

The Planning Policy Team,
Stockport Metropolitan Borough Council,
4th Floor Stopford House,
Piccadilly,
Stockport,
SK1 3XE.

SENT BY EMAIL

local.plan@stockport.gov.uk

19/12/2025

Dear Planning Policy Team,

STOCKPORT LOCAL PLAN TO 2042 – REGULATION 18 CONSULTATION (OCTOBER 2025)

1. Thank you for consulting with the Home Builders Federation (HBF) on the Regulation 18 draft of the new Stockport Local Plan to 2042.
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 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 Stockport produces a sound Local Plan which provides appropriate policies for the area.

Changes to the National Planning Policy Framework

4. In December 2025 the Government published a consultation on a new National Planning Policy Framework (NPPF). On the basis of paragraph 4 and 8 in Annex A of the draft NPPF this Local Plan, which the Council propose to submit under the current plan making process, will be examined under the 2024 NPPF. 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".

5. Therefore, in preparing the next iteration of this Local Plan the Council may have to have regard to national policies for decision making given that any inconsistency will effectively

render policies in the Local Plan that are inconsistent with the new NPPF redundant as soon as the Local Plan is adopted.

Plan Period

6. The Council is proposing a plan period from 2025 to 2042, which is a period of 17 years. Paragraph 22 of the NPPF 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.
7. The Council's latest Local Development Scheme (LDS) was adopted in September 2025 and outlines that the Council anticipates adoption of the Local Plan by late 2027/early 2028. This would mean there is a possibility that upon adoption, the Local Plan would not be able to provide the 15 year plan period from adoption. Furthermore, any slippage in these timescales will almost certainly mean this core requirement would not be met. Consequently, the HBF considers that the Council should be looking to lengthen its plan period to at least 2043 to ensure that it can meet the minimum plan period from adoption.

Our Vision

8. The HBF considers that the Vision for the Local Plan is important as it clearly sets out how the Council envisages the Borough to be at the end of the plan period.
9. It is unclear in this case however, which elements make up the Vision for the plan. Figure 2 (One Heart, One Home, One Future) sets out some key areas, whilst Figure 3 (Our High Level Principles) sets out some other themes which are intended to run through the Local Plan. The HBF considers this should be consolidated into a single Vision which is clear and succinct.
10. Notwithstanding this, the HBF would also highlight that an important element of the Vision should be for Stockport to meet its housing needs over the plan period in order to ensure that the right number and mix of homes is provided in the right locations. This needs explicitly referencing in the Vision.
11. The HBF also notes that Figure 3 incorporates a 'brownfield first' approach. Whilst the HBF supports the use of brownfield land as part of a wider mix of sites for the development of new homes, a 'brownfield first' approach would seemingly infer some degree of sequential approach to development land which is inconsistent with the National Planning Policy Framework (NPPF, 2024) which instead seeks to encourage and make as much use as possible of brownfield land (paragraphs 89 and 124). This is somewhat different and more flexible than a 'brownfield first' approach. To ensure consistency with the NPPF, the HBF recommends

that references to 'brownfield first approach' are changed so that they better align with paragraphs 89 and 124. This also acknowledges that to meet its need, the Council will need to consider the development of both brownfield and greenfield land.

Our Strategy

12. In line with our comments in relation to the Vision, the Objectives of the Local Plan need to be explicit in stating that the Local Plan will meet the housing needs of Stockport over the plan period and provide an appropriate mix of homes in a variety of locations. This is a fundamental element of the Local Plan and so should be fully integrated into the plan's objectives.

Strategic Policy 1: Spatial Strategy

13. The HBF notes that this policy is broad and overarching in nature. On a general basis, it may be helpful if each part of the policy cross-references the corresponding detailed development management policies elsewhere in the plan.
14. More specifically, Part 1 of this policy outlines that there will be a focus on prioritising opportunities to use brownfield land as far as possible to meet development needs. It then adds that greenfield land will be developed only where it is necessary to make sure that development needs are met.
15. The HBF considers that whilst the Council should be seeking to maximise the use of brownfield land where this is possible and viable to do so (and this is consistent with the NPPF), this does then not mean that it should take a sequential preference over greenfield land, as this is inconsistent with the NPPF which does not advocate such an approach. In fact, this approach appears to be based on the premise that all brownfield land is inherently preferable to greenfield land. This may be the case in some circumstances but clearly not all. Instead, the NPPF emphasises the need to ensure sites are sustainable (be they brownfield or greenfield) and the HBF considers that this should be the key point which is carried over into this policy.
16. In reality, to meet its housing need over the plan period, the Council is clearly going to need a combination of both brownfield and greenfield land in sustainable locations. As such, the HBF recommends that this part of Strategic Policy 1 is reworded accordingly.
17. Part 10 of the policy commits the Council to provide at least 25,371 new homes over the plan period (2025-2042). Paragraph 62 of the NPPF notes that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in Planning Practice Guidance (PPG). On this basis, and using the most up to date affordability and housing stock data, the Council should be developing at least 31,790 new homes over the plan period. This means the Council is not planning to meet its need over the plan period and will be 6,419 new homes short of its

