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30 September 2021

Dear Mayor of Greater Manchester and Deputy Mayor for Housing

PLACES FOR EVERYONE: JOINT DEVELOPMENT PLAN DOCUMENT – PUBLICATION STAGE

Thank you for consulting with the Home Builders Federation (HBF) on the Places for Everyone Joint Development Plan Document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan – Publication Stage 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.

It is noted that the Place for Everyone Plan (PEP) only covers nine of the ten Greater Manchester local authority areas. The HBF supports the decision of these local authorities to continue working together to produce a joint plan for the area. This is particularly important given the dated nature of many of the local plans covering this area. The delays in preparing a joint plan and the associated lag in bringing forward local plans for the area has resulted in five of the nine authorities having not meeting the housing delivery test.

Plan Period

The Plan is unsound because it is ineffective.

The time period over which the Places for Everyone Plan will run is unclear. We note that Policy JP H1 states that the housing requirement is to be delivered over the period 2021-2037. It would be helpful if this was stated on the front cover of the Plan.

It follows from this that the performance of the local authorities should be based on this time period. Consequently, the nine participating local authorities will be required to deliver the



new housing requirements stipulated by the PEP from this current year – 2021-22. It would be helpful if the Plan clarified this.

Relationship with District Local Plans

The Plan is unsound because it is ineffective.

This section clarifies how the Joint Development Plan Document will relate to district local plans. This is helpful but this section needs to be amended to make clear that district local plans should not seek to revise the housing targets set by the Places for Everyone Plan 2021 (PfE 2021). The housing target overall for the nine local authorities of Greater Manchester, and how this is apportioned among the nine, is a matter for the PEP.

This section should also clarify that each local authority is responsible for managing and delivering its apportionment of the overall housing requirement as set out in Table 7.2 of the PEP. We assume that this is the approach favoured by the nine local authorities, rather than delivery being managed in aggregate across the nine participating local authorities.

The Plan should include measures to rectify poor housing delivery in a local authority area. This should include a review of PfE policies, with scope to remove these, if they are judged to be a hindrance to delivery. This will include scope to allow local authorities to suspend the 'brownfield preference' policy if this is necessary to improve delivery.

Duty to cooperate

The NPPF¹ requires that plans are effective. This includes that they are based on effective joint working on cross-boundary strategic matters. This should be evidenced by statements of common ground.

Stockport Council is a constituent local authority member of the Greater Manchester Combined Authority. It had previously participated in the preparation of the Greater Manchester Spatial Framework – the precursor joint plan, before its withdrawal in December 2020. The PfE 2021 should clarify the relationship of this Joint Plan to Stockport's local plan, and whether there is an expectation on the part of the Metro Mayor that Stockport will accommodate its housing requirement within its own administrative area. Stockport remains a member of the Combined Authority and it has a very strong economic, housing market and transport relationships to the wider Greater Manchester area. The Metro Mayor wields substantial powers – planning and economic. He should use these to persuade the constituent members to engage positively and constructively with planning to ensure that the wider objectives of the wider Greater Manchester area are secured. Stockport Council must not be allowed to 'cherry-pick' parts of the devolution agenda.

To demonstrate legal compliance with the duty to cooperate, the Mayor and the Combined Authority should apply pressure on Stockport Council to ensure that it puts in place measures to meet its housing needs in full to the same timeframe of the PfE 2021 Plan.

¹ NPPF (2021) Paragraphs 24-27

Policy JP-S 1: Sustainable Development

The policy is unsound because it is ineffective and contrary to national policy.

This policy requires development to maximise its economic, social and environment benefits simultaneously, while minimising its adverse impacts, utilising sustainable construction techniques and actively seeking opportunities to secure net gains across each of the objectives. It also states that preference will be given to using previously developed land and vacant buildings to meet development needs.

The HBF supports the Mayor in endeavouring to make as much use as possible of previously developed land (PDL) in accordance with the 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 and the Grenfell tragedy.

The Mayor will wish to prioritise improving Greater Manchester’s productivity and economic competitiveness over the next ten years. As the PfE 2021 observes at paragraph 1.29:

“In extremely challenging times, the need for bold ambitious plans for good quality employment are critical. We are striving to define our new ‘normal’ however we know that we need to continue to invest in our city and town centres to drive our recovery. We need to continue to develop our Research and Development capabilities underpinned by our excellent academic institutions as well as investing in strengthening existing, and creating new, employment locations so that we are all able to contribute to, and benefit from, growth as part of a thriving Northern Powerhouse.”

