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Dear Sir/ Madam

Rochdale Borough Draft Local Plan –Regulation 18 Consultation

1. Thank you for consulting with the Home Builders Federation (HBF) on the Rochdale Borough Draft Local Plan – Regulation 18 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 multinational 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 the proposed policies and other key themes and areas. The HBF is keen to ensure that Rochdale produces a sound Local Plan which provides appropriate policies for the area.

Changes to National Planning Policy and Plan-Making System

4. It is worth highlighting that in December 2025, the Government published a consultation on a new National Planning Policy Framework (NPPF). This followed a Written Ministerial Statement made on 27 November 2025 which outlined the Government's intention to move forward with a new plan-making system (reference: UIN HCWS1104). The move to a new plan-making system includes a series of transitional arrangements.
5. It is understood that currently, the Council is intending to use these transitional arrangements and submit its Local Plan for examination under the current plan-making regime. On this basis, paragraphs 4 and 8 in Annex A of the draft NPPF outline that the Local Plan will then be examined under the current NPPF (December 2024). However, it is also notable that in relation to decision

making, Annex A also states that from the date the new NPPF is published, Local Plan policies that are “...any way inconsistent with national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework”.

6. Consequently, in preparing the next iteration of this Local Plan, the Council may need to have regard to national policies for decision making, given that any inconsistency may effectively render policies in the Local Plan that are not consistent with the new NPPF redundant as soon as the Local Plan is adopted.

Plan Period

7. It is noted that the Local Plan proposes a plan period from 2022 – 2039 (17 years). The Council will be aware that the NPPF makes clear that local planning authorities should, as a minimum, provide a 15 year plan period from adoption of a Local Plan (paragraph 22).
8. The Council’s most recent Local Development Scheme (LDS, September 2025) envisages adoption of the Local Plan by 2027. With this being the case, then the Local Plan from adoption will only have a plan period of 12 years. As such, the HBF recommends that the Council extends the plan period to at least 2042, so as to achieve the minimum plan period.

Spatial Vision

9. The HBF notes that the Spatial Vision incorporates a strategy for housing which includes the delivery of new homes in sustainable locations in town centres and near railway stations, as well as through strategic sites. Whilst this is supported, it is considered that the approach to providing new homes needs to be much broader and more ambitious than this. The Spatial Vision needs to explicitly state that the delivery of new homes should meet the needs of the whole of Rochdale and all areas of its housing market. This should include an appropriate mix of both larger strategic allocations and smaller non-strategic allocations in sustainable locations across the Borough and consider both greenfield and brownfield sites.

Strategic Objectives

10. Strategic Objective 3 (SO3) provides the overarching aim for residential development in the Local Plan. This includes, ‘Delivering the number of homes required to meet housing need and support economic growth...’. Whilst again, the HBF is broadly supportive of this goal, it should be strengthened to read ‘Delivering, *as a minimum*, the number of homes required to meet housing need and support economic growth....’

Spatial Priorities

11. Section 5 of the draft Local Plan attempts to transpose the Strategic Objectives into a spatial strategy for the Borough. This has been informed by the overarching spatial strategy for the wider city-region set out in the Places for Everyone (PfE) plan, which is the strategic level development plan for nine of the Greater Manchester local planning authorities.
12. Whilst it is accepted that the PfE should form the basis for the Local Plan's spatial strategy, there is a requirement for the Council to seek to provide a finer grain local analysis and it is considered that this should be based on a robust settlement hierarchy which can help inform this exercise. Currently, whilst the Borough's main townships are identified, this in itself does not form a sufficient settlement hierarchy. The consequence of this is that there does not appear to be a detailed rationale for the spatial priorities contained in the plan.
13. In relation to housing specifically the spatial priorities identify the need to:
 - Deliver a mix of high-quality housing to meet the housing target for the borough as set out in the PfE plan.
 - Deliver residential masterplans in town centres and around railway links to boost sustainable growth and regeneration in the city-region.
14. As outlined in our response to Policy H1 below, it is considered that the Council should, as a minimum, be planning to meet its Local Housing Need (LHN) as defined by the current Standard Method, and that whilst residential development in town centres and around railway links is supported, the Local Plan needs to go further to ensure that housing need is met over the entire Borough and a sufficient variety of sites is put forward in a variety of sustainable locations.

Policy S1 – Sustainable and Energy Efficient Development

15. The HBF supports the need for new development to reduce carbon and to be more energy efficient. To this end, the industry has been working positively to ensure that it aligns with the Government's climate change targets. The HBF therefore 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 HCWS123), 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.
16. The Council has referenced PfE Policy JP-S2, and it is noted 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. As such, the HBF seeks assurances that this is the case and that the Council is not intending to set its own local standards.

