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03/04/2020

Dear Sir / Madam,

## **MANCHESTER LOCAL PLAN ISSUES CONSULTATION**

Thank you for consulting with the Home Builders Federation on the Manchester Local Plan Issues consultation.

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.

### **Plan Period**

The Local Plan will cover a period up to 2038 and will be reviewed every five years. Assuming that the Plan can be adopted within the next three years, as set out in paragraph 9.2, this will be appropriate and will allow for the 15-year period (minimum) for strategic policies required by the National Planning Policy Framework (NPPF).

### **Relationship with the GMSF**

The Local Plan is being developed within the overarching context of the Greater Manchester Spatial Framework (GMSF), which would provide a broad strategic context for the Local Plans of Manchester and the other nine Greater Manchester districts once it has been examined and adopted. This would include key development principles for Manchester, including the scale of commercial and residential growth and the strategic role of certain locations, such as the city centre and Manchester Airport. For Manchester the draft GMSF proposes 54,530 new homes, approximately 27% of the GM total.

### **Vision and Objectives**

The Objectives include providing for a significant increase in high quality housing provision, affordable to all income groups, in attractive, safe and cohesive neighbourhoods. The HBF support the Council in looking to provide a significant increase in housing provision but consider that the objectives should also seek to

ensure that sufficient homes are met to meet local needs and to balance with the economic growth.

## **Strategic Issues**

### To achieve a zero carbon Manchester by 2038

Paragraph 5.2 of the document sets out key areas for action to achieve zero-carbon by 2038, including looking to ensure new buildings will generate zero emissions when occupied and have significantly less emission embodied in their materials and construction phase.

It is noted that this policy is setting a target ahead of the Government target of net Zero Carbon by 2050. The HBF does not generally object to encouragement for the need to minimise the carbon emissions, the HBF support moving towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements which is universally understood and technically implementable. The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Council from stipulating energy performance standards that exceed the Building Regulations but consider that the Council should comply with the spirit of the Government's intention of setting standards for energy efficiency through the Building Regulations. It is the HBF's opinion that the Council should not be setting different targets or policies outside of Building Regulations. The key to success is standardisation and avoidance of every Council in the country specifying its own approach, which would undermine economies of scale for both product manufacturers, suppliers and developers.

The Government has consulted (ended on 7th February 2020) on The Future Homes Standard. The UK has set in law a target to bring all its greenhouse gas emission to net zero by 2050. New and existing homes account for 20% of emissions. It is the Government's intention to future proof new homes with low carbon heating and world-leading levels of energy efficiency. This consultation addressed:

- options to uplift standards for Part L (Conservation of Fuel & Power) Building Regulations in 2020 and changes to Part F (Ventilation) Building Regulations. An increase in energy efficiency requirements for new homes in 2020 will be a meaningful and achievable stepping-stone to the Future Homes Standard in 2025. This is expected to be achieved through very high fabric standards and a low carbon heating system based on one of two options. The Governments preferred Option 2 proposes 31% reduction in carbon emissions compared to current standards (Approved Document L 2013) delivered by installation of carbon saving technology and better fabric standards. Both options increase costs for housebuilders (estimated costs between circa £2,557 - £4,847 per dwelling);
- transitional arrangements to encourage quicker implementation; and
- clarifying the role of Local Planning Authorities (LPA) in setting energy efficiency standards. The Government is proposing to remove the ability of LPAs to set higher energy efficiency standards than those in Building Regulations which has led to disparate standards across the country and inefficiencies in supply chains.

The Government wants to create certainty and consistency. The Council should not be getting ahead of national policy, which is expected to come into effect mid / late

2020. The HBF considers that the Council does not need to include a policy in relation to zero-carbon in housing provision, as this will be provided by national standards.

To balance the competing demands for space

Para 5.10 sets out that the Council expects to continue to see strong growth both in terms of people and the economy. The next paragraph sets out where the Council expects housing development to be provided, notably within the conurbation core on brownfield sites, on the northern and eastern edges of the city and in the emerging neighbourhoods on the southern fringes. It does, however, highlight issues in relation to the delivery of these areas in terms of infrastructure deficits.

The HBF would support the Council in meeting the housing needs created by the strong growth in both population and the economy. The HBF considers that the development provided should be at an appropriate scale and quantity, as well as providing an appropriate range, variety and choice to meet the needs and aspirations of local people.

Para 6.15 states that since April 2015 around 3,000 affordable homes have been delivered or are committed to be delivered by March 2021. It goes on to state that if the Council are to deliver the 6,400 affordable homes in the Residential Growth Strategy then a further 3,400 affordable homes will need to be delivered by March 2025. The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. An increase in the total housing figures may be considered where it could help deliver affordable housing (ID: 2a-024).

The Draft GMSF (Jan 2019) sets out that Manchester (and Salford) will continue to be an appropriate location for the highest levels of new housing due to their central location, good public transport connections, proximity to the main concentrations of employment, leisure opportunities, and the ability to deliver high density developments. Table 7.1 in the Draft GMSF sets out the distribution of Greater Manchester's new dwellings 2018 to 2037.

The HBF considers that the Council should ensure that all households have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council's focus should be ensuring that appropriate sites are allocated to meet the needs of specifically identified groups. The Local Plan should ensure that suitable sites are available for a wide range of types of development across a wide choice of appropriate locations. NPPF (para 61) is clear that the Council need to assess and reflect in their planning policies the size, type and tenure of housing needed for different groups in the community.

The HBF considers that a diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery can be maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and

creates opportunities to diversify the construction sector.

To create neighbourhoods that promote and enable healthy lifestyles

The HBF generally supports plans that set out how the Council will achieve improvements in health and well-being. In preparing its local plan the Council should normally consider the health impacts with regard to the level and location of development. Collectively the policies in the plan should ensure health benefits, and limit any negative impacts and as such any development that is in accordance with that plan should already be contributing positively to the overall healthy objectives of that area.

**Places to live**

The HBF generally considers that the Council should be seeking to address any specific housing needs that are identified by their evidence base. If the Council intends to introduce any of the optional housing standards the Council will need to ensure that it has an appropriate evidence base in line with the requirements of the PPG. For example, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. The 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 Manchester which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy.

The HBF does not dispute that there is likely to be a need for affordable housing within Manchester and indeed supports the need to address the affordable housing requirements of the city. However, in preparing a policy to address this affordable housing need, the Council will need to consider the viability of the affordable housing requirements, alongside other policy requirements to ensure that homes are viable and deliverable, in line with paragraph 34 of the NPPF.

**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,



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