minimum requirement. To date, the Council does not have an agreement with any neighbouring authority to accommodate this shortfall.

18. The HBF has strong concerns regarding this and considers the inability of the Council to plan for enough homes to meet its need is a fundamentally unsound approach. We comment on this in full in our response to Policy HOM1 later on in these representations.
19. The HBF also has strong concerns with the requirement in Part 10 of this policy that within the established built-up area, at least 90% of new homes will be on previously developed land. The use of brownfield targets such as these are not supported by the NPPF and whilst brownfield development should be encouraged, putting in a rigid and definitive target such as this is likely to frustrate housing delivery, as it will artificially restrict the amount of development opportunities in the Borough on what otherwise may be suitable and sustainable sites. This is fundamentally at odds with the NPPF's instructions to significantly boost the supply of new homes (paragraph 61) and along with setting a housing requirement which does not address the Borough's needs, this will serve to further undermine the delivery of new homes to meet the needs of Stockport up to 2042.
20. This part of the policy also references an affordable housing requirement of 50%. The HBF comments on this further in Policy HOM5.

Strategic Policy 2: A strategy for our centres

21. This policy includes *inter alia* the Council's overall strategy for homes within Stockport's designated centres. Part 2 of the policy outlines that Stockport Town Centre has the potential to deliver up to 8,000 new homes by 2042 and that 10,000 further new homes will be delivered in or in close proximity to the Borough's other centres in the same timeframe.
22. Whilst the HBF supports the development of new homes in town centres, this should be part of a wider mix of homes in a variety of locations that meet the needs of the Borough. The HBF considers that the Council will need to ensure the distribution of homes is not overly skewed towards town centre sites as this will have implications for the types, size and tenure of homes provided (including affordable homes) and not necessarily provide the appropriate mix of homes required to meet the housing needs across the Borough.

Strategic Policy 3: Sustainable development in Stockport

23. Paragraph 16 of the NPPF is clear that policies in plans should avoid unnecessary duplication of policies contained elsewhere. Given that Parts 1 – 3 of this policy simply repeat paragraph 11 of the NPPF, they are superfluous and should be deleted.
24. Part 4 of this policy outlines that a minimum of 20% biodiversity net gain is expected through all developments. The HBF comments on the appropriateness of a 20% biodiversity net gain

requirement in response to Policy ENV2 below. However, notwithstanding this, not all developments fall within the mandatory net gain requirement and so the wording of this policy needs to be amended accordingly.

25. This part of the policy also requires that all development takes a sequential approach in relation to risks of flooding from all sources. Again, the sequential approach does not apply to all forms of development, moreover, the HBF notes that policies in relation to this need to reflect the latest changes to the PPG in relation to flood risk and the sequential approach that were published on 17 September 2025 (see Reference ID: 7-023-20220825, 7-027-20220825, 7-027a-20220825 and 7-028-20220825).
26. The HBF comments on the Council's carbon neutrality target in response to Policies CR1 – CR5 below.

Policy ENV2: Enhancing nature

27. Part 2 of this policy requires development subject to mandatory biodiversity net gain (BNG) to provide a minimum 20% measurable biodiversity net gain, prioritising the delivery of net gain on site and secured for at least 30 years.
28. The HBF notes the introduction of mandatory 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. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.” (Reference ID: 74-006-20240214).