17. Criterion (i) in particular encourages applicants to use embodied carbon standards (as measured by CO₂ e/m²) to demonstrate how embodied carbon has been reduced. Whilst the HBF can see merit in tackling embodied carbon, there is currently a 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. As such, there is the likelihood that the Council will get inconsistency as applicants may use different standards and methodologies for measuring embodied carbon. As such, the HBF would suggest the policy steers away from a quantitative measurement of embodied carbon to a more qualitative assessment.

Policy S4 – Managing Water Resources and Flood Risk

18. Criterion (h) of this policy requires that residential developments should achieve, as a minimum, the tighter water efficiency standard of 110 litres/person/day.
19. The current standard found in Part G of the building regulations is 125 litres/person/day. The Government, through the PPG, permits local planning authorities to include a tighter water efficiency standard of 110 litre/person/day within their local plans, but only on the basis that:
 - Evidence is presented to justify the approach.
 - Consultations with the local water and sewerage company, the Environment Agency and catchment partnerships are undertaken.
 - The impact on viability and housing supply is considered.
20. Therefore, moving to the more stringent water efficiency standard is on the basis of ‘need’ rather than a ‘nice to have’.
21. In relation to evidence specifically, it details that the primary sources are:
 - The Environment Agency water stressed areas 2021 classification.
 - Water resource management plans produced by water companies.
 - River Basin Management Plans.
22. The North West is not currently defined as a region that is in water stress and the HBF is not aware of any Water Resource Management Plans or River Basin Management Plans which would indicate a move to the more stringent water efficiency standards is needed. As such, there is currently no justification for Criterion (h). Moreover, there has not been any viability testing to

ascertain the impact of this on the delivery of new homes in the Borough. All this would indicate that Criterion (h) should be deleted.

Policy PR2 – Creating Vibrant Main Town Centres

23. Part 6 of this policy supports the principle of residential development in designated centres on appropriate sites that reflect the distinctive role and design of the centre and where there is a diversity of tenure provided. The policy also then provides more detailed development management type policies which then need to be addressed.
24. The HBF supports such development but this should be part of a wider mix of housing offered within the Borough. The Council will therefore need to ensure that the strategy for new homes is suitably broad, as a focus of development in centres 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 Borough.

Policy H1 – Delivering the Right Amount of Housing in the Right Places

25. This policy commits the Council to deliver at least 616 net additional dwellings per annum up to 2039 to assist in the creation of successful, inclusive and mixed communities. The justification for the policy is that this transposes the housing requirement contained within policy JP-H1 of the PFE.
26. The HBF would observe that whilst this is the number apportioned to Rochdale through the PFE, the PFE itself was adopted prior to the Government publishing a new Standard Method for calculating Local Housing Need (LHN). The NPPF itself is clear that this should be used as the basis for establishing a local planning authority's housing requirement in its Local Plan (paragraph 62).
27. Under the Standard Method, Rochdale should plan for a minimum of 942 dwellings per annum (an additional 326 dwellings per annum). The HBF considers that, notwithstanding the PFE providing a strategic role in setting development patterns for Rochdale, there is no reason why the Council should not be planning to meet its current LHN of 942 dwellings per annum as this is clearly the Government's intention for all local planning authorities and the HBF cannot see any justification as to why Rochdale should depart from this.

Policy H2 – Delivering the Right Types of Homes

28. Policy H2 sets out the overall form of residential development that the Council wishes to see delivered in the Local Plan, including housing mix, size, design and density.

29. In relation to housing mix, the policy identifies the requirement that residential development should provide an appropriate mix that takes account of local needs and aspirations. Whilst the HBF acknowledges that this is an important consideration, it is not the only consideration when examining housing mix. A site's location and characteristics are also important, as are market and commercial considerations alongside viability.
30. The HBF would therefore seek that the policy adds in flexibility so that these factors can be taken into account and the Council avoids overly prescriptive requirements which may frustrate housing delivery in key areas of the Borough.
31. For densities, the policy seeks the promotion of densities in line with PfE Policy JP-H4. The HBF supports the efficient use of land and this is a key part of the NPPF (Section 11), however this does need to be balanced with site characteristics and context, being able to provide an appropriate mix of homes, provide other policy requirements (eg. open space, trees and biodiversity net gain), viability and ensuring a high-quality design and residential amenity. It should be noted that Policy JP-H4 specifically states that 'regard' should be had to the densities outlined in the policy; that is to say, they should not be rigidly applied. The HBF would therefore seek that Policy H2 makes clear that 'regard' needs to be had to the densities and that an appropriate balance will be sought between using land efficiently and the other factors highlighted above.

