing when located on sites in the Green Belt.
27. The HBF supports the need to ensure that as part of a wider mix of new homes, that an appropriate number of affordable homes are offered. The NPPF is clear that when considering an appropriate affordable housing contribution, the Council should also consider viability implications (paragraph 35) to ensure that the requirement does not undermine the deliverability of the plan. As such, the Council will need to commission a whole plan viability assessment to justify the approach in Policy HSP H2.
28. Whilst the HBF notes that the policy allows individual applicants to submit viability assessments where they consider providing the full affordable housing requirement will cause viability issues, this clearly needs to be the exception and not the rule. The delivery of homes shouldn't be frustrated and delayed because the affordable housing policy has not been set correctly. Overage clauses are also proposed in Section 106 agreements so as to consider if any viability issues are resolved over the lifetime of the delivery of the site. The HBF would consider that if this is the case, the Council should take a pro-active and pragmatic approach if the opposite takes place and the viability position worsens, so that stalled housing sites are avoided.
29. The HNA currently notes that the annual affordable housing need is 717 dwellings per annum (Table C8) which is a substantial portion of the Council's LHN (and exceeds the PfE requirement). In these situations, the PPG advises that local planning authorities should consider an uplift in their overall housing requirement to help boost the supply of affordable homes (Reference ID: 2a-024-20190220). It should also be noted that the current unmet need is envisaged to

be cleared over a 10 year period, which the HBF considers should be 5 years, given that this is need not being met now (rather than newly arising need). This would suggest the annual affordable need is being underestimated by the HNA.

30. The policy also sets out a proposed tenure split for affordable homes of 60% social rented, 15% affordable rented and 25% affordable home ownership. Whilst the policy helpfully sets out some exemptions to this tenure split, the HBF would seek further flexibility in the event that a Registered Provider cannot be identified to take the social rented or affordable rented properties (given that these would form a substantial part of the affordable mix). This would allow other affordable tenures to be considered and ensure that the delivery of much needed new homes is not delayed.
31. Table 8.1 of the Local Plan sets out a detailed matrix of house type, size and tenure which the Council is seeking from development sites. Whilst helpful, in a similar manner to our comments in relation to Policy HSP H1, there needs to be some flexibility built into the policy to take into account factors such as location, character, design and viability and any site-specific constraints. Similarly, the policy should avoid being overly prescriptive on tenure as this will depend on the requirements of the Registered Providers at the time. We therefore consider Table 8.1 should act as an indicative guide so as to allow flexibility for the reasons outlined above.
32. A distinction between on-site and off-site affordable housing provision is made within the policy. Whilst this seeks to reflect the current NPPF, it is worth noting that the draft emerging NPPF (from December 2025) may facilitate a greater degree of monetary contribution in lieu of direct on site delivery for small and medium sized sites. Given our comments in paragraphs 4 – 6 of these representations, this part of the policy may need to be revisited later in the plan's preparation.

### **Policy HSP H3: Meeting Specific Housing Needs**

33. The HBF is generally supportive of providing homes that are suitable to meet the needs of older and vulnerable people. Whilst there is general support for such development, the HBF would however recommend that the Council should be more proactive in working with providers of this type of development. This approach would provide far more certainty to the Council that the need for such accommodation will be met in full. The HBF considers that the Council should note the difference between homes suitable for older people and specialist housing for older people, and the difference in need and demand for these types of homes.
34. This approach is consistent with the PPG which notes that allocating such sites can provide greater certainty for developers and encourage the provision of sites in suitable locations (Reference ID: 63-012-20190626). Often such developments have their own specific locational requirements which are different to general needs housing. Such developments also often have their own

viability considerations which should be reflected in the whole plan viability assessment, with then separate policy requirements to reflect these differences.

35. This policy also requires that 5% of new homes meet the optional building regulation Part M4(3) standards. It is unclear whether the Council intends this standard to be wheelchair accessible or adaptable. This will require clarification. If M4(3) dwellings are to be requested, then the Council will need to justify this by reference to the policy tests outlined in the PPG. This includes 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 (Reference ID: 56-007-20150327).
36. Currently, whilst some information is provided in the HNA, the HBF does not consider that is sufficient to justify a requirement for M4(3) dwellings.
37. This policy also sets out the Council's approach to self-build and custom-build homes. To facilitate such development, it is proposed to:
  - Favourably consider applications for custom, self build and community-led housing where this is consistent with other policies within the development plan.
  - Encourage developers of larger sites to make plots available for custom, self-build and community-led housing as part of their development, having regard to evidence of local need and the nature of the development proposed.
38. There is then however a disconnect between these requirements which facilitate and encourage self and custom build homes and the remaining policy text which states:

*“Where it can be demonstrated that there is no demand for the provision of self-build plots after having been made available in serviced form at a realistic price and marketed appropriately over a continual 6-month period, consideration will be given to these plots being provided as shell homes or affordable housing in the first instance, or the developer’s standard product as a last resort.”*
39. This requirement seems much more onerous than merely facilitating and encouraging such development and is not a requirement supported by the HBF. Firstly, the demand is extremely limited with only 8 people on the Council's register (outlined in the HNA, paragraph 4.43) and so this would not justify self and custom build plots being required on larger (undefined) development sites. Secondly, the policy ignores the fact that it is unlikely that the provision of such plots on new housing developments can be co-ordinated with the development of a wider site. At any one time, there are often multiple contractors and large machinery operating on-site and therefore from both a practical and health and safety perspective, it is difficult to envisage the development

of single plots by individuals operating alongside this construction activity. For self-build in particular, the HBF also notes that many would prefer not to be on a large residential development.

40. As such, the HBF would advocate for a policy which is less onerous and instead seeks to encourage the development of specific self and custom build sites where there is a demand for such homes.

## People

### Policy HSP PE1: Development and Healthier Environments

41. Building upon PFE Policy JP-P6, this policy requires all developments over 100 dwellings to be supported by a comprehensive Health Impact Assessment (HIA).
42. The HBF generally supports plans that set out how the Council will achieve improvements in health and well-being. The PPG 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 (Reference ID: 53-005-20190722).
43. 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.
44. In addition, the HBF considers that any requirement for a HIA should be based on a proportionate level of detail in relation to the scale and type of development proposed. The requirement for a HIA for all 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 then sets out measures to mitigate the impact. Any requirement for a HIA will also need to be reflected in the whole-plan viability assessment.

## Travel

### Policy HSP T9: EV Charging Infrastructure

45. This policy outlines that applicants should have regard to the Council's Electric Vehicle Strategy when designing their schemes. For new development the Council will be aware that requirements

for electric charging infrastructure are set out in Part S of building regulations. This provides the national standard which local planning authorities are to follow. As such, references to the Council's Electric Vehicle Strategy in relation to new development are superfluous. This should be clarified in the policy wording.

## Places

### Policy HSP PL8: Design and Amenity

46. The HBF is supportive of well design places and considers that this is an important element of creating sustainable and attractive developments. To this end, the overall principle of the policy is supported, however there are portions of the policy which seem to repeat requirements found elsewhere in the Local Plan. Given that the NPPF is clear in paragraph 16 that such repetition should be avoided, some of the wording may need to be deleted or reworded.
47. The policy wording also makes reference to a number of guidance documents such as a forthcoming Character and Design Assessment and Streets for All. As these are not development plan documents, it is inappropriate for the policy to require compliance with such documents. The Council should therefore ensure that where such documents are referred to in the policy text that the requirement is to 'have regard to' them rather than requiring compliance with them.

### Policy HSP PL13: Design of Public Realm and Urban Spaces

48. In a similar manner to Policy HSP PL8, the HBF supports the overall principle of this policy. Nevertheless, we consider some of the wording requires revisiting to ensure soundness and flexibility in future drafts.
49. The policy itself requires applicants to incorporate the principles outlined in the Greater Manchester Streets for All Design Guidance. As outlined in relation to Policy HSP PL8, the Streets for All document is not a development plan document and so it is not appropriate for Policy HSP PL13 to require compliance with it. The wording therefore needs to change so that applicants should 'have regard to' the document.
50. Part 5 of the policy seeks alignment with PfE Policy JP-G7 in relation to trees and seeks street trees where appropriate and needed. This is generally supported as it is a requirement found in paragraph 136 of the NPPF. However, this requirement should also cross reference the footnote that goes alongside this (footnote 52) which explains street trees are not required where there are justifiable and compelling reasons. The policy wording needs to be amended to reflect this.

## Monitoring Framework

51. The Monitoring Framework is found in Appendix F and seeks to link the Visions and Objectives contained in the Local Plan to the relevant indicators. For the Monitoring Framework to be effective, the HBF recommends that the Council provides 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 by the Monitoring Framework. Currently this detail is lacking.

### **Future Engagement**

52. The HBF trusts that the Council will find these comments useful as it continues to progress its Local Plan. We would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

53. 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 faithfully,

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