Integral to this will be constructing the type of homes that will attract new workers to the city-region. The construction of flats in regeneration zones will have an important role to play in the future but demand for this type of product will be more muted in the next few years. The Combined Authority will need to ensure that a mix of housing types in a variety of locations are constructed in the next ten years to attract and retain workers. We also note the aim to maintain ‘southern competitiveness’ (see for example paragraph 4.61). This will require ensuring that the housing supply matches better the aspirations of workers. This will be necessary to reduce the number of workers lost to Cheshire and Warrington. This is an existing problem that needs to be reversed. See Map 2.2 of the SHMA.

A policy that gives preference to brownfield land is contrary to national policy. National planning policy does not include a preference for brownfield land for housing as the Plan observes at paragraph 1.43. National policy does, however, require a variety of sites to be allocated in areas where housing is needed. As paragraph 60 states:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of

groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

The Mayor should consider removing this ‘brownfield preference’ policy as it will militate against housing supply, and the delivery of other Mayoral policy objectives, such as affordable housing and support for the economy. Not all sites are viable without public subsidy in low value areas. As paragraph 4.11 of the Places for Everyone 2021 Delivery Topic Paper notes:

“The underlying message of the viability testing is that most development types can meet the policy requirements of the draft P4E in the medium to high value areas (VA1-3). However, in low value areas of Greater Manchester, there is a need for public sector intervention to achieve viable scheme delivery and to meet the requirements of the draft PfE.”

Uncertainty with viability in combination with a brownfield preference policy could militate against delivery in local authorities like Bolton, Bury, Oldham and Tameside – all four of whom are already required to apply the presumption in favour of development or prepare an action plan to improve delivery (see paragraph 4.7 of the Delivery Topic Paper).

Paragraph 4.18 of the Delivery Topic Paper goes on to observe:

As noted in paragraph 4.10, the Stage 1 Viability Assessment has identified that 69% of housing sites within the 2020 existing are viable based on existing housing condition, housing mix and density.

It then goes on to explain that a 35% buffer to the land supply is necessary for the plan period up to 2025. As the Delivery Topic Paper document explains at paragraphs 4.19 and 4.20:

“4.19 This is why the first targets at the start of the plan period have been set at levels which ensure at least a 35% buffer against the land supply for this period. This is to ensure that the individual Local Planning Authorities have sufficient land to meet the flexibility requirements of NPPF in terms of demonstrating a five-year supply and to account for unknown impacts from Covid and economic cycles.

4.20 In practice this means that we have assumed a 35% buffer is needed in the period up to 2025. Beyond this point there is an assumption that values will rise, enabling new markets to be created supported by funding such as Levelling Up Funding, Town Deals and transport investments, with targets stepping up for 2025-2030 and 2030-37”.

These measures are sensible but are at odds with an argument for a ‘brownfield preference’ policy. A brownfield preference may be justifiable in strong housing market areas where viability is a lesser issue, but not across Greater Manchester. Viability will often be challenging in Greater Manchester, and it is necessary to acknowledge the need to give greater priority to other policy objectives like improving affordable housing supply which has been de-prioritised in the last two decades. These other public policy objectives will add to the challenge of achieving viability.

Paragraph 4.10 of the Delivery Topic Paper observes that the viability assessment shows that only 69% of the housing land supply is viable but even this calculation is made on the basis that no affordable housing will be provided.

Housing land supply.

We have noted Table 0.1 included in the Housing Topic Paper (July 2021). This shows the land supply for the nine local authorities. It shows that there are no housing land supply reserves – or what the Plan calls ‘allowances for losses’ – in five local authorities out of the nine. If the brownfield sites favoured by the Mayor fail to come forward in-time, then allowing greenfield sites will be unavoidable in these local authorities if the Mayor wishes to maintain housing supply.

