

Planning Strategy,
Manchester City Council,
Level 6, Town Hall Extension
PO Box 532,
Manchester
M60 2LA

SENT BY EMAIL

planningstrategy@manchester.gov.uk

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Dear Planning Policy Team,

DRAFT MANCHESTER LOCAL PLAN – REGULATION 18 CONSULTATION (SEPTEMBER 2025)

1. Thank you for consulting with the Home Builders Federation (HBF) on the Regulation 18 draft of the Manchester Local Plan.
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. The HBF would like to submit the following comments in relation to selected policies and questions contained in the Regulation 18 consultation document, plus additional comments to pick up on other key themes and areas. These responses are provided to assist the Council in the preparation of the emerging Local Plan. The HBF is keen to ensure that Manchester produces a sound Local Plan which provides appropriate policies for the area.

Plan Period

1. The Council is proposing a plan period from 2022 to 2040, which is a period of 18 years. Paragraph 22 of the National Planning Policy Framework (NPPF, 2024) outlines that as a minimum, strategic policies should look ahead over a 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 into account the likely timescale for delivery.
2. The Council's latest Local Development Scheme (LDS, September 2025), envisages adoption of the Local Plan by 31 July 2027. If that is the case, the HBF considers that the Council should be looking to lengthen its plan period to at least 2042 to ensure that it can meet the minimum plan period from adoption.

The Vision (Question 2)

3. The HBF considers that whilst the Vision is aspirational in its tone and that it mentions the need to provide affordable homes, the Vision should be much wider in relation to housing and state that the Local Plan should seek to meet the housing needs of all of Manchester and provide a sufficient mix of house types, sizes and tenures in the right locations to address this.

Objectives (Question 3)

4. The HBF supports that the Objectives include the need to provide for a significant increase in high quality housing that is affordable to all income groups, in attractive, safe and cohesive neighbourhoods (paragraph 4.3). To further improve this, this Objective should provide a spatial element to it to ensure that new homes are developed in the areas of Manchester to meet the needs defined in the Local Plan.

Policy SP1: Spatial Principles (Question 5)

5. The HBF observes that the Spatial Principles outlined in Policy SP1 have been driven by the Strategy in the adopted Places for Everyone Joint Development Plan Document (PfE, March 2024) (Policies JP-Strat 1, 2, 5 and 9).
6. Whilst the HBF considers that this is required for the Local Plan in order to ensure consistency across the development plan for Manchester as a whole, the Local Plan must also seek to balance this with the requirement of meeting needs across the city. The Council will therefore need to be mindful that the spatial strategy must allow the ability to deliver sufficient homes to meet local housing needs in a variety of locations. It is also important that the spatial strategy can be demonstrated to be viable so that housing is deliverable over the plan period.
7. The HBF would also highlight that the Council will need to ensure that the strategy is suitably broad. This is because a focus of development in a handful of specific areas which are likely to only generate certain types of homes will have implications for the types, size and tenure of homes provided (including affordable homes) and not necessarily provide the appropriate mix of homes needed to meet the housing needs across the city.

Policy SP2: Development Principles (Question 6)

8. Whilst this policy clearly sets out the overall principles that the emerging Local Plan is seeking to achieve, the HBF considers that greater clarity would be gained by the policy cross-referencing to the corresponding development management policies contained later on in the plan.

Policy SGL1: Strategic Growth Locations (Question 7)

9. This policy outlines a commitment for the Council to develop 61,000 new homes over the plan period and seeks to distribute them as follows:
- 42,000 homes in the Core Growth Area (in and around the city centre).
 - 15,000 homes in the Inner Areas.
 - 4,000 homes in the Southern Areas.
10. The Local Plan notes that the strategy for these locations is set out in the PfE, which sets a requirement for a focus of growth in the Core Growth Area and Inner Areas, followed by boosting northern competitiveness and southern competitiveness.
11. Notwithstanding the strategic direction provided in the PfE, the HBF considers that there is a risk in focussing so many homes within specific areas of the city. As outlined in our response to Policy SP1, the overall goal of the Local Plan should be to seek to meet the needs of all areas of Manchester over the plan period by offering a wide range of house types, sizes and tenures all across the city. It is unclear that Policy SGL1 would be able to achieve this and whether this is a strategy that would prove viable and deliverable.
12. As such, the HBF recommends that the Council examines the need across the city in further detail and then seek to align the plan's strategy with that approach. This will involve finding an appropriate balance between the strategic direction in the PfE and localised need that is also viable and deliverable.
13. Related to this, the HBF would also seek assurances that within the mix of sites put forward, that the Council provides 10% of its housing requirement on sites no larger than one hectare (in line with paragraph 73 of the NPPF). This is to assist small and medium housebuilders in delivering homes. The HBF considers that it is important that this requirement is appropriately covered by allocations rather than via windfall.

