

Strategic Planning & Growth Team
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SENT BY EMAIL
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17/03/2021

Dear Sir / Madam,

TRAFFORD LOCAL PLAN: REG 18 CONSULTATION

1. Thank you for consulting with the Home Builders Federation (HBF) on the Trafford Local Plan Regulation 18 consultation.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes 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 upon selected policies within the Regulation 18 consultation document. These responses are provided to assist the Council in the preparation of the emerging local plan. The HBF is keen to ensure that Trafford Council produces a sound plan which provides appropriate policies for the area.

IP1 – Inclusive Economy

4. This policy appears to bring together and repeat a lot of information that is contained within other policies, with each element that it expects residential led proposals to deliver set out in more detail in other policies. The HBF considers therefore, that this policy could be deleted.

IP3 – Health and well-being

5. This policy looks for major developments to provide a health impact assessment (HIA). 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.
6. The PPG sets out that HIAs are 'a useful tool to use where there are expected to be significant impacts' (ID:53-005-20190722) but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to



these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Consequently, where a development is in line with policies in the local plan a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring a HIA. In addition, the HBF considers that any requirement for a HIA should be based on a proportionate level of detail in relation to the scale and type of development proposed. The requirement for HIA without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.

IP4 – Education and skills

7. This policy expects major developments to demonstrate how they will implement opportunities for the employment and up-skilling of local people; opportunities for apprenticeships or work experience; and work with Trafford based companies.
8. Increasing the number of people working within the construction workforce, and the skills and diversity of this workforce, is a top priority for the HBF. The construction workforce is ageing, and is facing critical shortfalls in many trades, such as bricklaying and ground working. Our work in this area, managed by the HBF's Construction Skills Partnership, focuses on a number of areas, including ensuring that the skills levy that housebuilders pay to the Construction Industry Training Board is deployed effectively to increase the number of people entering the industry and the quality of the skills training they receive. A genuine strategic approach is needed to improve the training of people in the construction trades. This includes an evaluation of the future skills needs of employers, and an evaluation of the quality of the training that is available through colleges. Without this essential basic assessment, any skills initiative devised by the Council represents a waste of public and private resources. The HBF's Construction Skills Partnership would welcome the opportunity to discuss the construction skills needs of the area with the Council, this would likely be more beneficial than the currently proposed policy.

HO1 – Scale, phasing and distribution of new housing development

9. This policy states that a minimum of 18,546 net additional dwellings will be delivered in Trafford, or an average of around 1,091 per year. The Council propose to phase this requirement with 591 dwellings per annum (dpa) being provided in the period 2020 to 2025, 1,091dpa in the period 2025 to 2030 and 1,448dpa in the period 2030 to 2037.
10. This housing requirement is based on the proposed policies contained within the emerging Greater Manchester Spatial Framework (GMSF). However, the publication and consultation on the GMSF has been delayed due to the decision of Stockport Council last year to withdraw from the GMSF. The GM Strategic Housing Market Assessment (Update August 2020) (SHMA) identifies an overall annual housing need for GM of 10,534dpa, this is based on the combined total of the Local Housing Needs (LHNs) of the ten individual authorities based on the standard methodology. It identifies the LHN for Trafford as 1,369dpa. However, this document was prepared prior to the Government's amendments to the LHN standard methodology which would now include

an additional 35% uplift for Manchester and prior to the withdrawal of Stockport Council. The SHMA does not set out any recommendations for how this overall LHN should be distributed across the individual authorities. The emerging GMSF (Draft Oct 2020) (Policy GM-H 1) seeks to deliver 10,534dpa to meet the LHN figure for the whole of Greater Manchester (GM), redistributing the figures between the ten GM local authorities in accordance with the GMSF Spatial Strategy. It suggests that higher levels of housing growth will be focused in the central and northern districts. This policy (Table 7.2) gives a figure of 1,091dpa for Trafford. Table 7.1 of this document also sets out the housing land supply 2020-2037 it suggests that there is a supply for 21,289 homes in Trafford. However, this will now need to be amended to a figure for nine GM authorities following the decision of Stockport to withdraw from the Plan.