Moreover, we note the following statement in the local authorities / Mayor’s commentary on the housing land supply. This is contained in the ‘importance notice – disclaimer’ section of the Housing Topic Paper. To support the Housing Land Supply Statement (HLSS) the local authorities / Mayor state:

“some of the sites identified in the PfE HLSS are currently being used for employment purposes and any planning application to change the use of these sites to residential would be assessed against planning policy that seeks to protect employment land and other material planning considerations”

Based on this statement, it is apparent, therefore, that some of the brownfield land that the Mayor is relying upon to avoid the need greenfield release, could remain in employment use. This is not untypical in metropolitan areas, and we appreciate the uncertainty involved in assessing the extent to which previously developed land will be recycled, but it does reinforce our basic point: that where housing land supply is uncertain, and there are no reserve sites, a ‘brownfield first’ policy is untenable.

Conclusion

For these reasons we have given, a ‘brownfield preference’ policy is unjustified. Its retention in the Plan will militate against housing delivery.

Policy JP-S 2: Carbon and Energy

The policy is unsound because it is ineffective.

This policy aims to deliver a carbon neutral Greater Manchester no later than 2038, it sets out several measures that will be used, including all new development to be net zero carbon by 2028 (see also para. 1.52).

Government policy, at present, is for homes to be ‘zero carbon ready’ by 2025. This is supported by the HBF and its wider engagement with the housebuilding industry. This work has culminated in the publication of a Future Homes Delivery Plan. This plan includes headline goals to deliver:

- high quality homes that are zero carbon ready and sustainable by 2025, with early investigation of the steps beyond;
- places and developments that are consistently low carbon, nature rich, resilient healthy, well-designed and beautiful by 2025;
- production and construction methods that are net zero and sustainable by 2050, with substantial progress by 2025 and 2030;
- businesses operations in line with the Race to Zero: net zero by 2050 with a 50% reduction by 2030.

This programme of work has wide support of the industry, water and energy providers as well as the RTPI, the RSPB and three Government departments. The involvement of the supply-chain is critical in determining a feasible timetable for the transition to zero carbon homes.

However, the industry is unable to commit to guaranteeing that all new homes will be net zero carbon from 2028. The Government will establish new targets for the industry in 2025. While it may be feasible to build to net zero carbon by 2028, this cannot be guaranteed now.

This policy requirement, consequently, is unsound because it is unjustified. It is unjustified to push for a more stringent target than the programme set by Government that is the product of a careful discussion between Government, the housebuilding industry and the supply chain. It is also unviable. Paragraph 4.6.7 of the Viability Assessment makes an allowance for future regulatory changes associated with the Future Homes Standard. The viability assessment, however, demonstrates that housing delivery will struggle across Greater Manchester and that only 69% of the future housing land supply is viable. As paragraph 5.23 of the Delivery Topic Paper observes:

“5.23 Study conclusion - The underlying message of the viability testing is that most development types can meet the policy requirements of the draft PfE in the medium to high value areas (VA1-3). However, in low value areas of Greater Manchester, there is a need for public sector intervention to achieve viable scheme delivery and to meet the requirements of the draft PfE.”

However, even this percentage relies on there being no affordable housing. It is contrary to national policy (e.g., paragraph 34 of the NPPF) to adopt policies that will impair the delivery of the plan. This is not to argue that affordable housing delivery should be deprioritised. On the contrary, to secure greater numbers of affordable homes, the Mayor should reduce his expectations in terms of other policy goals.

While the work of the industry to become net zero is important, affordable housing delivery and other measure like improving public transport provision should be higher policy priorities for the Mayor. The merits of accelerating energy efficiency beyond the Government’s timetable and what the housebuilding industry and its supply chain has judged to be feasible is questionable. Improving public transport provision and connectivity would be far more beneficial for the public and for the environment.

Policy JP-S 3: Heat and Energy Networks

The policy is unsound because it is unjustified and ineffective.

This policy states that within the identified ‘Heat and Energy Network Opportunity Areas’ residential developments of 10 dwellings or more should evaluate the viability of connecting to an existing or planned network or installing a site-wide or communal network solution.

