

Revised Draft Local Plan consultation  
Spatial Planning  
Salford Civic Centre  
Chorley Road  
Swinton  
M27 5BY

SENT BY EMAIL  
[plans.consultation@salford.gov.uk](mailto:plans.consultation@salford.gov.uk)  
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Dear Sir / Madam,

## **SALFORD REVISED DRAFT LOCAL PLAN**

Thank you for consulting with the Home Builders Federation on the Salford City Council Revised Draft Local Plan.

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.

The HBF is keen to work with the Council in order to achieve an adopted local plan which enables an increase in the rate of house building across Salford. The Council should also be aware that the HBF has also submitted comments upon the Greater Manchester Spatial Framework (GMSF), which has been consulted upon in a similar timeframe.

### **Relationship with the GMSF**

Paragraph 1.5 of the Plan states that the Local Plan will need to be consistent with the GMSF, it is noted that this is slightly different language to that used in the GMSF which states in paragraph 1.35 that once the GMSF is finally agreed, all the Greater Manchester district local plans will be required to be in general conformity with it. Paragraph 1.5 also states that all decisions in relation to Green Belt will be made through the GMSF and not through the Local Plan.

The draft GMSF states that Salford will continue to be an appropriate location for the highest levels of new housing due to its central location, good public transport connections, proximity to the main concentrations of employment and leisure opportunities and ability to deliver high density developments. The draft GMSF goes on to set out the proposed distribution of new housing, with which it expects local

authorities to be broadly in accordance with. For Salford it proposes an annual average of 1,720 dwellings each year or 32,680 dwellings between 2018 and 2037. It should be noted that the HBF response to this document considers that an increase to the housing requirement for Greater Manchester would be appropriate and highlights that the HBF would be willing to work with the Mayor to call for more investment in the combined authority to increase housing delivery.

### **Strategic Objectives**

The HBF are generally supportive of objective 5 which looks to enable more households to access suitable and affordable housing and sets a key target of providing at least 32,680 net additional homes along with a 5-year supply of deliverable homes.

### **Policy CC1 Climate change**

This policy states that new residential schemes will be required to *'exceed the fabric energy efficiency required under Part L of the Building Regulations 2013 by at least 19%, and achieve a higher standard than is required by any subsequent revisions to Building Regulations'*.

The HBF does not generally object to encouragement for the need to minimise the carbon emissions, however, it is important that this is not interpreted as a mandatory requirement, as it appears to be in this policy. Which it is noted, is it at odds with many other elements of the policy which appear to be a list of potential approaches to addressing climate change challenges, and are not 'required'. The HBF consider that any mandatory requirements would be contrary to the Government's intentions, as set out in Fixing the Foundations and the Housing Standards Review, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards. The Deregulation Act 2015 was the legislative tool used to put in place the changes of the Housing Standards Review. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes. Transitional arrangements were set out in a Written Ministerial Statement in March 2015. The HBF recommend that the Council ensure that this policy is justified and consistent with national policy. The potential cost of the requirements of this policy needs to be taken into consideration. There are concerns that requirements such as these could lead to the non-delivery of homes in areas where development is intended to be focused. The HBF considers that this requirement should be removed.

The policy also seeks to incorporate electric vehicle charging points into new developments and to promote greater water efficiency. Within this policy these elements appear to be part of a generally optional list of potential approaches to addressing the challenges of climate change. No detail is provided within this policy in relation to the levels of provision of electric vehicle charging points or water efficiency. Although it is noted that there are additional policies on these elements provided within Policies A11 and WA3.

### **Policy H2 Scale and phasing of housing development**

This policy seeks to provide at least 32,680 net additional dwellings over the period 2018 to 2037, at an average of 1,720 dwellings each year. As is noted in relation to the HBF response to the draft GMSF, the HBF consider that the housing requirement for the Combined Authority should be increased, it is likely that this will also lead to a need to increase the housing requirement for Salford.

The policy goes on to acknowledge that housing delivery may go through peaks and troughs. However, the policy states that *'if any cumulative shortfall in housing delivery arises compare to the average per annum requirement of 1,720 net additional dwellings then this will be addressed over the remainder of the plan period'*. The HBF has concerns about this approach and consider that any shortfall should be addressed within the shortest time possible and preferably within the next five years, to ensure that there are sufficient homes to meet the outstanding needs.

### **Policy H3 Distribution of housing**

This policy sets out the approximate distribution of new dwellings to be provided within Salford, it goes on to state that higher levels of development in individual areas will be permitted where this is consistent with the overall strategy of the plan.

The HBF note and support the flexibility provided by the wording of this policy. It is important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas. It is also important that it is able to support the type and mix of housing that is required by other policies within the plan and that an appropriate level of supply is made available to ensure these homes can be delivered.

### **Policy H4 Type of housing**

This policy sets out the mix of new dwelling types required in Salford. It states that within the rest of the city at least 80% of the net increase in dwellings in the form of houses.

The HBF understands the need for a mix of dwelling types 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 of the site; or the need to provide additional evidence. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

### **Policy H5 Size of dwellings**

This policy provides a table with an approximate mix of new dwelling sizes required within Salford, it states that all developments providing net additional dwellings shall deliver a range of dwelling sizes in terms of the number of bedrooms.

