

SENT BY EMAIL

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Dear Sir/ Madam

West Yorkshire Mass Transit – Joint Development Plan Document (Regulation 18)

1. Thank you for consulting with the Home Builders Federation (HBF) on the Regulation 18 draft of the West Yorkshire Mass Transit Joint Development Plan Document (DPD) which is being prepared by the West Yorkshire Combined Authority (WYCA).
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 key themes and areas of the DPD. The HBF is keen to ensure that the DPD is produced in a robust and sound manner that will assist in the preparation of the wider Spatial Development Strategy (SDS) for West Yorkshire and each local planning authority's emerging development plan.

Overall Comments

4. The HBF considers that a joined-up approach to Mass Transit across the WYCA area is crucial in unlocking future growth opportunities and securing sustainable patterns of development. On this basis, a joint DPD is logical and ensures a consistent approach across all of the constituent local planning authorities.
5. Given that once adopted, this will form part of the development plan, the WYCA will need to explain how the DPD will form part of the decision making for future planning applications in the area. This is especially important given that each constituent local planning authority is at a different stage in their local plan-making and so there is likely to be some degree of inconsistency in how the policies of this DPD will apply *vis-à-vis* the existing/emerging development plans in those areas; ie. some may be well aligned to the DPD and others will not be. Similarly, the relationship between the DPD and the emerging SDS will also need to be thoroughly explain and how these two documents will sit together for decision making purposes.

Vision and Objectives

6. The HBF supports that the Vision recognises that the Mass Transit network provides an opportunity to unlock housing growth in West Yorkshire. The WYCA will be aware of the need to plan for a significant uplift in new homes across West Yorkshire and this DPD has the potential to be able to help facilitate this.
7. The Vision continues to state that the Mass Transit network contained in the DPD will provide a clear spatial focus to help deliver new homes. Whilst the HBF agrees with this, the WYCA will need to ensure that this marries up with other considerations which will drive the location of new housing development in West Yorkshire. The HBF's view is that the key driver for housing growth is to provide this where the need is identified, with then the necessary infrastructure being put in place to support this. The HBF's concern with the approach in the DPD is that spatial focus becomes too 'transport-led' rather than 'need-led' and consequently there is a mismatch between the two when instead the two should be complementary.
8. In a similar manner, Strategic Objective 1 (SO1) seeks to integrate transport and spatial planning. The HBF agrees that this is a desirable objective, however it is how this objective is undertaken which is crucial. It is the HBF's view that this needs to be examined in a holistic way and the danger of examining transport matters ahead of more general spatial matters is that the approach becomes too transport focussed at the expense of other key factors which need to be considered in setting the spatial strategy for West Yorkshire.

Spatial Options

9. The consultation document presents two spatial options:
 - Option A: Maximise the benefits of Mass Transit through joined up approach to spatial planning across West Yorkshire (Preferred option for joint Development Plan Document).
 - Option B: Rely solely on Local Plans to secure the benefits of Mass Transit (Business as Usual).
10. The HBF considers the joined-up approach in Option A is clearly preferable, however this is on the basis that this DPD itself is able to complement (rather than lead) the overall spatial strategy for West Yorkshire.

Policy Theme 1 – A place-based approach to transit-orientated development

11. The HBF recognises the need to have well connected places and the important role this plays in creating sustainable development, however the transit-oriented approach runs the risk of prioritising locational efficiency over actual housing need.
12. The HBF considers that a more sustainable way in which to plan for future growth would be to establish housing need alongside this DPD. This will ensure that the Mass Transit network corresponds to the locations where need is found and that the DPD can reflect the areas and types of homes where people wish to live, rather than attempting to fit homes around a pre-determined transport network.

Policy Theme 2 – Creating a seamless, integrated transport network

13. The HBF supports the concept of creating a more comprehensive and reliable transport network with more frequent services. The consultation document states that:

“It means fully aligning the route planning and implementation of Mass Transit with existing and planned development and regeneration sites, so that the physical development of the region is integrated with the transport network and focuses on delivering inclusive growth and environmental resilience. This will require a more conscious strategy to connect planned development with transport hubs through improved active travel links for the “first and last mile”, as well as improving the overall quality of place.”

