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To Whom It May Concern

Taylor Wimpey UK Limited: Representations to the Tameside Homes, Spaces, Places Options and Preferences Plan Consultation

Introduction

These representations have been prepared on behalf of our client, Taylor Wimpey UK Limited [Taylor Wimpey], in relation to the Tameside Homes, Spaces, Places Options and Preferences Plan [Options and Preferences Plan] Consultation.

These representations have been prepared in the context of Taylor Wimpey's land interest in Tameside, namely land at Lumb Lane, Littlemoss (the Site). The Site extends to 30.9 hectares and has the capacity to deliver approximately 640 new homes including affordable housing to meet local housing needs. Previous representations were submitted in September 2024 to the Homes, Spaces, Places Scoping Consultation. A Call for Sites submission was also submitted alongside the Scoping Consultation representations. The submission was accompanied by a Delivery Statement which demonstrated the suitability of the site to provide a sustainable residential extension to Droylsden.

The site previously formed part of a wider allocation in the original Greater Manchester Spatial Framework [GMSF] (2016) (ref. EG1 Little Moss/Ashton Moss) for a sustainable mixed use development for 1,980 homes. Taylor Wimpey has a committed land interest in the Site and considers that the Site represents an excellent opportunity for an allocation for residential development through the emerging Local Plan.

The Options and Preferences Plan builds on the previous Scoping Consultation and provides a more detailed set of locally specific planning policies to guide development within the Borough. However, Taylor Wimpey does not provide detailed responses to the draft policies as part of these representations and reserve the opportunity to comment on these policies at Regulation 19 Publication Stage.

Instead, these representations focus primarily on the approach proposed by Tameside Council regarding the release of land for housing in the emerging Plan, the lack of additional sites identified for

housing development, and the relationship between the emerging Tameside Local Plan and the adopted Places for Everyone Plan [Pfe] (adopted March 2024).

Homes, Spaces, Places Options and Preferences Plan Consultation

Relationship with Places for Everyone Plan

Following the adoption of the Pfe Plan in March 2024, there is now a requirement on Tameside to produce and adopt a Plan which sits alongside and complements the Pfe Plan. The Plan also needs to deal with a number of issues not covered by the strategic Pfe Plan. The Inspectors' Report accompanying the Pfe is clear (para. 14 and 15) that each LPA is required to prepare a new Local Plan within the context of the strategic policies set out in the Pfe. Furthermore, the claimed supply within the Pfe is untested and is likely to be less developable than envisaged in our opinion. This was highlighted by Taylor Wimpey (as part of a Consortium of housebuilders) during preparation of the Pfe. The Consortium undertook a detailed analysis of a proportion of the claimed housing land supply across several Greater Manchester Boroughs, which highlighted the lack of evidence and justification provided for a significant number of sites which formed part of the claimed supply. Furthermore, as the plan period for the emerging Local Plan needs to be extended, there is insufficient supply in Tameside to ensure that all housing needs can be met over this period. This will therefore need to be adequately addressed in the emerging Tameside Local Plan.

Taylor Wimpey supports the Council commencing a new Local Plan for the Borough shortly after adoption of the Pfe and considers that the Plan should be progressed quickly to ensure opportunities for much needed new development across the Borough are plan-led and can be fully realised. However, it is noted that the Options and Preferences Plan states *"having regard to the NPPF and noting that Tameside's Green Belt has been altered only very recently through Pfe, Homes, Spaces, Places does not intend to undertake a further strategic review of the borough's Green Belt"* [paragraph 1.28]. This was not the approach that was expected through a Part 2 plan following the adoption of the Pfe, and this approach will clearly have implications for the further release of land for housing in the Borough. Release of land from the Green Belt through the Pfe should not be seen as a one off event, or be seen to provide each LPA with an ability to resist further Green Belt release where it is required.

These representations are formed bearing in mind the content of the Pfe and the Inspectors' Report associated with the Examination of the Pfe (14th February 2024). The Inspector's Report outlines the role of the Pfe and its relationship with subsequent individual district local plans. The Pfe noted that its key role was to plan to identify housing, office, industrial and warehousing development need and thematic policies to accommodate and inform that development, alongside the allocation of large sites outside the urban area to help meet development needs. Paragraphs 14 – 16 of the Inspectors' Report are of key significance in the consideration of the relationship between Pfe and local plans, and state the following ***[Lichfield's emphasis in bold]***:

*14. - 'Each of the nine local planning authorities covered by the Plan has an existing local plan; those were adopted at various times between 1997 and 2023. Each authority is committed to preparing a new local plan within the context of the strategic policies for the city region set out in the Plan. **Those local plans will, amongst other things, identify a supply of housing sites (in addition to the allocations in the Plan) to ensure that the minimum housing requirement for each district set out in the Plan can***

***be met**, looking ahead a minimum period from their adoption date as required by national policy. Similarly, local plans will, where necessary, allocate sites for industrial, warehouse and office developments in addition to the employment allocations in the Plan.*

15. - In other words, it is not the role of the Plan alone to identify sufficient land to ensure that all objectively assessed needs for housing and other uses can be met, as much of the supply will be brought forward through local plans. Nor is it the role of the Plan to address all strategic and other priorities in all districts, as local plans will be able to contain strategic and non-strategic policies, provided that they are consistent with the Plan and with national policy.