First, policies need to have some prospect that they can be implemented. Paragraphs 16 and 34 of the NPPF requires policies to be clear and they should not undermine the delivery of the plan. Consequently, rather than the applicant having to demonstrate whether compliance with a policy is feasible, the Mayor, through preparing the Plan, should be confident that residential developments involving 10-or-more homes can, in most instances, connect to a communal heating network. If this network does not exist or is patchy, then this requirement is unsound. We have considered the Carbon and Energy Topic Paper, and Figure 3: the Low Carbon Opportunity Zones, GM Spatial Energy Plan (2016). This shows a very sparse network of heat networks. Applicants, consequently, could have to undertake an evaluation to demonstrate what the evidence base already shows. This would represent a waste of time and resources.

Second, the nine authorities should consider the Department for Business, Energy and Industrial Strategy consultation on Heat Networks: Building A Market Framework (ended on 1 June 2020). To meet the Government’s legal commitment on reducing greenhouse gas emissions virtually all heat in buildings will require decarbonising. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government’s climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The authorities should also be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies. This will add a further limitation on the ability of applicants to adhere to this policy.

Third, the Mayor should consider the position of residents. Some heat network consumers have poor levels of satisfaction compared to consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. Research by the Competition and Markets Authority (CMA) found that a significant proportion of suppliers and managing agents do not provide pre-transaction documents, or what is provided contains limited information, particularly on the on-going costs of heat networks and poor transparency regarding heating bills, including their calculation, limits consumers’ ability to challenge their heat suppliers reinforcing a perception that prices are unjustified. The

monopolistic nature of heat networks means that future price regulation is required to protect domestic consumers. The CMA have concluded that “a statutory framework should be set up that underpins the regulation of all heat networks.” They recommended that “the regulatory framework should be designed to ensure that all heat network customers are adequately protected. At a minimum, they should be given a comparable level of protection to gas and electricity in the regulated energy sector.” The Government’s latest consultation on heating networks proposes a regulatory framework that would give Ofgem oversight and enforcement powers across quality of service, provision of information and pricing arrangements for all domestic heat network consumers.

Policy JP-S 4: Resilience

This policy looks for development to provide adaptable buildings and places that can easily respond to changing needs, future climate impacts and new technologies, it also looks for development to design out crime, anti-social behaviour and terrorism. It goes on to look for developments to provide a reduction and respite from more extreme temperatures and winds associated with climate change, and to contribute to the delivery of at least 50,000 additional affordable homes up to 2037.

It is unclear why the 50,000 affordable homes target has been singled-out as a key measure of the resilience of the Greater Manchester and not also the delivery of the overall housing requirement. We recognise the need to increase the supply of affordable homes, but the supply of housing to meet general housing needs is also essential. Equally, the supply of older persons housing should be a key measure.

We recommend that this section of the GMSF – because we do not think it needs to be articulated in a policy – is amended to refer to delivery of the 165,000-housing target and the need to increase the supply of older persons housing as key measures too.

Policy JP-S 5: Flood Risk and the Water Environment

The policy is unsound because it is unjustified.

This policy expects developments to manage surface water run-off through sustainable drainage systems so as not to exceed greenfield run-off rates.

The NPPF² already looks for major developments to incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The HBF agrees that wherever practicable, it is important to incorporate SuDS within planned major development schemes in line with the NPPF. SuDS can improve the quality of life in a development by making them more visually attractive, sustainable and more resilient to change, by improving urban air quality, regulating building temperatures, reducing noise and delivering recreation and educational opportunities. However, the Mayor will need to adopt a more flexible approach in relation to how SuDs are provided as devising an appropriate layout is going to require a very careful balancing exercise of many competing factors, particularly in relation to other planning policy requirements, the efficient use of land and the individual site circumstances.

² Paragraph 169

Policy JP-G 7: Trees and Woodland

The policy is unsound because it is unjustified.

This policy states that where development would result in the loss of existing trees it will require the replacement based on two new trees for each tree lost, with a preference for on-site provision. It also aims to plant a tree for every resident in the plan area over the next 25 years as part of the City of Trees initiative.

This policy is unclear in terms of what applicants are expected to do. It is unclear if every part of this policy applies to applicants seeking planning permission. For example, would an applicant be required to plant a tree for every resident in a new scheme, or the net increase in residents?

In the way it is currently worded, the policy would not conform with para. 16 of the NPPF. The policy reads more like a general statement of intent. The Mayor should whittle the policy down to those elements that it is feasible for developers to provide, either through design, through master-planning on the strategic allocations (such as item 5), or through S106 obligations.