Policy H1: Housing Provision (Question 22)

14. This policy commits the Council to delivering 61,000 homes over the plan period along the lines of the distribution outlined in Policy SGL1. This quantum of homes equates to 3,389 dwellings per annum and compares to an annual minimum Local Housing Need (LHN) figure derived from the current Standard Method of 2,536 dwellings per annum. It is understood that the requirement (which is set out in the PfE) reflects the need for the 35% urban uplift that was in place at the time (which was applied to the previous Standard Method).
15. The HBF generally welcomes this uplift compared to the minimum current Standard Method figure, as it considers this reflects Manchester's role as the main focal point for growth in the

wider Combined Authority. Nevertheless, the HBF does have a number of comments concerning this approach.

16. Given that the Manchester Local Plan will not benefit from any transition arrangements, the HBF is aware that the evidence base will need to document the rationale for the uplift from the current LHN figure in line with paragraph 69 of the NPPF. This is especially important given that the PfE was adopted prior to the introduction of the new Standard Method in December 2024.
17. Aside from the overall housing requirement, the HBF reiterates its previous concerns about distribution of homes through this policy. The policy envisages that just under two thirds of new homes will be developed in the city centre (circa 40,000 units) and that these are most likely to be 2 bedroom properties (this is acknowledged in the policy itself).
18. Whilst it is clear that developing homes in the city centre should be encouraged (and is in line with the PfE), the fact that the distribution of homes is so heavily skewed to the city centre and the Core Growth Area, means there is a risk that the supply does not marry up with the types of homes which Manchester needs over the plan period and that the Local Plan does not deliver the variety of homes over the variety of locations that is required. The HBF therefore recommends that the Council ensures the supply of homes meets what the city needs, especially in light of Table 10.2 of the Local Plan which would indicate a clear need for a diverse range of house sizes.
19. This policy also covers housing density with reference to PfE Policy JP-H4. The HBF notes that PfE Policy JP-H4 is flexibly worded in that development should have 'regard to' the densities set out in the policy. PfE Policy JP-H4 also explains reasons as to why a development may not be able to achieve the densities set out and that density should be appropriate for the location. The HBF therefore considers that Policy H1 needs to note this flexibility and ensure it is accurately reflected in its wording.

Policy H2: Affordable Housing (Question 23)

20. The Council's 2023 Housing Needs Assessment (HNA) outlines an annual affordable housing need of 1,142 dwellings per annum. The Local Plan states that the Council is going to meet this by *inter alia* requiring all major schemes (10 or more homes) to provide 30% of homes as affordable housing, with a tenure split of 80% affordable rent and 20% affordable home ownership housing. Social rented housing is expected to make up 70% of the affordable housing provision.
21. The HBF supports the need to address the affordable housing requirements of the city. The NPPF in paragraph 35 is clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. It is currently unclear whether the affordable housing requirement has been informed by a whole-plan viability assessment so

as to demonstrate that this amount of affordable housing on development sites will not undermine viability. The Council will need to clarify this. Whilst the policy does allow for developers to challenge the affordable housing requirement if it would make a scheme unviable, it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high, as this will jeopardise future housing delivery.

22. It is noted that the total annual affordable housing need equates to around 33% of the total housing requirement per annum, above the 30% requirement that has been set by the policy. Whilst the accompanying explanatory text to Policy H2 notes that not all affordable homes will come through Section 106 agreements, the Council should bear in mind that the PPG states that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes (Reference ID: 2a-024-20190220).
23. The HBF would also recommend that there should be a degree of flexibility in terms of the precise tenure split, which can take into account location specific circumstances or instances where a Registered Provider has not been able to be found to acquire the affordable units.