16. - In the context of the above, each of the nine authority's local plan will be essential to ensure that sufficient land is identified to allow development needs, including those set out in the Plan, to be met in a timely and plan-led manner. However, our role is to determine if the Plan before us is legally compliant and sound, and it is not necessary to recommend a modification to specify when each local plan should be prepared. This is because national policy requires local plans to be reviewed and kept up to date, and the scope and timing of each local plan must be set out in each authority's local development scheme. Furthermore, we are not convinced that setting a timetable for the preparation of local plans would be effective as each authority would still be individually responsible for carrying out the necessary work to prepare its local plan.

Furthermore, para. 1.56 of the PfE states that *"The Places for Everyone Plan is the strategic spatial plan for our nine boroughs and as such sets out our planning policy framework. All policies within the plan are "strategic policies". It is being prepared as a Joint Development Plan Document of the nine local planning authorities. Once the Places for Everyone Plan is adopted it will form part of the relevant authority's development plan. As such local plans will need to be consistent with it and neighbourhood plans will need to be in general conformity with the strategic policies. Local plans will be expected to look ahead a minimum period from their adoption, in line with national policy. In the event that a local plan looks beyond 2039, the minimum requirement figures set out in Policies JP-J3, JPJ4 and JP-H1 should be used to inform local plan target(s)."*

Footnote 2 states that in the event that a local plan looks ahead beyond 2039, the annual average figure 2022-2039 in policy JP-H1 Table 7.2 should be treated as a minimum requirement for each year after 2039.

Housing Requirement

The PfE allocated large scale strategic residential sites across Greater Manchester, including sites in Tameside. As part of the preparation of the PfE document, each Greater Manchester Borough also identified a supply of land for residential development to cover the upcoming plan period. This is set out in Policy JP-H1 (Scale, Distribution and Phasing of New Housing Development). This sets out that a minimum of 175,185 net additional dwellings will be delivered over the period 2022-2039, or an annual average of around 10,305. The total requirement for Tameside for the period 2022-2039 is 8,245 dwellings, an annual average of 485 dpa. This comprises a stepped requirement as follows:

- 2022- 2025 (annual) – 236 dpa

- 2025- 2030 (annual) – 485 dpa
- 2030-2039 (annual) – 568 dpa

Whilst the approach taken to utilise the average figure for Tameside’s housing requirement within PfE is consistent with the Inspectors’ recommendation from the examination, this also should be considered in the context of Tameside’s recently increased Local Housing Need [LHN] calculated using the Government’s Standard Method (SM3). Based on affordability ratios published in March 2025 and the updated Housing Stock figures published in May 2025, Tameside’s SM3 figure is now 1,132 dpa, 647 dwellings above the adopted annual average requirement of 485 for the period 2025-2030. From 2030-2039, this represents an increase of 564 dwellings per annum. From 22nd March 2029 onwards (when the PfE will be five years from adoption and therefore out of date), the LHN will apply and the housing requirement for Tameside will increase significantly.

Over the five year period from 2029-2034, Tameside’s housing requirement will be 5,943 (based on current SM3 figure plus a 5% buffer in accordance with NPPF para. 78). It will be highly likely at this stage that the Council will struggle to identify a sufficient supply of land and will be unable to demonstrate a Five-Year Housing Land Supply from 2029 onwards. As such, Tameside must take positive steps now towards meeting a significantly increased housing requirement from March 2029 onwards.

It is therefore imperative that the Council put steps in place now to ensure plan led development rather than being subjected to speculative applications in 2029 when the higher housing requirement becomes mandatory. Waiting until 2029 to proactively identify land to meet this higher housing requirement will be too late, and the Council should plan through the emerging Tameside Local Plan to address this. On this basis, it would be more appropriate for Tameside to plan for their actual housing need rather than for the minimum amount of growth in the short term, and the Council should therefore review its housing land supply in this context.

Furthermore, it is highly unlikely that Tameside would be able to redistribute any of its housing requirement across other Greater Manchester Borough’s through a potential review of the PfE in 2029, as the LHN for all other Borough’s has significantly increased based on SM3. It is therefore highly likely that Tameside will be required to meet its LHN in full, placing further pressure on the requirement to identify additional housing land.