14. This approach is of course supported, however it relies on the constituent authorities having up to date development plans which clearly outline where planned development is located (or alternatively having an up-to-date SDS in place). This is currently not the case and so it is difficult to see how this DPD can effectively align with the overall spatial approach in West Yorkshire at this point. As outlined earlier in these representations, the risk is that this DPD, in running ahead of other development plan documents, simply provides a very narrow ‘transport-led’ approach to development which does not benefit from an analysis of where housing need is actually located in West Yorkshire.

Policy Theme 3 – Delivering inclusive growth

15. Whilst the HBF understands the rationale of this policy theme, the danger of using the Mass Transit network to deliver growth is that it inherently creates a ‘two-tier’ system, with communities of West Yorkshire that are well connected to the Mass Transit network benefiting from this, whilst those communities which do not connect to the Mass Transit network being left behind.

16. Similarly, it risks creating a further divide between well connected urban areas and rural areas which are likely to remain isolated from the Mass Transit network.
17. As outlined in our response above, this further emphasises the need to consider the wider spatial needs of the area, rather than creating a strategy that is purely transport-led.

Policy Theme 4 – Climate

18. The HBF agrees that a Mass Transit network can play a key role in reducing greenhouse gas emissions and tackling climate change. The WYCA will be aware that in tackling climate change, the Government considers that plan-makers should follow national standards set through building regulations and other national policy, rather than working to their own local standards. This allows for a consistent approach across the country. The recent draft National Planning Policy Framework (NPPF, 2025) confirms this direction of travel (see draft Policy PM13).
19. Consequently, any policy which comes forward in the DPD in relation to climate change, will need to be consistent with national standards.

Policy Theme 5 – Protecting and enhancing the natural environment

20. The WYCA is correct to identify that the Mass Transit network presents both a challenge in being able to adequately protect the natural environment and an opportunity to enhance it. The HBF notes that the policy theme explores different but inter-related areas of the natural environment (eg. Habitats Regulation Assessment, protected species, biodiversity net gain).
21. When refining this policy area, the HBF seeks that the Council distinguishes between these areas but also acknowledges the relationship between them and ensure that any policies are consistent with those set at a local level. For biodiversity net gain (BNG) in particular, the WYCA will need to be mindful that the Planning Practice Guidance (PPG) is clear that the DPD should not replicate the requirements already found in the statutory framework (Reference ID: 74-006-20240214).

Policy Theme 6 – Coordination of funding and investment on the Mass Transit network

22. The HBF considers that if the Mass Transit network is to be successful, the DPD needs to be clear on how this is to be funded. It is concerning that the DPD does not have a clear idea on funding streams, yet at the same time, could have an outsized influence on the overall spatial approach for West Yorkshire.

23. The consultation document mentions the potential to impose a strategic level Community Infrastructure Levy (CIL) specifically for the Mass Transit network (akin to the Elizabeth Line in London) and whilst the HBF would not object to the principle of this, it needs to be very carefully considered in terms of the impact on viability of development across West Yorkshire. This would not only need to factor in the viability implications of any strategic CIL tariff in isolation, but also the cumulative effect of this, plus any locally set CIL tariff and/or other planning obligations. This will need to make sure any additional obligations for developers does not threaten the delivery of the homes which West Yorkshire needs.

Policy Theme 7 – Safeguarding and delivery of Mass Transit

24. The HBF sees the merit in safeguarding land for providing the Mass Transit network for the reasons outlined in the consultation text. However, such safeguarding of land should either be time limited and/or contingent on the funding being available, as this will avoid the long-term sterilisation of land which could otherwise be put forward for other sustainable uses. The WYCA should also focus on only safeguarding land which is strictly needed, rather than safeguarding larger swathes of land, most of which is unlikely to be needed for development purposes.

Future Engagement

25. The HBF trusts that the WYCA will find these comments useful as it continues to progress this DPD. We would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

26. The HBF would like to be kept informed of all forthcoming consultations upon the DPD and associated documents. Please use the contact details provided below for future correspondence.

Yours faithfully,

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