Policy H4: Supported Housing (Question 25)

24. This policy includes a criterion to incorporate housing provision specifically targeted at older people within new residential development. Neither the policy nor the accompanying text states if there is a threshold for such a requirement or whether this has been included in any whole-plan viability work. As part of the policy's justification, it highlights PfE Policy JP-H3 which outlines that development across the plan area should seek to incorporate a range of dwelling types and sizes and that 'where appropriate', this should include incorporating specialist housing for older households.
25. The HBF is generally supportive of providing homes that are suitable to meet the needs of older and vulnerable people but it is clear that Policy HE-H3 is not advocating that all development includes housing provision specifically targeted at older people as it is caveated with 'where appropriate'.
26. 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 to identify appropriate specific sites for allocation. 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.

27. 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). As such, the HBF considers that the Council needs to work closely with the providers of older persons housing to identify appropriate sites or to provide appropriate policies.
28. The policy also reiterates the requirement in the PfE for all new homes to be built to M4(2) standards (PfE Policy JP-H3) and adds that the Council seeks a minimum 4% of all new homes, on schemes delivering 10 or more units, to be compliant with M4(3) standards.
29. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. The PPG is clear that such standards are optional, and so if the Council is going to introduce an M4(3) standard, evidence needs to be provided to justify its inclusion, including 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). If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.
30. The HBF considers that if the Council has the evidence to introduce this policy, it may also want to consider the most appropriate way to deliver the homes they require to meet their needs. The HBF considers that this may not always be in the form of M4(3) homes and may need further consideration.
31. The Council will also no doubt be aware that Part M of the building regulations sets a distinction between wheelchair accessible dwellings (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable dwellings (a home that can be easily adapted to meet the needs of a household including wheelchair users). The PPG is clear that local plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (Reference ID: 56-009-20150327). The Council will need to ensure the policy is consistent with this position.

Policy H7: Housing Design (Question 28)

32. The HBF welcomes the clarity, which is provided by this policy, however as outlined in our comments to Policy H1, the density standards contained within PfE Policy JP-H4 allow for flexibility and for schemes to 'have regard to' the densities shown in the tables. In contrast, Policy H7 is much blunter in requiring adherence to the densities found in PfE Policy JP-H4. Given that this was never the intention of the PfE policy, the Council needs to ensure a similar approach to flexibility in densities is provided.
33. Linked to this, it is noted that the policy requires that new residential development needs to make provision for:

- Appropriate usable outside amenity space, including in high density development.
- Permeable materials for outside surfaces.
- Parking cars and bicycles.
- Wheelie bin storage.
- Appropriate levels of sound insulation.
- Any environmental constraints on a site's development (e.g. flood risk or statutory designations).
- Privacy to both its residents and neighbours.

34. Whilst the HBF has no objections to these requirements, the Council will need to explain how sites will incorporate such features whilst simultaneously achieving the housing densities it requires.

Policy ZC1: Sustainable Design and Construction (Question 40)

35. The HBF notes that this policy covers a broad range of areas related to sustainable design and construction and agrees that tackling climate change is a significant challenge that is facing Manchester and the wider country. The HBF nevertheless has a number of comments regarding some of the specific elements of this policy which we outline below.

Building Standards

36. Part B of this policy outlines a number of different building standards which development is to adhere to. For residential development in particular, this includes the Manchester Net Zero Carbon Building Standard.

37. The HBF does not support this approach, rather it 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 Written Ministerial Statement of December 2023 (WMS, reference: UIN HLWS120), 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.

38. The WMS clearly states that any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they do not have a well-reasoned and robustly costed rationale. Currently that evidence has not been provided.

39. It is noted that in its justification, the Council has referenced PfE Policy JP-S2, however the PfE notes 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.

40. Notwithstanding this, the current wording of the policy requires adherence to the Manchester Net Zero Carbon Building Standard. This document itself is not part of the development plan and so the HBF does not consider it appropriate that the document is effectively given development plan weight via Policy ZC1 in requiring applicants to adhere to it.