Housing Land Supply

The Options and Preferences Plan does not seek to make any allocations in addition to PfE to meet the Borough’s housing requirement. At the outset, it is important to reiterate that the PfE Inspectors did not review or endorse the claimed supply positions for each LPA. With this in mind, as per the Inspectors’ Report on the examination of PfE, it is the role of the Local Plan to identify a supply of housing sites (para. 14), and the Local Plan will be essential to ensure that sufficient land is identified to allow development needs, including those set out in the Plan, to be met in a timely and plan-led manner (para. 17).

In terms of supply, PfE Table 7.1 summarises the sources of housing land supply up to 2039 for each GM Borough. The position for Tameside is set out below in Table 1.

Table 1 Tameside sources of housing land supply 2022-2039

District	SHLAA – Brownfield Land	SHLAA – Greenfield Land	SHLAA - Mix	Allowances	PfE Allocations	2022-2039 Land Supply
Tameside	5,127	714	455	562	1,894	8,752

Source: PfE Table 7.1

The Tameside Strategic Housing and Economic Land Availability Assessment 2024 – 2039 [SHELAA] provides the supporting evidence for the housing land supply set out in Table 1 and sets out the Council’s supply of land for housing for the period 1 April 2024 to 31 March 2039. The potential supply set out in the SHELAA is 8,299 net additional dwellings for the 15-year period, which the SHELAA states is adequate to meet the housing requirement over this period.

As set out above, individual sites included in Table 7.1 of the PfE and the Council’s SHELAA were not assessed by the Inspector during examination of the PfE, and the supply in Tameside was therefore not endorsed by the Inspector. Taylor Wimpey has significant concerns that a large proportion of the claimed developable supply set out in Table 1 may not be developable, and the evidence put forward by the Council to justify the supply has not been independently scrutinised.

A list of the sites which make up the Council’s 2024-2039 housing land supply is set out in Appendix 2 of the SHELAA. The information provided for each site as part of this list is limited and provides very little information to justify the inclusion of sites or to demonstrate their deliverability and developability. The level of detail within the SHELAA for each of the proposed sites is limited and insufficient to appropriately justify the expected level of completions within the Borough and to demonstrate their developability in the context of the NPPF.

For all sites without planning permission, Taylor Wimpey would expect a level of information to be supplied which justifies the site’s inclusion. This could include information from developers and landowners demonstrating their site is available as well as other technical information to demonstrate there are no substantive issues precluding its delivery and justification for the claimed capacity for the site. This level of information has not been provided on the majority of the sites included in the supply.

The NPPF is clear that for a site to be included in the trajectory for a plan it should be a suitable location for housing, with reasonable prospects that it will be available and viable at the point envisaged. However, in the opinion of Taylor Wimpey, insufficient information has been included to explain and substantiate the rationale behind including the sites. As a minimum, Taylor Wimpey would have expected information to be provided in the form of a proforma which justified the potential yield from each site, information to demonstrate a suitable lead in time has been applied and information to demonstrate the site is available to be delivered at the point envisaged. As a result, Taylor Wimpey considers that the SHELAA is not sufficiently transparent or robust and additional evidence is required to be published as a minimum.

Based on a high level review of the Council’s identified supply, it is also clear that there is a significant reliance on brownfield land to meet housing needs. Brownfield or previously developed land can be subject to significant deliverability and viability issues, due to factors such as land contamination and remediation costs, fragmented landownership and other physical and environmental constraints.

Viability is a key issue in Tameside and particularly relating to the delivery of brownfield sites. The evidence put forward on viability to the PfE demonstrated that 70% of the claimed supply was unviable even without a requirement to delivery affordable housing.

Reliance on sites contained within the SHLAA, particularly brownfield land, is significantly concerning given the likely deliverability issues and the failure to demonstrate that the SHELAA sites have been robustly tested. As such, reliance on the allocated sites contained within PfE, supplemented with untested SHELAA sites to ensure that all objectively assessed needs for housing and other uses can be met, is inappropriate and unjustified.

The Inspectors' report makes it clear that the individual district Local Plans will need to identify additional sites to meet a district's full need and this could include the release of further land from the Green Belt. The Options and Preferences Plan does not identify any land for housing and does not include draft housing allocations. As such, Taylor Wimpey has reservations that the Council's housing land supply will deliver the requisite amount of housing required in the Borough to ensure the needs of the population are met, particularly when considering the significant increase in the Borough's housing requirement in March 2029. It is therefore important that a new Local Plan identifies additional land across the Borough, with a sufficient supply of unconstrained greenfield land, which can be assessed and scrutinised as part of the preparation of the Local Plan.