11. The PPG¹ allows for LHN assessments to cover more than one area, in particular where strategic policies are being produced jointly, or where spatial development strategies are prepared by elected Mayors, or combined authorities with strategic policy making powers. In these cases, the PPG states that the housing need for the defined area should be at least the sum of the LHN for each authority in the area. It states that it will be for the relevant strategic policy making authority to distribute the total housing requirement across the plan area. It goes on to state that where a spatial development strategy has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should seek to re-visit their local housing need figure. The HBF notes that at present the GMSF has not been published, is still emerging and is still subject to quite significant levels of objection.
12. The HBF has considered the LHN using the Standard Methodology set out in PPG, it can be calculated as follows:

Step 1 - Setting the baseline:

2014-based household projections in England average annual household growth over a 10-year period, with the current year being used as the starting point. The household projection for 2021 was 104,524 and in 2031 it is 114,664, therefore the growth equals 10,140, giving an average of 1,014 households each year.

Step 2 - An adjustment to take account of affordability:

The most recent median workplace-based affordability ratio for Trafford (2019) is 9.58.

Where an adjustment is to be made, the formula is:

$$Adjustment\ factor = \left(\frac{Local\ affordability\ ratio - 4}{4} \right) \times 0.25 + 1$$

$$Adjustment\ factor = (((9.58-4)/4) \times 0.25) + 1 = 1.34875$$

Minimum annual local housing need figure = (adjustment factor) x projected household growth.

¹ PPG ID: 2a-013-20201216

For Trafford this would be: Minimum annual local housing need figure = $(1.34875) \times 1,014 = 1,368^2$.

Step 3 - Capping the level of any increase

The Trafford Core Strategy was adopted in 2012, and is more than five years old, therefore the local housing need figure is capped at 40% above whichever is the higher of: the projected household growth for the area over the 10-year period identified in step 1; or the average annual housing requirement figure set out in the most recently adopted strategic policies.

The projected household growth for the area over the 10-year period was 1,014 dwellings per annum (dpa), 40% above that would be 1,420dpa. The Trafford Core Strategy has a housing requirement of 760dpa (2021/22-2025/26), 40% above the 760 would be 1,064dpa. The higher figure is therefore taken from the projected household growth at 1,420dpa.

The minimum annual LHN is therefore below this cap, and therefore does not limit the increase to the local authority's minimum annual housing need figure.

Therefore, the minimum LHN for Trafford as calculated by the standard method is **1,368 dwellings each year**.

13. It should be noted that the standard method identifies the minimum LHN and there may be circumstances when it is appropriate to plan for a higher housing need figure than the standard method identifies. These circumstances include where there are growth strategies, strategic infrastructure improvements, an unmet need from neighbouring authorities or where previous levels of housing delivery in the area or previous assessments of need are significantly greater than the outcome of the standard method.
14. Part HO1.9 of the policy states that the Council will support the provision of new housing that makes as much use as possible of previously developed land, within the existing urban area. Part HO1.12 states that the development of greenfield land will only be considered favourable where it can be demonstrated that the proposed development will be capable of creating sustainable communities; will contribute significantly to the Development Plan's overall objectives; and will not compromise the Council's achievement of its brownfield land priority over the plan period, and that without its release, the Council's 5-year housing land supply could not be delivered.
15. The HBF supports the Council in making as much use as possible of previously developed land (PDL) in accordance with 2019 NPPF. However, the HBF considers that it is important to ensure that the prioritisation of PDL does not compromise the delivery of homes in sustainable locations to meet local needs. The HBF also considers it will be important to consider the future deliverability of intensely developed residential schemes, which will be dependent on the viability of PDL and demand for high density urban living post Covid-19.

² 1,367.6325

HO2 – Land release for new residential development

16. The HBF considers that the sites to be allocated should be identified within the plan policy rather than an appendix. The HBF also considers that the policy should include an indication of the size and capacity of the sites identified.
17. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.
18. The Plan should ensure the availability of a sufficient supply of deliverable and developable land to deliver Trafford's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (5YHLS), and achieve Housing Delivery Test (HDT) performance measurements. The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.
19. The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. 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 is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market.