Policy JP-H 1: Scale, Distribution and Phasing of New Housing Development

The Plan is unsound because the housing requirement is unjustified. It will fail to support the Mayor's economic ambitions for Greater Manchester or provide the affordable housing required.

This policy states that a minimum of 164,880 net additional dwellings be delivered over the period 2021-2037, or an annual average of around 10,305. Table 7.1 of the Plan defines the land supply, whilst Table 7.2 sets out the distribution and phasing of new dwellings. The policy goes on to state that each local authority will monitor delivery rates within their area and will act as necessary to ensure that delivery rates are maintained as anticipated in this plan. It also states that any shortfall or surplus will be distributed over the remainder of the full plan period when calculating the five-year supply.

The annual average of around 10,305 dwellings appears to be in line with the minimum number of homes informed by the local housing need (LHN). However, the Government is clear this is a minimum figure and the PPG³ sets out the circumstances when it might be appropriate to plan for a higher housing need figure than the standard method indicates. 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. The PPG also makes clear that the government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth.

³ ID: ID: 2a-010-20201216

The HBF considers that there are clearly circumstances that identify that this plan should be planning for a housing requirement greater than the LHN. This would take into account the Mayor’s economic ambitions and the need for affordable housing.

The economic benefits of a higher housing requirement

We note the following statement in the PfE Plan at paragraph 2.6:

“The baseline economic forecast foresees an increase of around 100,000 jobs by 2037 (of which approximately 90% is forecast to be within the PfE Plan area). Similar changes in the sectoral mix to the recent past are forecast, although a more ambitious accelerated growth scenario estimates an increase of just over 170,000 jobs across Greater Manchester.”

The Mayor aims to close Greater Manchester’s ‘productivity gap’ – about 10% lower than the national average. This is referred to in paragraphs 6.3 6.7 of the PfE Plan. Potentially, the Plan is providing fewer new homes than new jobs. A housing requirement of circa 165,000 homes between 2021 and 2037 coupled with a job increase of potentially 170,000 in the accelerated growth scenario seems mismatched, especially when rising levels of economic activity is linked to rising demand for home ownership. Planning for too few new homes will result in a poor choice of homes and this will discourage workers from settling or staying in Greater Manchester to live. Greater Manchester will be competing with the Cheshire local authorities, Warrington and St Helens to attract and retain working-age households – households essential to the future economic life of town centres.

The risk is that the shortage in the number of homes, coupled with the shortage of supply of appropriate homes (houses rather than flats, especially after the COVID-19 pandemic) in locations where people would prefer to live, will serve to inhibit the Mayor’s ambitions for economic growth within the city-region. It would provide a greater choice of homes to enable people to move out of poor housing. Poor housing contributes in a major way to health inequalities -an issue identified by the Marmot review.

Increasing the housing requirement to 200,000 would ensure that housing supply is able to keep pace with different levels of employment growth and provide a greater choice of housing types to cater for different needs. This would equate to Option 6 – Hybrid Growth – as explained in the *Integrated Assessment of the Greater Manchester Spatial Framework*

Increasing the overall requirement to enable the provision of more affordable housing

The affordability of housing in Greater Manchester is a pressing political issue. Some 72,000 households are on the local authority waiting lists in Greater Manchester, with 26,000 of these having a ‘reasonable preference’ (paragraph 7.23 of the PfE). Delivering the 50,000 affordable homes required will be unfeasible based on a requirement of 165,000 homes as the majority of these will be delivered using planning obligations (S106). To deliver 50,000 homes from an overall requirement of 165,000 homes would suggest the need for 33% affordable housing on every housing site. Clearly this is unfeasible given that the Mayor’s viability evidence indicates that affordable housing is possible at 20% only in value areas VA1-VA3, but not in value areas VA4 and VA5 (see Viability Assessment, paragraph 5.1.8).

A higher overall housing requirement would increase the prospect of delivering 50,000 affordable homes. Increasing the overall housing requirement would lower that proportional target, making it more achievable on a site-by-site basis. If the overall target was increased to 200,000 homes, and it was assumed that 20% affordable housing was viable – especially in the local authorities of Manchester City, Salford and Trafford which are responsible for delivering most of the housing requirement – 6,303 homes a year out of a requirement for 10,305 – 65% - then this would provide 40,000 affordable homes, helping the Mayor to get closer to achieving his target.