Policy H3 – Providing Affordable Homes

32. The HBF supports the provision of affordable homes and notes that its Members play a key role in delivering these across the country. Policy H3 proposes a Borough wide requirement of 20% affordable homes on all developments of 10 dwellings or more. The accompanying policy justification mentions the Council's Strategic Housing Market Assessment (SHMA) which has informed this policy and mentions that this is to be updated with a Housing Needs Assessment (HNA) which is currently being prepared.
33. Once the HNA is produced, this will need to inform any updates to this policy. In doing this, the Council will need to appropriately balance the affordable needs within the Borough with viability to ensure that sites remain deliverable. Achieving such a balance is a requirement in the NPPF (paragraph 35). We look forward to reviewing this further once the HNA is completed and the Council's viability work is published.
34. The policy also requires 5% of all affordable homes on sites of 100 dwellings or more to be built to M4(3) standards. 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). The forthcoming HNA and viability work will therefore need to consider this to provide the necessary evidence.

35. 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.
36. 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.
37. The policy also includes the Council's approach to tenure which sets out a requirement for a minimum of 80% of the affordable homes being for social rent, with the remainder for affordable home ownership. The HBF would recommend that there should be a higher 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 H5 – Housing for Older People and People with Disabilities

38. The HBF is generally supportive of providing homes that are suitable to meet the needs of older and vulnerable people. We 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.
39. 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. This is preferable to requiring general housing sites to incorporate older persons living, as the two may not be compatible in terms of locational requirements, operations and facilities.

Policy G4 – Watercourses and their Settings

40. Criterion (g) of this policy seeks that applicants design schemes that do not involve culverting and also seek opportunities to de-culvert watercourses. Whilst the notion of avoiding the culverting of watercourses is a laudable aim, the HBF would seek some additional flexibility in the wording of the criterion.
41. This is because it may be the case that the only way to access a site (which in all other aspects may be sustainable) is to cross a watercourse. In those instances, culverting may be the only option available and providing it can be proven that the impact of culverting can be mitigated and minimised, this should then not be a factor in preventing development from coming forward.
42. The policy therefore needs amending so that it states that culverting should be avoided ‘wherever possible’ to allow for these eventualities.

Policy G5 – Urban Greening

43. Policy G5 requires major development to use the latest version of the national Urban Greening Factor (UGF) calculator to demonstrate that minimum scores have been achieved in terms of green infrastructure coverage.
44. 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 that cannot necessarily be applied to all sites. The Council will need to be certain that it is not unduly penalising sites where the minimum score cannot legitimately be provided. The HBF would therefore recommend a much less formulaic approach is considered which is more adaptable to site specific circumstances.
45. It is acknowledged that the policy currently does provide some limited flexibility in this regard, but the HBF would consider that further flexibility is needed. The reason for this is when combined with policies such as minimum site densities and other potential policy and statutory requirements (such as biodiversity net gain, nationally described space standards, enhanced accessibility standards, the need to incorporate active travel infrastructure etc) this may put significant pressure on net developable areas, which in turn may negatively affect site viability.

Policy G6 – Trees, Hedgerows and Woodlands

46. The HBF considers tree coverage for new development is important and supports the encouragement in this policy to retain trees wherever possible (acknowledging that there may be instances where this may be unavoidable). Similarly, the requirement for tree lined streets is supported as this is consistent with paragraph 136 of the NPPF, however reference should also be made to

footnote 52 which clarifies that there may be instances where the provision of street trees is not possible.

47. As part of this policy, there is a requirement for replacement tree planting where tree loss from development cannot be avoided. The approach seems to seek a minimum replacement of 2 trees planted for every single tree lost. 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 highways 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 G7 – Biodiversity and Geodiversity

48. This policy contains *inter alia* the Council's proposed approach to biodiversity net gain (BNG). In relation to plan making, the PPG highlights that plan-makers should be aware of the statutory framework for biodiversity net gain and that they do not need to include policies which duplicate the detailed provisions of this statutory framework (Reference ID: 74-006-20240214). The Council will therefore need to ensure that elements of the BNG regulations are not simply copied over to Policy G7.
49. The HBF considers it is appropriate for the policy to consider the relationship between the plan and the Greater Manchester Local Nature Recovery Strategy (LNRS). However, the LNRS should not be used to restrict development or to limit the requirements of the BNG metric. As such, this policy should be kept under review and further public consultation on the interaction between the two documents and/or changes to the Local Plan policies may need to be undertaken to reflect what the LNRS may then need.