29. This indicates that firstly, the Council should avoid replicating the requirements already contained in legislation (the Council will therefore need to check the wording of this policy), secondly, the PPG makes it clear that the expectation is that local planning authorities should seek to apply the 10% BNG requirement contained in the legislation and guidance and any departure from this needs to be justified including the impact of doing this on viability. If the Council therefore wishes to go above the national mandatory requirement of 10%, it will need to provide the appropriate evidence to do so, along with an up to date and suitably robust whole-plan viability assessment. Until this evidence is presented, this part of the Policy ENV2 is unjustified.
30. Part 3 of Policy ENV2 requires major development proposals must use the latest version of Natural England's Urban Greening Factor (UGF) calculator demonstrating how the development will achieve certain scores. The HBF is concerned that this approach may not be appropriate in all circumstances and whilst some sites may be able to easily achieve the scores required, other sites may not be able to for legitimate reasons (due to specific site constraints). The HBF would therefore recommend a much less formulaic approach is considered which is more adaptable to site specific circumstances.
31. Notwithstanding this, any such requirement needs to be accurately reflected in an up to date whole-plan viability assessment.
32. Part 5 of the policy requires development to include a proportionate number of bat roosting and bird nesting facilities relative to the size and scale of the development. For new homes this is at least one integrated bat roosting or bird nesting facility per dwelling.
33. Whilst the HBF can see the benefits of further ecological enhancement, we do not consider it appropriate to require bird and bat boxes to be installed on all new development. The need for such features should be informed at the planning application stage and be based on the necessary evidence in the form of ecological surveys and reports, it should not form a blanket approach through a policy.
34. This is because it would be unjustified to include such features if there are no records or evidence of such species being present in or near the development and it is clear that not all development would provide suitable habitats for such species (for instance with regards to orientation/heights of buildings or external factors such as noise or presence of other species). It is considered that if the Government had intended for such features to be included in all development, it would legislate for this. The cost of these would also need to be factored into any future whole plan viability assessment.

Policy ENV4: Trees, woodland and hedgerows

35. The HBF agrees that the retention and provision of trees on development sites is important and that this is consistent with paragraph 136 of the NPPF. Nevertheless, the Council should ensure that a flexible approach is maintained which recognises that whilst trees should be

retained wherever possible, there may be instances where tree loss is unavoidable (such as the installation of a safe site access, to ensure a coherent design, installation of infrastructure). Tree loss is sometimes also needed for instances where there are diseased trees (to prevent spread). Such losses can be assessed through the preparation of an Arboricultural Impact Assessment.

36. The provision of trees on a development site is also important, however the HBF would again emphasise the need for flexibility and pragmatism with regards to this. The policy contains certain requirements such as the provision of one tree per dwelling on a site and making up for the loss of trees on a 2 for 1 basis. This may not always be practical on every site and the Council will need to ensure that such requirements are consistent with other policies within the Local Plan, such as requiring minimum site densities, the requirement for sites to prioritise on site BNG (this may not be compatible with tree provision due to trading rules) and its UGF requirements.

Policy ENV6: Soils

37. Part 3 of this policy seeks to steer development away from where it may result in the loss of best and most versatile (BMV) agricultural land unless it can be demonstrated that the agricultural value of the land is outweighed by other factors.
38. The HBF considers that whilst the retention of BMV land is clearly important, addressing the housing needs of the Borough is also of high importance and which in many cases should outweigh the loss of BMV land. A proportionate approach also needs to be considered in these cases as it also depends on the loss compared to the wider overall provision of BMV land in and around the Borough.

Policy ENV13: Delivering design quality

39. The HBF considers good design to be an important component of sustainable development and the creation of inclusive places. This policy requires that development must be designed in accordance with the National Design Guide and all other site-specific, borough-wide or local design codes adopted or endorsed by the Council where relevant.
40. Given that none of these documents are part of the development plan for Stockport (they are guidance and not policy), the HBF considers it inappropriate that all development must adhere to these documents. To do so would unjustifiably give these documents development plan status without them going through the scrutiny of a plan examination.
41. The HBF would therefore recommend that the wording of this is changed to 'have regard to' these documents.
42. Part 3 of the policy also requires that a site-wide urban design framework, masterplan or site-specific design code is required in support of planning applications for *inter alia* development

of 50 or more dwellings. Whilst the HBF agrees that masterplanning and design coding can greatly assist in promoting good design, this is usually in relation to larger scale sites which often present greater design challenges in terms of needing to create distinctive areas within a development and ensuring site legibility, coherence and way-finding. The HBF would question the worth of undertaking such exercises on smaller sites which are likely to come forward in single phases and where such design issues are likely to be much less apparent.