Whole Life Carbon Assessment

41. Part C of the policy requires major development to take action to reduce life-cycle carbon emissions demonstrated through a Whole Life Cycle (WLC) Carbon Assessment. Footnote 14 of the Local Plan notes that this should be done using a nationally recognised assessment methodology.
42. The HBF considers that if the Council is to introduce a policy in relation to WLC, it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment; particularly in relation to how easily accessible any data is, and that it will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the homebuilding industry. This includes material extraction and transportation, occupation and maintenance, demolition and disposal. The Council will also have to consider how the policy will interact with other policies, for example in relation to energy efficiency or resilience to heat, as well as the viability and deliverability of development.
43. The HBF considers that if this policy were to be introduced, then the Council should provide a transitional period to give the industry time to adjust to the requirements, to upskill the workforce as needed and for the supply chain to be updated or amended as required.
44. Whilst the policy references nationally recognised assessment methodology, the HBF is unaware of any commonly accepted way in which to assess WLC. Indeed, Aecom on behalf of MHCLG have undertaken a research report on the practical, technical and economic impacts of measuring and reducing embodied carbon in new buildings (see: <https://www.gov.uk/government/publications/consideration-of-embodied-carbon-in-new-buildings>). They highlight issues with the lack of consistency in reporting on carbon assessment outputs, the quality of carbon assessments, large gaps in the availability of both product specific and generic data, the variation in product carbon results for similar building products and lack of consistency across carbon tools. They also highlight issues with the uptake of lower embodied carbon materials and products due to the costs, risks and insurance, the need to upskill the industry and access to carbon tools.
45. Whilst this report makes recommendations as to how all of the challenges they identify can be addressed, they have not been addressed yet and are not likely to be addressed in the short term. The HBF is concerned that as such, there are significant challenges with introducing a policy in relation to WLC, for many of the reasons identified in this research.

Electric Vehicle Charging

46. Part F of the policy requires the installation of Electric Vehicle (EV) charging points to be at least in line with Part S of the building regulations. Given that Part S is the standard which the Government has mandated, there should not be any requirement to exceed this, and given that the NPPF advises that local planning authorities should avoid repetition of policies located elsewhere (paragraph 16), then the HBF considers that this part of the policy is superfluous.

Requirement for a Sustainability Statement

47. The final part of the policy outlines the requirement for development proposals to provide a Sustainability Statement/Assessment. The HBF considers that not all development proposals should require such an assessment as it depends on the nature and scale of the development. This part of the policy should either be clarified or should be removed and any requirement for a Sustainability Statement/Assessment should instead be detailed in the Council's planning application validation list.

Policy ZC2: Towards Net Zero Carbon (Question 41)

48. The HBF notes that there is a degree of overlap between this policy and Policy ZC1 and so it is recommended that both are reviewed and any duplication is removed.
49. The HBF recognises the Council's ambition to move to net zero carbon but in line with our comments in relation to Policy ZC1, this should be achieved through implementing national standards rather than locally based standards. This ensures a consistency of approach across all local planning authorities which assists in the delivery of new homes. In contrast, when local planning authorities each set their own standards, this inevitably results in a patchwork of different requirements which adds to the complexity, delay and costs of bringing forward much needed new homes.
50. It is also noted that Part B of this policy outlines that all developments should incorporate the use of renewable and low carbon energy on site. The HBF does not consider that it is a reasonable requirement for development to maximise opportunities to generate energy from renewable sources or low carbon energy. The HBF recognises that there may be potential for energy to come from these sources, however, it may not always be the most sustainable, efficient or effective approach.
51. In a similar manner to our comments on Policy ZC1, the HBF considers that the requirement for an Energy Statement for all developments is unreasonable given that this will depend on the nature and scale of the proposals. In any event, the requirement for an Energy Statement is best addressed through the Council's planning application validation list.

Policy ZC4: Heat Networks (Question 43)

52. This policy outlines that where district heating networks exist or are proposed, the Council will expect the development proposals to demonstrate that the proposed heating and cooling systems have been selected considering the heat hierarchy. This prioritises connections to networks fuelled by renewable sources, followed by networks fed by renewable or low carbon sources and then connection to existing networks (with a decarbonisation plan).
53. The HBF considers that it is important that any policy in relation to heat networks is not seen as a requirement and is instead implemented on a flexible basis. Recognising that heat networks are one aspect of the path towards decarbonising heat, and that other technologies can also contribute.
54. Government consultation on Heat Network Zoning (see: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1024216/heat-network-zoning-consultation.pdf) also identifies exemptions to proposals for requirements for connections to a heat network. These include where a connection may lead to sub-optimal outcomes, or distance from the network connection points and impacts on consumer bills and affordability.
55. In relation to this latter point in particular, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch energy supplier, which curtails consumer choice.