Again, the HBF understands the need for a mix of dwellings sizes and is generally supportive of providing a range and choice of homes. And again, the importance of ensuring that the policy is workable, and homes are delivered would be stressed. The

HBF recommends a flexible approach is taken regarding the size of dwellings which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

This policy also contains a requirement for all dwellings in new build developments to meet as a minimum the nationally described space standards (NDSS). PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that *'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- ***Need*** – *evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- ***Viability*** – *the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- ***Timing*** – *there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.*

The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. The HBF consider that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

### **Policy H6 Housing density**

This policy sets out the minimum densities that new development should achieve, it also set out when lower densities may be considered acceptable. The flexibility provided by this policy in relation to certain exceptions is noted, this will allow developers to react to some site specific issues. However, further amendments could be made to create greater flexibility to allow developers to take account of the evidence in relation to market aspirations and viability.

The Council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, space standards and parking provision will all impact upon the density which can be delivered upon site.

### **Policy H7 Affordable Housing**

This policy states that all developments that provide 10 or more net additional dwellings, or are on a site of 0.5 hectares or more in size and provide any number of dwellings, shall deliver at least 20% of those dwellings as affordable housing, with higher requirements in premium, high and mid/high residential value area. It is noted that the reference to the location of the definition of 'affordable housing' will now need to be updated.

The justification for the policy states that having regard to the characteristics of households in need and the existing tenure mix, providing 10% of affordable homes

as homes for affordable home ownership in line with the NPPF, would significantly prejudice the ability to meet affordable housing needs in the city and is not considered appropriate. Given the viability issues identified, the HBF consider that it may be appropriate for the Council to give this statement further consideration as more viable forms of development may need to be considered.

The HBF does not dispute the need for affordable housing within Salford and indeed supports the need to address the affordable housing requirements of the borough. The 2019 Greater Manchester SHMA identifies a need for 613 affordable homes per annum in Salford. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. Paragraph 34 of the NPPF (2019) established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened. However, the 2019 Viability Assessment appears to show that the 20% affordable housing requirement is not viable for a significant number of development typologies within Salford. For example, no types of development in the low value areas are viable; no types of development in the low/mid value areas; high density apartments and mid-density apartments in the mid value areas; and high density apartments in the mid/high value areas are not viable. It is also noted that whilst the policy looks for a proportional split of tenure as social rent 37.5%, affordable rent 37.5% and shared ownership 25%, the Viability Report has been based on social rent 25%, affordable rent 25% and shared ownership 50% for the mid value, mid/low value and low value areas, suggesting that the viability issues could actually be worse.

### **Policy H9 Housing land supply**

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

### **Policy H13 Self-build and custom housebuilding**

This policy states that all development of 100 or more houses will be required to provide at least 5% of the total house plots in the form of serviced plots for sale to self-build and custom housebuilders. Many of our members will be able to assist the custom build sector either through the physical building of dwellings on behalf of the homeowner or through the provision of plots for sale to custom builders. The HBF are, therefore, not opposed to the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. However, the HBF have concerns in relation to this policy approach which only changes the house building delivery mechanism from one form of house building company to another without any consequential additional contribution to boosting housing supply. The HBF would encourage the Council to engage with landowners and to work with custom build developers to maximise opportunities.

### **Policy A11 Electric vehicle charging points**

This policy requires provision for electric charging points for dwellings with a garage or driveway with at least one dedicated charge point per dwelling, for residential developments with shared parking areas, provision will be at least one charge point per ten dwellings. In order to ensure that this policy can deliver at the rates proposed and not impede on the delivery of homes, the HBF would encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that has sufficient capacity to meet any standards and requirements set by the Council in this policy and others.

### **Policy EG1 Sustainable energy in new development**

This policy states that all residential development: Exceed the fabric energy efficiency required under Part L of the Building Regulations 2013 by at least 19%, and exceed the standard required by any subsequent revision to Part L. The HBF concerns in relation to this element of the policy have already been set out in relation to Policy CC1.

This policy also goes on to require developments involving ten or more dwellings to connect into the heat network. The HBF do not consider that Salford should be requiring developments to connect to or restricting the use of particular heating methods. The HBF consider that consideration needs to be given to the justification to this policy. If the policy is to be taken forward then consideration needs to be given not just to whether the development is technically viable but also financially viable and subject to viability testing. The HBF also consider that this policy may cause issues for future occupants as it is restricting future consumer choice to that particular provider of heat.

The HBF consider that the cost for enabling or safeguarding the space for such connections is likely to be significant and could have implications for the viability of development. The HBF also have concerns that given the availability of district heating networks that even if buildings are designed to allow for future connections they may never be utilised leading to unnecessary costs to the developer and purchaser.

### **Policy D7 Housing design**

This policy requires residential development to meet the NDSS, the HBF response to this is set out in response to Policy H5.

This policy requires all residential development to be accessible and adaptable in accordance with requirement M4(2) except where it can be clearly demonstrated that this is impracticable due to site specific factors. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, 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. It is incumbent on the Council to provide a local assessment evidencing the specific case for Salford which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy.

The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

This policy requires all residential developments to exceed the fabric energy efficiency required under Part L of the Building Regulations by at least 19%, the HBF response to this is set out in response to Policy CC1 and EG1.

### **Future Engagement**

I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry. The HBF would like to be kept informed of the progress of the document. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Joanne Harding', with a stylized, flowing script.

**Joanne Harding**

**Local Plans Manager – North**

Email: [joanne.harding@hbf.co.uk](mailto:joanne.harding@hbf.co.uk)

Phone: 07972 774 229