Policy ENV14: Making effective use of land for residential development

43. The HBF considers that it is important that development land is used as efficiently as possible and this is consistent with Section 11 of the NPPF. It is noted that this policy sets minimum net density requirements for sites depending on their accessibility to walking routes and public transport.
44. Part 2 of this policy helpfully outlines instances where it may not be possible to meet such density requirements. This flexibility is broadly welcomed by the HBF, however it is still critical that minimum densities are set on a realistic basis. The Council will therefore need to ensure that when all the policy requirements of the Local Plan are considered as a whole (such as BNG, UGF, NDSS, M4(2)/M4(3), parking (cycles and cars), open space, refuse storage) that such densities are in fact achievable.

Policy ENV15: Residential design

45. This policy requires that new homes comply with Nationally Described Space Standards (NDSS) as a minimum, that all new build dwellings meet building regulations part M4(2), and that 10% of new build dwellings on sites of 20 units or more meet the standard in part M4(3) category 3 of building regulations.
46. In relation to the NDSS specifically, this is intended by the Government to be optional and can only be introduced where there is clear evidence. The PPG identifies the type of evidence required to introduce such a policy (Reference ID: 56-020-20150327). It states that where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies and this should take account of need, viability and timing. The intention is therefore that this is a 'need to have' rather than a 'nice to have'.
47. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS, they would have made these standards mandatory and not optional.
48. In relation to requirements for M4(2) and M4(3) standards, the PPG again is clear that such standards are optional and that evidence needs to be provided if such standards are to be adopted. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people but on the basis that this is fully justified. The PPG details the evidence needed to be provided to justify their inclusion. This includes 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).

49. Whilst the Council has provided some evidence in its Housing Needs Assessment (HNA, 2025), the HBF considers that this does not address all the PPG criteria and crucially it will need to be shown that the introduction of these optional standards is viable. In relation to M4(3) standards in particular, the policy requirement of 10% does not align with the 4% suggested in the HNA.

Policy CR1: Climate resilience, mitigation and adaptation

50. The HBF supports measures to encourage climate resilience, mitigation and adaptation. For clarity and consistency, the policy should seek to use national sustainability standards where possible. This will ensure that such standards are readily understood by developers and does not add to the cost or burden of delivering the new homes that Stockport needs.
51. Part 4 of this policy outlines that the requirements in Policy CR1 and CR2 must be demonstrated by the provision of a 'climate action statement', with the level of detail being proportionate to the scale of development proposed.
52. The HBF would question whether this should form part of the policy itself and that instead, the requirement should form part of the Council's planning application validation list, which can outline more fully what is required and which planning applications it should apply to. This will also ensure that the need for the document is consistent with paragraph 45 of the NPPF, in that it is only required where it is needed to make a decision on a planning application.

Policy CR2: Energy efficiency, resources and carbon

53. This policy seeks to introduce a number of differing emerging efficiency standards for Stockport to apply over the plan period.
54. The HBF continues to recognise the need to move towards greater energy efficiency, but this should be 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.
55. 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. This needs

to ensure that development remains viable, and the impact on housing supply and affordability is considered in accordance with the NPPF.

56. As such, the HBF considers that this policy should not be required, as the move towards ever more efficient buildings and net zero is set nationally by the Government through Part L of the building regulations and the forthcoming roll-out of Future Homes Standards.
57. Part 6 of this policy requires all new residential development to achieve the optional requirement for water efficiency contained in Part G2 of the building regulations. The HBF would highlight that as set out in the NPPF (paragraph 32), all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned.
58. Therefore, a policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of Part G2 (110 litres per person per day), then the Council should justify doing so by applying the criteria set out in the PPG.
59. The PPG states that where there is a *'clear local need, Local Planning Authorities (LPAs) can set out Local Plan Policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres per person per day'*. The PPG also states that *'it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement'* (Reference ID: 56-014-20150327 and 56-015-20150327).
60. The PPG notes evidence could include the 2021 data on water stressed areas (from the Environment Agency), Water Resource Management Plans and River Basin Management Plans (Reference ID: 56-016-20150327).
61. The North West and Stockport in particular are not considered to be an area of water stress as identified by the Environment Agency and no other evidence has been presented to support a move to the higher technical standard. Until such evidence is provided and also reflected in a whole-plan viability assessment, the HBF does not support this part of the policy.