Policy EN3: Trees and Woodlands (Question 46)

56. As part of this policy, there is a requirement for replacement tree planting where tree loss from development cannot be avoided. As a minimum, it outlines that two trees or equivalent canopy cover at maturity, or a commensurate financial contribution, will be required for every tree lost. This minimum is increased to three trees in certain areas of the city which already have lower tree canopy cover.
57. The HBF recognises the importance of tree retention wherever possible, although sometimes this may be unavoidable when taking into account the need to provide safe junction layouts, coherent design and the installation of supporting infrastructure. Nevertheless, the HBF is concerned by the potential tree replacement strategy provided, as this could have significant potential implications in terms of viability of the development, not only due to the replacement costs but also in terms of efficient land use/site coverage, site density, site layout and high-ways considerations. The HBF understands the Council's desire to prevent the loss of trees

but would question whether the tree replacement strategy proposed is the best way to do this, and whether other options may be more appropriate, and whether this policy needs to be applied much more flexibly in order to take into consideration other requirements and circumstances.

Policy EN5: Biodiversity Net Gain (Question 48)

58. The HBF notes the introduction of mandatory Biodiversity Net Gain (BNG) came in for large sites on 12 February 2024, and for small sites from 2 April 2024. This was accompanied by relevant updates to the PPG. In particular the PPG states:

“Plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provisions of this statutory framework. It will also be inappropriate for plans or supplementary planning documents to include policies or guidance which are incompatible with this framework, for instance by applying biodiversity net gain to exempt categories of development or encouraging the use of a different biodiversity metric or biodiversity gain hierarchy.

Plan-makers can complement the statutory framework for biodiversity net gain by, for instance, including policies which support appropriate local offsite biodiversity sites, including whether specific allocated sites for development should include biodiversity enhancements to support other developments meet their net gain objectives in line with Local Nature Recovery Strategies.

Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified....” (Reference ID: 74-006-20240214).

59. The HBF would therefore recommend that the Council reviews the policy to strip out the elements which reiterate the statutory framework and guidance. It is also considered that planning application requirements listed in the policy should be removed and included within the Council's planning application validation list instead. The Council will need to ensure that an appropriate cost for BNG is included in the Local Plan's whole-plan viability assessment and that this also acknowledges the impact that on-site BNG can have on site coverage and densities.

60. The policy also seeks to cover developments which are exempt from mandatory BNG. In these cases, there is still nevertheless an expectation to demonstrate an enhanced level of biodiversity, proportionate to the nature and scale of development. The HBF suggests that this part of the policy should also qualify that the requirement of non-mandatory BNG can be subject to viability and feasibility considerations, as this may not be achievable for all non-mandatory development.

61. More generally, the Council also needs to consider how BNG sits with and interacts with the other Environment policies in the plan, so as to avoid any inconsistencies and to link policy requirements where relevant.

Policy EN6: Urban Green Factor (Question 49)

62. This policy incorporates a tool for assessing the proportion and quality of green infrastructure on development sites. Ensuring that an appropriate amount of green infrastructure is provided on a site is important, however the HBF notes that this policy seeks to apply a rigid formulaic approach to this.
63. The HBF is concerned that this approach may not be appropriate in all circumstances. It is also clear that not all of the Urban Green Factors described in Appendix 18 of the Local Plan can be applied to all sites, and the Council will need to be certain that it is not unduly penalising sites where some of these factors cannot legitimately be provided (which may then affect a site's overall score). The HBF would therefore recommend a much less formulaic approach is considered which is more adaptable to site specific circumstances.
64. In a similar way to Policies EN3 and EN5, the Council will also need to make sure that the implication of this policy is fully taken into account in the whole-plan viability assessment in terms of its effect on net developable areas. Indeed, the HBF is concerned that these policies cumulatively, alongside other policy and statutory requirements, may put significant pressure on net developable areas and site densities. This will need to be explored further by the Council.

