Local Plans Team

Mansfield District Council

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SENT BY EMAIL

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17/10/2025

Dear Local Plans Team,

**HBF RESPONSE TO MANSFILED LOCAL PLAN REVIEW (2023-2043)**

1. Please find below the HBF response to your Local Plan Review Consultation. We have not responded to all your questions, only those of relevance to our members. We would also note that the availability of tracked changes version of the Local Plan is very helpful in enabling engagement.
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. We welcome the Council’s efforts to begin work on ensuring Mansfield has an up to date Local Plan. Full nationwide local plan coverage is an essential part of the planning system and an objective HBF strongly supports. We would question though whether a new Local Plan rather than just a review of the current one would be a more effective way to proceed, especially as the Plan period is being changed from 2021-2041 to 2023-2043.
4. The NPPF states that 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. In recognition of the time it can take to progress a new Local Plan through all its required stages, HBF suggests that the Council should consider extending the Plan period to ensure that a 15-year period is provided post adoption of the Plan. It will also be important for the evidence base to be consistent with the Plan Period.
5. It will also be important for Duty to Cooperate to be both complied with and fully evidenced. It is important not only to detail that a meeting occurred but what was discussed, agreed, and not agreed. We note the many issues that other Local Plans have encountered when this has not occurred. Full consideration must be given to any unmet needs elsewhere.

**Question 1**

**Vision, issues, strategic priorities and objectives**

**Please comment here to let us know if you agree that the existing vision, issues, strategic priorities and objectives remain appropriate and should be taken forward in the Local Plan Review? If not, is there anything else that the Local Plan Review needs to include within the vision, issues, strategic priorities or objectives?**

1. HBF welcomes the Councils acceptance of the new standard method calculation method and its inclusion within the Plan. In order to deliver the Government’s stated ambition of 1.5 million new homes within this parliament it is essential that there is an uptick in housing delivery which requires an uptick in the number of new homes being planned for. We strongly support SP1.
2. HBF would however request that the Council considers the standard method calculation as only the minimum starting point for establishing the housing requirement for Mansfield, and fully considers all of the issues that may result in a need for a higher housing requirement. This includes the need to provide a range and choice of sites, the need for flexibility, viability considerations and whether higher levels of open-market housing are required in order to secure increased delivery of affordable housing. HBF considers that it is appropriate for the Council to identify housing, and the maintenance of the five-year supply as an objective for the Plan. Objective 3 could usefully be expanded to address this point.
3. We would also suggest that there is a need to consider the interaction between employment and housing, recognising that an increase in the number of jobs can it itself generate a requirement for additional housing.

**Question 2**

**The spatial strategy**

**Please comment here if you agree with the proposed spatial strategy. If not, what needs to be changed?**

1. The HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. The increased housing requirement will mean additional sites are needed; this should include both urban and rural sites. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination. We agree that new housing allocations will be needed, and some of these will need to be greenfield allocations. As such there will be a need to revisit Green Wedges, Areas of Separation and countryside designations as part of the preparation of the new Local Plan for Mansfield.

**Question 3**

**Distribution options**

**Please comment here to let us know which distribution option and combination of sites for the variable element of the development requirement you would prefer.**

1. As mentioned above HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full.
2. However, to promote sustainable development, especially in rural areas we would suggest that the Plan should identify where services could be improved through new development. Allocating housing sites in rural areas can also provide opportunities for small sites which are particularly helpful for SME builders.

**Question 4**

**Development in the countryside**

**Please comment here to let us know if you agree with our approach to this policy**

1. As mentioned above HBF believe there will be a need to allocate new housing sites, including some in rural areas.

**Question 5**

**Urban regeneration**

**Please comment here to let us know if you agree with our approach to this policy.**

1. The Council will need to ensure the ongoing deliverability of specific allocations being rolled forward into this Plan. We would encourage the Council to work with site promoters to ensure the most up to date evidence about this is available, and this matter is kept under review. Whilst HBF recognises the importance of a brownfield first approach to site allocations, there needs to be a recognition that in light of the number of new homes required, additional greenfield sites will be needed.

**Question 6**

**Achieving high quality design**

**Please comment here to let us know if you agree with our approach to this policy.**

1. HBF are supportive of the need for new development to be of high quality design. Building for Life can be a useful tool, but is not intended to be used as a Local Plan policy requirement.