Policy CR3: Renewable and low carbon energy development

62. It is noted that Part 2 of this policy outlines that development of buildings must maximise opportunities for renewable energy generation from solar technology; aiming for the equivalent of a minimum of 40% of roof space being covered by solar photovoltaics. 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.

63. Instead, and as outlined in our comments in relation to Policy CR2, the requirements for items such as photovoltaics should be driven by the national standards in the form of building regulations and the emerging Future Homes Standard. This ensures a consistent, clear and readily understood requirement across the country, which will assist in boosting housing delivery.

Policy CR4: Heat networks and cooling

64. As part of this policy the Council is seeking that applicants should make best efforts to install equipment that is capable of connection to a wider network at a later date and which could serve, or could be easily adapted to serve, that wider network if and when required. Furthermore, where there are developments on sites of 150 or more dwellings that utilise space and water heating, these should install a heat network to serve the development or connect into an available or proposed heat network.

65. The HBF considers that it is important that any policy in relation to heat networks and cooling 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.

66. The Government's Heat Network Zoning Overview Paper (January 2024) confirms this and notes exemptions such as where it would not be cost-effective to connect to a heat network or where a better low carbon solution exists.

67. This policy therefore needs to be reworded so that whilst this can be encouraged, it should not be a requirement for development sites, as other ways to decarbonise heat can also be explored.

Policy CR5: Retrofit and re-use of buildings

68. Part 3 of this policy seeks to encourage the re-use and renovation of buildings rather than demolition and rebuild, to reduce the use of new resources and their associated embodied carbon emissions.

69. The HBF supports the need to reduce such emissions, although this policy needs to examine carbon emissions in the round by also looking at the operational phase of development. This is because sometimes it may not be feasible to effectively retrofit existing buildings to make them operationally more efficient and so while there may be embodied carbon savings by retaining a building, operationally (and in the longer term) it may be more beneficial to develop a new building which is much more energy efficient. These two factors therefore need to be balanced appropriately when assessing the merits of demolishing a building.

Policy HOM1: Delivering new homes

70. This policy sets a housing target of 25,371 new homes over the plan period. As outlined in our response to Strategic Policy 1, this compares to a minimum number of new homes needed through the Standard Method of 31,790 over the plan period. This means the Council is not planning to meet its minimum need over the plan period and will be 6,419 new homes short of this. Furthermore, the Council does not have an agreement with any neighbouring authority about accommodating the shortfall.
71. In light of this, the HBF considers the Council's approach to be fundamentally unsound as it is not planning to meet the minimum housing needs of the Borough over the plan period and contribute sufficiently to what is required for the Government to meet its 1.5 million new homes target by the end of this parliament.
72. The NPPF and PPG are clear that it is expected that local planning authorities are to meet their minimum need defined through the Standard Method (be it within their boundaries or with an agreement with a neighbouring authority). The PPG in particular states:
- "The standard method should be used to assess housing needs. However, it is recognised that there are some specific circumstances in which an alternative approach could be justified, for example as explained at paragraph 014 below."* (Reference ID: 2a-003-20241212).
73. The paragraph (014) referenced is outlined below:
- "Where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority, or local authority areas where the samples are too small, an alternative approach may have to be used."* (Reference ID: 2a-014-20241212)
74. This clearly does not apply in the case of Stockport and so there is no justification from national planning policy or guidance for the Council's approach.
75. The HBF also notes that the Council has sought to justify its position through its paper titled *Addressing our development needs* (October 2025). This highlights a number of reasons as to why the Council considers that it cannot meet the Borough's minimum housing need over the plan period. This is largely due to the Council believing that it does not have sufficient development sites within its boundaries to meet this need.
76. Having examined this paper, the HBF would make the point that some of the measures that the Council has put in place have likely restricted the number of development opportunities within the Borough and that a re-examination of these is likely to identify additional sites to help meet its minimum need over the plan period.

77. This includes re-thinking its 'brownfield first' approach which is inconsistent with the NPPF and is clearly hampering the ability for the Council to consider as wide array of sites as possible. This is evident in paragraph 29 of the paper which states:

"The brownfield first approach was developed in response to the increasing pressure to re-lease greenfield and Green Belt land for new housing development in Stockport, to ensure an efficient and sustainable use of land."