Policy PE3 – Health and Wellbeing

50. The HBF notes that this policy requires developers to provide a Health Impact Assessment (HIA) for planning applications and proposals that would have the potential to have a significant impact on health and wellbeing and where the Council believes there are likely to be clear health implications as a result of the proposal.
51. The PPG notes that HIAs can be useful tools where there is potential to have a 'significant impact' on health from proposed developments (Reference ID:53-005-20190722). The wording of

Policy PE3 seeks to align with this threshold, however it is unclear from the policy how an application would be determined to have a potential significant impact. The HBF would suggest that developments should be screened against specific criteria to determine if a HIA is necessary. Given the PPG threshold of ‘significant’, we would anticipate that few applications would actually need a HIA. Furthermore, within their preparation, Local Plans should be considering the wider health issues in an area and ensuring policies respond to these (Reference ID: 53-005-20190722). As such, Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Consequently, where a development is in line with policies in the Local Plan, a HIA should not be necessary.

Policy PE7 – Social Value

52. This policy requires all applications for major development to be accompanied by a Social Value Strategy. The HBF 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.
53. The need for a Social Value Strategy for all major developments is also questionable and does not appear to be justified in any evidence. The HBF considers that it is unlikely that all major developments should require such a document.

Policy T2 – Creating Sustainable Streets

54. Whilst the HBF supports the principle of this policy, it has concerns with regards to the wording of criterion (a). This requires proposals to be ‘in accordance’ with the Transport for Greater Manchester (TfGM) Streets for All Design Guide. The Design Guide in this instance is not a development plan document itself (rather it is a material consideration), however, by requiring compliance with the Design Guide through Policy T2, the Council is effectively giving the Design Guide development plan status. This is not appropriate given that it has not been subject to the same scrutiny and examination as a development plan document. The wording of this policy should therefore be changed so that applicants ‘have regard to’ the Design Guide.

Policy T5 – Accessibility Criteria

55. The overall aim of this policy is to ensure development proposals will be accessible to all and to this end, the Council is intending to apply a series of Accessibility Criteria (found in Appendix 4 of the Local Plan).
56. The HBF supports measures to ensure that new development is as accessible as possible and considers that this is an important facet of making a scheme sustainable. However, we have concerns that the Accessibility Criteria in Appendix 4 of the Local Plan provides a series of rigid and inflexible standards against which development proposals are to be assessed. This runs the risk of the Council adopting a crude ‘pass/fail’ system when it comes to assessing sites. This is especially the case for distances to facilities, as the quality of a route is just as important as the distance. This type of nuance is not currently referenced in the criteria and so there is a danger that this becomes a blunt tool and an ineffective way to accurately measure site accessibility. As such, the HBF considers that the rigid application of Accessibility Criteria should be avoided.

Policy T6 – Bee Active Travel – Walking Wheeling and Cycling

57. In a similar manner to our comments in relation to Policy T2, the HBF supports the overall aim of this policy but would highlight that the policy should not require all designs to adhere with the GM Streets for All Design Guide and Check List. This is because this document is not a development plan document (it is a material consideration) and therefore should not, through this policy, be given development plan weight. The wording of this policy should therefore be changed so that applicants ‘have regard to’ the GM Streets for All Design Guide and Check List

Policy DM1 – General Development Requirements

58. This policy is wide ranging and lists a number of development management matters which the Council will consider when assessing development proposals. The HBF considers that whilst the aspirations of this policy are generally laudable, the policy is more of a statement of intent than a policy that will guide development, and repeats elements that are contained within other policies. Therefore, the HBF does not consider that the policy is in line with the NPPF which in paragraph 16 looks for policies to contain policies where it is evident how a decision maker should react to development proposals and to serve a clear purpose avoiding unnecessary duplication. The HBF recommends that this policy is deleted or moved to general introductory text.

Policy DM2 – Delivering Planning Contributions and Infrastructure

59. Policy DM2 sets out the approach that the Council will take in relation to planning obligations. The HBF notes that development can only be required to mitigate its own impact and cannot be

required to address existing deficiencies in infrastructure or services and that planning obligations need to adhere to the statutory tests found in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010. This states that any contributions sought need to be:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

60. It is therefore essential for the Infrastructure Delivery Plan (IDP), which needs to accompany the Local Plan, to clearly show the existing and known deficiencies in the current infrastructure, before reaching any conclusion on the cumulative effects of new development, and any contribution that is needed from new development to mitigate any additional individual and/or cumulative impacts.
61. The HBF also suggests that the policy wording should include the opportunity for negotiation around policy requirements for site specific reasons. This is to reflect any viability challenges identified, as any sites whose circumstances fall outside the parameters of the typologies to be tested may already be unviable under the proposed Local Plan policies.

Local Plan Monitoring

62. 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 provides 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

63. 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.
64. 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 faithfully,

Chris Martin

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