**Question 10**

**Climate change and new development**

**Please comment here to let us know if you agree with our approach to this policy.**

1. HBF have concerns about the Council seeking to replicate and/or go beyond Building Regulations, including the introduction of the Future Homes Standard in Local Plan policies. HBF believes that Councils rely on the Building Regulations process as the way to manage improving energy efficiency standards, water efficiency and climate change policies and as such policies on these issues are simply not needed in the Local Plan.

**Question 14**

**Housing allocations**

**Please comment here to let us know if you agree with our approach to this policy.**

***and***

**Question 15**

**Potential new housing allocations**

**Please let us know if you have any comments or information about any of the potential housing allocations, or have any other site suggestions.**

1. HBF do not comment on individual allocations but note that as the Council has amended the housing numbers to reflect the new target which in our view could also be even higher additional sites will be needed. We have elsewhere commented on the potential need to extend the Plan period and as such further allocations may also be needed for this further housing requirement.
2. HBF would also request that the Local Plan allocation policies fully consider the issue of delivering against the new BNG requirements. This should include undertaking an assessment of the baseline to support the allocation to enable an understanding the BNG requirements for a site to be allocated and the impact this may have on viability and other policy requirements and considerations. It will be important to understand the costs of mandatory BNG as this is non-negotiable and as such may impact on the viability of the site and its ability to deliver against other policy requirements such as affordable housing or other s106 asks.

**Question 16**

**Committed housing sites**

**Please comment here to let us know if you agree with our approach to this policy.**

1. HBF agree that that housing sites that have been completed prior to the plan commencement period (1 April 2023) and those that have lapsed should be removed from the existing commitments. Similarly, we agree new sites will be needed, but we not comment on individual sites.

**Question 17**

**Housing density and mix**

**Please comment here to let us know if you agree with our approach to this policy**

1. It will be important for the Plan to allocate a mix and range of housing sites in order to ensure the provision of a mix and range of housing types, informed by the latest evidence. This will need to include the allocated of a range of sites including greenfield sites which may be better suited to the delivery of family housing, when compared against brownfield and/or town centre sites which may be better suited to a certain type of housing type, often apartments which appeal to a particular kind of buyer. Any policy on housing mix must include flexibility to allow for site-specific circumstances to be taken into account. The HBF would support policy wording to this effect.

**Question 18**

**Affordable housing**

**Please comment here to let us know if you agree with our approach to this policy.**

1. HBF agree that the Plan should reference the current definition of affordable housing by way of a reference to the NPPF. We note the intention to identify affordable housing needs in the Housing Needs of Particular Groups Study Update. We would welcome the opportunity to comment on this study and its findings once it is completed, and the resulting policy targets.
2. We agree that the affordable housing zones will need a review following completion of the Whole Plan Viability Assessment. The whole plan viability assessment is an essential part of the evidence base that tests whether the range of the policies in the plan as a whole make development unviable. To be most useful HBF suggest viability appraisals should be used in an iterative manner to test different policy combinations. HBF suggest that the whole plan viability assessment should be produced in tandem with the different stages of plan-making and not relegated to something prepared after the Reg 19 version of the plan has already been consulted on.

**Question 19**

**Custom and self-build homes**

**Please comment here to let us know if you agree with our approach to this policy**

1. It will be important to ensure this, and other policies, reflect the latest guidance on Biodiversity Net Gain, especially in light of the current consultations on Improving the implementation of Biodiversity Net Gain for minor, medium and brownfield development.

**Question 20**

**Specialist housing**

**Please comment here to let us know if you agree with our approach to this policy.**

1. HBF remain of the view that it is important Local Plan policies are not overly prescriptive and do not repeat building regulations. Viability is also an important issue to consider.

**Question 44**

**Infrastructure delivery**

**Please comment here to let us know if you agree with our approach to this policy.**

1. The Council will need to be able to demonstrate that the infrastructure needed to support new development Plans for is viable. This is essential for the deliverability of the Plan. It will also be important to ensure that increase viability pressures do not place to high a burden of developer contribution which may serve to undermine the deliverability of Local Plan policies and the IDP and its existing evidence base.
2. I trust that the Council will find these comments useful as it continues to progress its Local Plan. Please use the contact details provided below for future correspondence.

Yours faithfully

Text, letter

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Home Builders Federation

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