78. As outlined earlier in these representations, the HBF considers that the Council will need a mixture of brownfield and greenfield sites if it is to meet its minimum need and it makes little sense to artificially restrict the use of greenfield land (as also evidenced by Part 1 of Strategic Policy 1) if this results in the minimum housing need for the Borough not being met.

79. The HBF also notes that the Council has undertaken a review of their Green Belt and this is found in its current Green Belt Assessment (October 2025). Whilst this examines all of the Green Belt which falls within Stockport's boundaries, the HBF would observe that some of the Green Belt parcels are large in size and would highlight that a finer grain analysis may be required in order to identify further development opportunities.

80. The HBF also notes that the Green Belt Assessment itself has sought to classify many of the settlements within the Borough as part of a 'large built-up area' rather than villages in their own right (see paragraph 3.34). Given the distinction within the PPG with regards to villages and 'large built-up areas' and how these are assessed in Green Belt terms in the PPG (Reference ID: 64-005-20250225), this then has an outsized effect on how individual Green Belt parcels are assessed. The approach of classifying settlements as part of 'large built-up areas' does not appear to be based on any detailed analysis, rather it appears to be high-level in nature.

81. The HBF therefore considers that whilst the Council has set out reasons as to why it cannot meet its minimum housing need over the plan period, these reasons are not justifiable and further analysis is required to identify suitable development opportunities to meet its minimum need.

Policy HOM2a: New residential communities

82. Whilst the HBF does not comment on specific sites, it is noted that this policy provides a minimum number of dwellings required for each housing allocation. It is unclear how these numbers have been calculated and whether it has taken into account the on-site policy requirements found elsewhere in the plan.

83. Nevertheless, given that the specific number of dwellings that can be provided on each site will only be apparent once a detailed design is undertaken, which can assess capacity in relation to site specific opportunities, constraints and policy requirements, the HBF would

recommend that 'minimum number of dwellings' should be amended to 'approximate number of dwellings'.

Policy HOM2b: Site specific requirements

84. This policy outlines the general requirements for site allocations and whilst the HBF does not comment on specific sites, there are a number of broad themes in this policy which it wishes to comment on.
85. Part 3 of the policy requires each allocation to provide a design code. As outlined in our response to Policy ENV13, whilst the HBF agrees that the use of design codes can be helpful in planning for larger scale development which will take place over multiple phases, it may not be the most appropriate solution for smaller sites which may be delivered in a single phase. In these cases, a simpler overall masterplanned approach may be more appropriate.
86. This part of the policy also compels developers to involve the local community in shaping development proposals and continue to involve them as the scheme is delivered. The HBF considers it is good practice to involve the community in planning for new development, however compelling applicants to do so is inconsistent with the NPPF. It is also the case that this policy may not be able to be addressed if the community in question does not wish to engage with the developer, or has unrealistic expectations on what a development can deliver. As such, the HBF considers that this part of the policy should be reworded so as to encourage such involvement where possible.
87. Part 4 of the policy covers affordable housing and notes that those sites which are to be released from the Green Belt and allocated for new homes must deliver a minimum of 50% affordable housing. Whilst paragraph 67 of the NPPF puts forward that such sites require at least 50% of housing to be affordable (as part of the 'Golden Rules'), this is subject to viability considerations. Whilst an increase in affordable homes is generally welcomed by the HBF, the Council will need to clearly demonstrate through its whole-plan viability assessment that this can be achieved without making development unviable.
88. Part 5 of this policy requires a housing mix that is in accordance with Policy HOM4. We comment on this more widely in our response to Policy HOM4 below.

Policy HOM4: Housing mix

89. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements; requiring a mix that does not consider the scale, location or characteristics of the site; requiring a mix that does not consider the viability of the site; or requiring the applicant to provide significant amounts of additional evidence.

90. It is noted in this case that Part 3 of the policy does include some criteria which the Council will have regard to when examining housing mix. The HBF generally supports this but considers that commercial and viability considerations should also be included alongside site and context specific factors. Our comments with regards to density are outlined in our response to Policy ENV14.

Policy HOM5: Affordable Housing

91. The HBF supports the provision of affordable homes as part of a wider mix of housing that meets the needs of the entire Borough. It is noted that the HNA outlines that the annual shortfall of affordable homes in the Borough is 1,305 dwellings (paragraph 6.6). This is nearly 70% of the total housing need established through the Standard Method (1,870 dwellings per annum).

