

Salford Local Plan: Core Strategy and Allocations Document **Spatial Planning** Salford Civic Centre Chorley Road Swinton M27 5BY

> SENT BY EMAIL plans.consultation@salford.gov.uk 22/01/2024

Dear Planning Policy Team,

SALFORD LOCAL PLAN: CORE STRATEGY AND ALLOCATIONS SCOPE OF THE PLAN

- 1. Thank you for consulting with the Home Builders Federation (HBF) on the Salford Local Plan: Core Strategy and Allocations Scope of the Plan 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.

Plan period

3. The Scoping document suggests that the Core Strategy and Allocations document will apply to the whole of Salford for the period up to 2041. The NPPF¹ 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 in account the likely timescale for delivery. The HBF considers that the Plan period to 2041 may not be appropriate and it is important that the Plan provides a 15-year period at the point at which the Plan is adopted and where larger scale developments, such as those included in the Places for Everyone document are proposed in the Plan, then a longer period may be required to take account of the timescale for their delivery.

Scope

- 4. The consultation document for the Core Strategy and Allocations document suggests that its proposed scope is limited to:
 - A long-term vision and overall strategy for the city.
 - Strategic objectives to complement those in part one of the plan. ii.
 - Defining boundaries for spatial areas identified in Places for Everyone, including the iii. Core Growth Area, Inner Areas and Northern Areas.

Home Builders Federation HBF House, 27 Broadwall, London SE1 9PL Tel: 0207 960 1600

Email: info@hbf.co.uk Website: www.hbf.co.uk Twitter: @HomeBuildersFed

¹ NPPF 2021 Paragraph 22

- iv. Housing strategy and policies to provide detail on the scale, distribution, type and supply of housing to be delivered in Salford.
- Economic development strategy and policies to provide detail on the scale and distribution of office, industrial and warehousing development to be delivered in Salford.
- vi. Visions for Eccles, Swinton, Pendleton and Walkden town centres.
- vii. Allocations for new development.
- viii. Local Green Space designations. All other types of protective designation were considered through part one of the plan.
- ix. Policies to support the delivery of key infrastructure proposals as required.
- 5. The HBF considers that scope for the document appears to be appropriate. The HBF are keen for the Council to consider the housing strategy for Salford and to provide policies in relation to the scale, distribution, type and supply of housing.
- 6. The HBF would also support the Council in working with the industry as it looks to allocate sites for new residential development.
- 7. The HBF notes that the emerging Places for Everyone document proposes a housing requirement for Salford of 28,186 dwellings in the period 2022-2039, with an annual average of 1,658 dwellings per annum (dpa). When considering the level of housing land supply to meet the housing requirement the HBF recommends that the Council ensure that they give consideration to an appropriate level of flexibility within the supply to ensure that the Plan is robust and resilient to change.
- 8. The Council's housing land supply should include a short and long-term supply of sites with both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, with a range of sites by both size and market location. A wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice and competition in the land market.
- 9. The Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.

Future Engagement

- 10. 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.
- 11. 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

Planning Manager – Local Plan (North)

Email: joanne.harding@hbf.co.uk

Phone: 07972 774 229