As part of this process, the Council should also undertake a full Green Belt review. NPPF para. 148 states that where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. As it is considered that there is insufficient previously developed land within the authority, the Council must look to grey belt sites in the Borough in order to meet needs. The Green Belt review should seek to identify the best grey belt sites in Tameside and these should be considered for allocation. Taylor Wimpey considers that the Lumb Lane site meets the grey belt definition and represents a good grey belt site. The site should therefore be considered as a grey belt site as part of a Green Belt review process.

The allocation of additional housing land in the Local Plan will help to ensure that some of the key housing related challenges facing the Borough can be addressed over the next plan period, and a full Green Belt review will be an important part of this process.

Affordable Housing Provision

Taylor Wimpey is aware that Tameside has one of the highest affordable housing needs across Greater Manchester and a relatively high affordability ratio (6.99¹). Taylor Wimpey considers that a primary method of ensuring affordability issues is addressed is the delivery of a sufficient amount of market and affordable housing which meets the needs of the Borough. The allocation of sustainable and viable sites for residential development will assist with this.

The Lumb Lane site has the potential to deliver approximately 640 dwellings and will also make a significant contribution to meeting market and affordable housing need in Tameside to meet the needs of the local community. The site will provide a significant proportion of affordable housing in

¹ Median workplace based affordability ratio for 2023

accordance with the Council's affordable housing requirements which is still to be established. However, it is also important that the new Local Plan does not introduce any additional policy burdens which may negatively impact the viability position of the Site. This could have the result of reducing the amount of affordable housing that could be delivered on the Site. As the Local Plan progresses, it needs to be cognisant of the viability work already undertaken and any updates which may follow.

Furthermore, it is considered that brownfield sites tend to suffer from additional constraints which can impact the viability and deliverability of residential development on these sites. It is considered that relying too heavily on brownfield land to deliver housing within Tameside could result in a deliverability issue over the plan period. The Council should therefore ensure that an appropriate amount of housing land is identified and allocated in greenfield locations where there are fewer constraints and viability issues are less prevalent, such as the Lumb Lane site whereby there are no significant physical constraints precluding development.

Conclusion

Taylor Wimpey supports the Council commencing preparation of a new Local Plan for Tameside, which provides an excellent opportunity to allocate new sites for housing development to assist in meeting the Borough's housing needs. However, the Council must ensure that the new Local Plan fully aligns with the strategic priorities of the GMCA and the PfE Plan.

At present, it is considered that there is limited evidence available for the deliverability of sites within the plan period. As the supply was not tested though the examination of PfE, unblinkered reliance on this is flawed and Taylor Wimpey will be challenging the claimed supply position should the Council continue to rely on it as the Plan progresses to Examination. The Council should therefore seek to allocate sufficient sites within the emerging Tameside Local Plan to ensure that the Council is able to meet their housing requirement rather than relying on an untested SHELAA supply.

In its current form, the Options and Preferences Plan provides no certainty the Council will be able to meet its housing requirement once the LHN applies and Tameside's housing requirement increases significantly from March 2029 onwards. It is therefore important that the Council plans proactively and a new Local Plan should identify additional land across the Borough which can be assessed and scrutinised as part of the preparation of the Local Plan. A full Green Belt review should also be undertaken to support this. The Green Belt review should seek to identify the best grey belt sites in Tameside and these should be considered for allocation.

In line with the Inspectors' Report on the examination of PfE, it is explicitly stated that it is the role of subsequent local plans to identify a supply of housing sites (para. 14) and ensure that sufficient land is identified to allow development needs to be met in a timely and plan-led manner (para. 18). The lack of allocations within the draft Local Plan directly conflicts with the examination of PfE and undermines the relationship with the joint plan. In its current form, there are significant questions as to whether the draft Local Plan would facilitate the necessary development in Tameside.

In addition, there are significant viability concerns given the clear overreliance on brownfield land to meet requirements. The viability implications within the draft Local Plan must also be tested to ensure that the policies are realistic and will not undermine the delivery of new development within the Borough.

Should the Council seek to continue with the Local Plan without allocating additional sites for development, Taylor Wimpey will look to review the entirety of the Council's identified supply within the SHELAA and will submit further representations at each future stage of the plan making process.

Regarding the above concerns, Taylor Wimpey has a committed land interest in the Lumb Lane site and considers that it presents an excellent opportunity for an allocation for residential development through the emerging Local Plan. The site has the ability to provide a significant source of developable supply, which will provide a valuable contribution to assist the Council in meeting its housing needs over the medium to long term.

Taylor Wimpey would welcome the opportunity to work collaboratively with the Council to bring the site forward for development and ensure that sufficient supply is identified through the emerging plan.

We trust that these representations will be fully considered in the formulation of a new Local Plan and we would be grateful if you could keep us informed as to the details of the next stage of consultation.

Yours faithfully

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Brian O'Connor

Senior Director

BA (Hons) MPlan MAELAM MRTPI