92. The overall strategic affordable housing target in the policy is 50% of the total provision. It is unclear as to how this figure has been calculated with reference to the need in the HNA. The explanatory text makes reference to an annual affordable housing shortfall of 1,035 dwellings and it is not apparent where this number originated from. The Council will need to explain this approach clearly so that the policy can be justified. In any event, it is worth highlighting 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). Therefore, the HBF considers that the Council should also be taking this affordable housing need into consideration as part of their overall housing requirement.

93. The policy continues by providing separate bands of affordable housing requirements depending on a site's location/status (15% - 50%). The explanatory text makes reference to information in the HNA as justification for these bands. The Council will be aware however that alongside need, it also needs to take into account viability/deliverability alongside the impact of providing other infrastructure when setting affordable housing requirements (see paragraph 35 of the NPPF). The HBF therefore expects that the whole-plan viability assessment will need to ensure that these affordable housing requirements do not undermine the viability of development.

94. Related to this, the affordable housing requirement bands found within the policy outline that these must be reflected in the cost of land. That is most likely to be the case anyway, however that in itself does not guarantee that the site can be delivered, as factoring in the affordable housing requirement may result in a negative land value, or a land value which is not attractive enough for the landowner to sell. Consequently, it is the HBF's view that whilst a robust whole-plan viability assessment needs to show that the affordable housing requirement does not undermine delivery, there should still be an option for an applicant to challenge the requirement in cases where it would make a scheme unviable. This should generally be the

exception, rather than the rule but is needed for flexibility and to help ensure delivery of development across the plan period.

95. Part 5 of the policy details the Council's tenure requirements for affordable housing. This is a 50/50 split between shared ownership and social rent, except in town centre and inner urban areas where it is 25% social rent and 75% shared ownership. The policy also mentions First Homes can be provided where they can genuinely deliver affordable homes.
96. 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.
97. The explanatory text to this policy outlines that First Homes are the Government's preferred discounted market tenure. The HBF is uncertain whether this is the case given that the most recent NPPF (December 2024) has changed First Homes from a mandatory tenure, to one which is now entirely voluntary.
98. Given the explanatory text appears to be sceptical about the effectiveness of First Homes as an affordable tenure, the HBF would instead encourage the Council to explore a wider range of other affordable tenure options (see Annex 2 of the NPPF) to ensure all needs are met within the Borough.

Policy HOM7: Housing for older people and specialist accommodation

99. Part 2 of this policy requires that housing provision specifically targeted at older people, should form part of the overall mix within new residential developments.
100. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people. Whilst there is general support for such development, the HBF would 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.
101. 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.

Policy HOM12: Self-build and custom build homes

102. This policy states that on sites of 100 or more dwellings, the Council will require a minimum of 5% of the plots to be made available as serviced plots suitable for self and/or

custom-build.

103. The HBF does not consider that requiring a proportion of self-build or custom-build housing on sites of 100 or more dwellings is the correct approach. The HNA outlines that in the period 2016 – 2022, a total of 130 individuals and 3 groups have expressed an interest in self-build (paragraph 4.79). The HBF would consider that such limited demand does not necessitate such a requirement.
104. It is also considered unlikely that the provision of such plots on new housing developments can be co-ordinated with the development of a wider site. At any one time, there are often multiple contractors and large machinery operating on-site and therefore from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. For self-build in particular, the HBF also notes that many would prefer not to be on a larger residential development.
105. Instead, the HBF advocates for self-build/custom-build housing policies that encourage such development by setting out where it will be supported in principle and if necessary, identifying smaller sites for such developments (as outlined in Part 3 of this policy). This better reflects the demand expressed in the HNA.
106. The requirement in this policy for a design code to be provided for development that would result in 5 or more self/custom-build units on a single site also requires further explanation. This is because the accompanying text to the policy states that a key attraction of self and custom build developments is the ability for people to create their own bespoke dwellings that will meet their specific needs. The Council therefore will need to explain how it intends to balance the creation of bespoke dwellings with adherence to a design code.

Policy INF1: Infrastructure provision and developer contributions

107. 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.
108. 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.

109. Alongside this, it is also crucial that developer contributions (along with other policy requirements) are tested thoroughly in a whole-plan viability assessment to establish that their provision will not undermine the delivery of development. It is noted that Part 5 of 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.
110. Part 6 of the policy also outlines that where developer contributions have been negotiated through a site-specific viability assessment, a clawback mechanism will be incorporated into a legal agreement. 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.

