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Chris Martin – Homes Builders Federation (HBF)
Oldham Local Plan Examination
Matters, Issues and Questions – Matter 7

Matter 7 – Transport Policies

Issue 11: Does the Plan set out a positively prepared strategy and policies (Policies T1 to T5) for transport which is justified, effective and consistent with national policy?

Policy T1

Q7.1 Is Policy T1 effective, justified and consistent with national policy? Is it consistent with PFE [PW09]?

Q7.2 Is Policy T1 positively prepared with regard to impacts on the Strategic Road Network (SRN)? Is it supported by evidence relating to the individual and cumulative impacts of development on the SRN? What consideration has been given to potential mitigation of impacts?

Q7.3 Can the Council demonstrate evidence of effective cooperation with National Highways with regard to Policy T1?

Policy T2

Q7.4 Is Policy T2 effective, justified and consistent with national policy? Is it consistent with PFE [PW09]?

Policy T3

Q7.5 Is Policy T3 effective, justified and consistent with national policy? Is it consistent with PFE [PW09]?

Q7.6 Does the absence of maximum car parking standards undermine the effectiveness of policies in the Plan that seek to make efficient use of land?

Q7.7 Is the requirement for pedestrian only safe routes through and around parking areas justified? Is this requirement necessary in conjunction with part g of the policy?

Q7.8 Is the requirement to provide appropriate mitigation in relation to off-site car parking impacts justified and effective? Is it appropriate for this requirement to apply to all development?

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Policy T4

Q7.9 Is Policy T4 effective, justified and consistent with national policy? Is it consistent with PFE [PW09]? Is there adequate evidence to justify going beyond relevant Building Regulations requirements in this case?

1. The HBF firmly considers that the requirements for electric vehicle charging should be those that are set out within Part S of the building regulations. These are the standards which the Government expects developers to work to and is the standard which our members use, as it is readily understood and technically implementable. Having different standards in different local planning authorities only adds to the cost and complexity of delivering the homes that are required.

2. Whilst the Planning Practice Guidance (PPG) outlines that there are opportunities for local planning authorities to go beyond building regulations in a number of areas (such as water efficiency and accessible/adaptable/wheelchair user homes), no such opportunity exists for electric vehicle charging.

3. Whilst this Local Plan is being assessed against the 2021 version of the NPPF, it is nevertheless worth highlighting that the 2026 NPPF sets out the Government's current position on this, with Policy PM13 being very specific on the areas where Councils can go beyond national standards. Electric vehicle charging is not one of them.

4. Therefore, for this policy to be justified and consistent with national policy, it should be deleted and the Council should be using Part S of building regulations as its standard.

Q7.10 Have the viability implications of Policy T4 been appropriately tested? Are the policies sufficiently flexible?

5. Table 6.14 of the Local Plan Viability Assessment (LPVA, December 2025) [PW05] contains an estimated cost for electric vehicle charging and this is based on *Electric Vehicle Charging in Residential and Non-Residential Buildings* which is a Government consultation document published in July 2019. This document eventually fed into Part S of building regulations, which was then published in 2021. The LPVA estimates this to be £1,000 per dwelling and £2,500 per 4 flats.

6. As such, the costs in the LPVA is based on Part S of building regulations, meaning that if the Council is going beyond Part S, this has not been appropriately costed. In fact, even assuming that it is Part S of building regulations being brought forward, the assumption of £1,000 per dwelling broadly corresponds with the cost in the July 2019 consultation document of £976 per dwelling. However, it should be noted that this figure is over 7 years old and the effects of inflation should also be taken into account.

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Policy T5

Q7.11 Is Policy T5 effective, justified and consistent with national policy? Is it consistent with PFE [PW09]?

Q7.12 Does the policy clearly distinguish the role and purpose of each document, and does it set out clear triggers where the different documents would be required?

Overall

Q7.13 Are the policies in Chapter 17 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?

7. Please see our comments in response to Q7.9 above. Policy T4 is unsound as it is unjustified and not consistent with national policy. The Council should be requiring new development to provide electric vehicle charging in line with Part S of the building regulations.

Q7.14 Are any Main Modifications required to ensure the policies are sound?

8. With reference to paragraph 16 of the 2021 NPPF, which is clear that local planning authorities should avoid replicating policies found elsewhere, Policy T4 should be deleted.