Policy SI3: Social Value (Question 58)

65. The HBF notes the requirement for providing a Social Value Strategy as part of this policy and appreciates that this can be a way in which many of the positive aspects of building additional homes can be articulated through a planning application. However, such benefits should be implicit and driven through the Local Plan anyway, such that development which complies with the Local Plan should already be demonstrating the requirements of this policy. The need for a specific Social Value Strategy for such developments is therefore questionable, especially in light of paragraph 44 of the NPPF which highlights that planning application requirements should be kept to a minimum.
66. The need for a Social Value Strategy for all major developments is also questionable and does not appear to be justified by evidence. The HBF considers that it is unlikely that all major developments should require such a document, as this would depend on the nature and scale of the development. It would therefore be beneficial that this is removed from the policy and included within the Council's planning application validation list, where the need for such a document can be better clarified.

Policy T2: Sustainable Location of Development (Question 60)

67. This policy outlines a number of criteria which *inter alia* includes that in all parts of Manchester, proposals will need to provide cycle parking in line with national guidance (LTN 1/20).
68. The HBF considers that this is an entirely laudable aim and should be encouraged, however it may not be possible in all instances to design cycle parking specifically to LTN 1/20 standards owing to site constraints, existing highway infrastructure or viability. Furthermore, the wording of the policy seeks to give LTN 1/20 development plan status (in requiring compliance) when it is guidance, not policy.
69. Instead, the HBF would recommend this part of the policy is re-worded so as to encourage the implementation of cycle parking in line with LTN 1/20 where it is practical, feasible and viable.

Policy T4: Digital Infrastructure (Question 62)

70. The HBF generally considers that digital infrastructure is an important part of sustainable development within an area. The Council however will no doubt be aware that the requirements for broadband/fibre connectivity is covered in Part R of the building regulations and this should be the national standard that developments should adhere to. As such, the HBF considers that the first criterion of this policy is not required.
71. The second policy criterion requires development proposals to meet the expected demand for mobile connectivity generated by the development and the third criterion requires to take appropriate measures to avoid reducing mobile connectivity in surrounding areas. Such requirements are not within the direct control of the development industry, and as such it is considered that this part of Policy T4 could create deliverability issues for development and developers. Service providers are the only ones who can confirm access to infrastructure. Whilst the NPPF in paragraph 119 establishes that local planning authorities should seek to support the expansion of electronic communications networks, it does not seek to prevent development that does not have access to such networks.

Policy DC1: Developer Contributions (Question 77)

72. This policy sets out the Council's approach to requesting developer contributions to mitigate the impact of development. The HBF considers that the policy is broadly understood but recommends that to provide greater clarity, the policy should reference the statutory tests outlined in Regulation 122(2) of the Community Infrastructure Levy (CIL) Regulations 2010 (replicated in paragraph 58 of the NPPF). This states that planning obligations should be:
- Necessary to make the development acceptable in planning terms.

- Directly related to the development.
- Fairly and reasonably related in scale and kind to the development.

73. It is also important that this policy is specifically linked to the Council's Infrastructure Delivery Plan (IDP) so that it is clear on the infrastructure that needs to be delivered to support development over the plan period.

74. Alongside this, it is also crucial that developer contributions (along with other policy requirements) are tested thoroughly in the whole-plan viability assessment to establish that their provision will not undermine the delivery of development. It is noted that the policy does state that site specific viability can be taken into account when looking at developer contributions at the planning application stage. However, the HBF considers that this should be the exception rather than the rule, as to expect all sites to negotiate viability is unrealistic and would jeopardise future housing delivery.

75. The policy also outlines that where developer contributions have been negotiated through a site specific viability assessment, a reconciliation clause is proposed to be inserted as standard in a Section 106 agreement to allow re-testing of viability at an appropriate trigger point. The HBF considers that if such an approach is brought forward, this should allow for both instances where viability has improved and where it may have worsened so that planning obligations can be reconsidered accordingly.

Monitoring

76. The HBF recommends that the Council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported. This should also include the targets that the plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provide 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.

Future Engagement

77. 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.

78. 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,

Chris Martin

Chris Martin BSc(Econ) MSc MA MRTPI
Regional Planning Manager (North West, North East and Yorkshire)
Home Builders Federation
Email: chris.martin@hbf.co.uk
Phone: 07972774229