Policy INF2: Digital Telecommunications and Infrastructure

111. Part 2 of this policy requires relevant major developments to be served by Full Fibre to the Premises (FTTP) technology and include ducting capable of accommodating more than one digital infrastructure provider to enable future upgrades.
112. The HBF generally considers that digital infrastructure is an important part of sustainable development within an area. However, the inclusion of digital infrastructure such as certain broadband/fibre specifications is not within the direct control of the development industry, and as such it is considered that this part of Policy INF2 could create deliverability issues for development and developers.
113. 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. The house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand. The HBF considers that in seeking to provide FTTP technologies to homes, the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure.
114. As the Council is no doubt aware, Part R of the building regulations requires all new build dwellings to be installed with the relevant physical broadband/fibre infrastructure connections subject to a cost cap of £2,000 per dwelling. These requirements mean that there is no need for the inclusion of this part of Policy INF2.

Policy INF3: Flood Risk

115. The HBF does not object to this policy, however it is important that it reflects the latest changes to the PPG in relation to flood risk and the application of the sequential test (see Reference ID: 7-023-20220825, 7-027-20220825, 7-027a-20220825 and 7-028-20220825).
116. The Council will need to check the wording of the policy and amend as appropriate.

Policy INF6: Fresh water and wastewater infrastructure

117. The HBF has significant concerns regarding this policy as supply of water and wastewater infrastructure is not something which developers control. The Council will be aware that water companies are subject to statutory duties under Section 37 and 94 of the Water Industry Act 1991 (WIA 1991). Section 37 of the Act imposes a statutory duty on all water companies to provide and maintain adequate infrastructure and potable water supplies.
118. Section 106 of the WIA 1991 confers the power to connect to a public sewer. Section 106(1) states that the owner of any premises or the owner of any private sewer which drains premises, shall be entitled to have its drains or sewer communicate with the public sewer of any sewerage undertaker and therefore discharge foul water and surface water from those premises or that private sewer.
119. The HBF agrees that there must be sufficient water capacity and wastewater infrastructure to serve new development. However, it is the responsibility of water companies (in this case United Utilities), working with local authorities and the Environment Agency, to plan for the future demand for water services relating to the development requirements proposed in local plans, not developers. If the water company is unable to supply those needs, this needs to be disclosed in the Water Resource Management Plan.
120. This approach is also the one advocated in the PPG, which outlines the need for early discussion with water and sewage companies to help ensure proposed growth is reflected in company business plans and long term water resource management plans (Reference ID: 34-002-20140306). This is reiterated elsewhere in the PPG (Reference ID: 34-016-20140306) which states:
- “Planning for the necessary water supply would normally be addressed through authorities’ strategic policies, which can be reflected in water companies’ water resources management plans. Water supply is therefore unlikely to be a consideration for most planning applications”.*
121. As such, if there is insufficient capacity to support new development, this will need to be addressed with sites for new or enhanced water and wastewater infrastructure being identified in the Local Plan and should not be a matter left to be addressed at the planning application stage.

Policy INF7: Integrated Transport Network

122. Part 5 of this policy seeks to ensure that new developments have access to electric vehicle charging infrastructure.
123. The Council will be aware that mandatory requirements for electric vehicle charging infrastructure is now set out in Part S of the building regulations and therefore do not require to be included in this policy. As such the HBF recommends that Part 5 of this policy is deleted.

Policy INF9: Walking, wheeling and cycling

124. Part 2b of this policy requires that design of cycle parking accords with local and national design standards, including Local Transport Note (LTN) 1/20.
125. 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.
126. 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 INF12: Public rights of way and strategic recreation routes

127. The HBF considers the requirements of this policy are already covered in rights of way legislation (including the Countryside and Rights of Way Act 2000 and Highways Act 1980).
128. As such the HBF cannot see any justification for the inclusion of this policy in the Local Plan; especially given that decisions with regards to public rights of way lie outside the planning system.

Policy INF15: Vehicle parking and infrastructure

129. In a similar way to Policy INF7, Part 2 of this policy covers requirements for electric vehicle charging infrastructure. As outlined previously, this requirement is now nationally mandated through Part S of the building regulations and therefore does not need to be repeated in this policy.

Monitoring

130. 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

131. 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.

132. 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