HN1 – Dwelling size, type and tenure

20. This policy requires development proposals of 10 or more dwelling or 0.5ha to deliver a range and mix of dwelling sizes, types and tenures. It goes on to look for 50% of homes to be provided with 1 or 2 bedrooms and 50% to be 3 or more bedrooms. It also requires developments to be accompanied by a statement setting out how the scheme contributes to the housing mix, be adaptable, contribute to the split of small and large accommodation, increase the provision of family homes and increase the provision of specialist accommodation.

21. 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 of the site or the need to provide significant amounts of additional evidence. The HBF have concerns that the collection of evidence required by this policy will be very time-consuming and may require the need to employ different specialists.
22. 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. The HBF also recommends that the evidence required to support the housing mix is proportionate to the development and is not overly onerous.

HN2 – Affordable housing

23. This policy expects all major developments to provide 40% affordable homes, the policy sets the tenure split as 60% intermediate homes and 40% rented. The Trafford Housing Needs Assessment (2019) (HNA) identifies an affordable housing need of 545dpa. The HBF supports the need to address the affordable housing requirements of the borough. The NPPF³ is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. There does not appear to be a viability report available with this document and therefore at this point it is not possible for the HBF to comment on the viability of this policy or others within the document. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery.

HN5 – Other housing needs

24. This policy looks for all developments of 100 or more homes to provide serviced plots for self and custom builders. 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 is, 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 Council's approach is restrictive rather than permissive by requiring the inclusion of such housing on sites of 100 dwellings or more. This policy approach 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. Meaning that as currently proposed this policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes. The HBF would recommend appropriate evidence is collated to ensure that house building delivery from this source provides an additional contribution to boosting housing supply. This is likely to include engaging with landowners and working with custom build developers to maximise opportunities.

³ NPPF Paragraph 34

25. The HBF does not consider that the Council has appropriate evidence to support the requirement for a proportion of the total plots on developments of more than 100 dwellings to provide service plots for custom or self-build housing. PPG⁴ sets out how custom and self-build housing needs can be assessed. The HNA provides a very limited review of the Trafford Self-Build and Custom Build Register, just setting out that there were 88 applicants. This has been updated to 141 applicants in the Local Plan itself. The HBF are concerned that this is not a proper review of the data and does not necessarily identify double counting or whether any of these needs have already been met within Trafford or elsewhere or whether these people would actually consider sites located within a larger residential scheme.

HN6 – Adaptable and Accessible Housing

26. This policy requires all new dwellings to be built to M4(2) standards. It also requires developments of 50 or more dwellings to provide at least 2% of homes at M4(3) standards. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG.
27. PPG⁵ 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 Trafford 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 recommends that an appropriate transition period is included within the policy.
28. 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, this is not just in relation to the ability to provide step-free access.

CC2 – Low Carbon and Renewable Energy

29. This policy states that there is an expectation that all new development will be zero net carbon from 2028.
30. 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 supports 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

⁴ PPG ID: 67-003-20190722

⁵ PPG ID: 56-007-20150327

standards that exceed the Building Regulations. However, the HBF considers that the key to success is standardisation and avoidance of every Council in the country specifying its own approach to energy efficiency, which would undermine economies of scale for both product manufacturers, suppliers and developers.

31. 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. The Government wants to create certainty and consistency. An uplift to Part L standards will improve the energy efficiency of new homes and prepare housebuilders and supply chains in readiness for the further uplift in 2025 to meet the Future Homes Standard.

ST6 – Car parking standards

32. This policy states that all development will be expected to make provision for Electric Vehicle Charging Points appropriate to the scale and type of development. The Council will be aware that the Government has consulted on Electric Vehicle Charging in Residential and Non-Residential Buildings⁶. This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in 2021. The inclusion of Electric Vehicle Charging Point (EVCP) requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCP in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7 kW obsolete for future car models, 7 kW is considered a sufficiently future-proofed standard for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un-tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M. The Government has estimated installation of such charging points add on an additional cost of approximately £976. The HBF therefore considers that this policy is unnecessary for residential developments.

Future Engagement

33. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
34. The HBF would like to be kept informed of the progress of the Plan and associated documents. Please use the contact details provided below for future correspondence.

⁶ <https://www.gov.uk/government/consultations/electric-vehicle-chargepoints-in-residential-and-non-residential-buildings>

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Joanne Harding', written in a cursive style.

Joanne Harding

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