Housing capacity

Moving away from questions of need, land supply for housing Table 7.1 demonstrates that there is capacity for 198,709 homes between 2020 and 2027 – nearly 200,000 homes. Some of this supply is ‘allowances’ for windfall and small sites. This is a critical element of the housing land supply to maintain competitiveness in the land supply and help diversify the housing offer. Table 6.1 of the Housing Topic Paper shows an estimated capacity for 190,752 homes.

Mayor cannot rely on vacancies as a contingency as these are quite low across Greater Manchester. As the SHMA observes at paragraph 5.70:

“Just over 2.6% of dwellings across Greater Manchester were classed as empty in 2019, which is slightly lower than the level in England as a whole (2.7%).”

The Mayor should increase the housing requirement to 200,000 homes for the period 2021-2037. If the Mayor wishes to retain a 16% land supply contingency (see Table 6.3), then the Mayor will need to release other sites from the Green Belt. Local authority housing requirements should be increased in line with the indications of capacity provided in Table 7.1.

We note that the additional capacity available in Manchester, Salford and Trafford. These are higher value areas where an increased housing requirement could help to support the supply of additional affordable housing. If supply was increased in these three local authorities in line with the assessment of capacity, this could provide 116,297 homes. A 20% affordable housing requirement would provide 23,259 affordable homes – nearly half the overall target. In combination with efforts by the other six local authorities, and Stockport Council, the Mayor has a good chance of achieving the target.

Local authority	PfE allocation (Table 7.2)	Land supply (Table 7.1)
Manchester	56,528	59,576

Salford	26,528	36,023
Trafford	17,954	20,698
		116,297

Distribution of the requirement

The PPG⁴ allows for LHN assessments to cover more than one area, 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.

Table 1: Local Housing Need and Housing Distribution			
	Local Housing Need	Policy JP-H 1	Difference
Bolton	783	787	4
Bury	591	452	-139
Manchester	3,527	3,533	6
Oldham	677	680	3
Rochdale	503	616	113
Salford	1,324	1,658	334
Tameside	651	485	-166
Trafford	1,377	1,112	-265
Wigan	872	972	100
Places for Everyone	10,305	10,305	

The approach taken by the PfE Plan is in accordance with national policy. However, the HBF is concerned that the apportionment of the overall housing requirement does not reflect the reality of housing needs and development in the joint plan area and whether it will be feasible to direct a greater share of new housing development to the northern boroughs. The PfE Plan’s own evidence⁵ shows that hardly any households move from Bury, Stockport, Tameside or Trafford to Wigan, which appears to be a separate housing market in itself. The highest house prices and the least affordable places to live tend to be the four more southern boroughs of Manchester, Salford, Trafford and Stockport. While we appreciate the Mayor’s aim to support the revival of the less economically resilient boroughs to the north – promoting northern competitiveness - by directing more housing supply there, altering these housing market geographies is a gradual process. The priority in the early years of the PfE Plan will be to ensure an adequacy of new housing supply in all sub-market areas, including current popular markets, to attract and retain the workforce GM needs to boost productivity (maintaining ‘southern competitiveness’). It is the HBF’s concern that rather than households moving to other areas within the plan area, households will move to surrounding areas such as Cheshire and Warrington. This would add to unsustainable commuting patterns, congestion and increased emissions.

⁴ PPG ID: 2a-013-20201216

⁵ SHMA Update Table 2.1

The best way to rectify this would be to increase the housing requirement to 200,000 homes over the Plan period and increase supply in all the boroughs in line with the evidence of spare housing land capacity in Table 7.1.

Housing land supply

We note Table 0.1 in the Housing Topic Paper, July 2021 (page A-1) – see below. This shows that some local authorities could struggle to maintain housing supply if delivery falters on allocated sites or windfall expectations prove optimistic. Five boroughs – Bury, Salford, Thameside, Trafford and Wigan – have no reserves. Also, four of these have no identified reserves after 2037, and so have nothing to draw down to plug a delivery gap. Nor can these boroughs necessarily draw upon an over-supply elsewhere to compensate for an under-deliver (see these representations below on the question of managing the five-year housing land supply).

The local authorities with no reserves need to identify contingency sites, including, possibly, safeguarded land.

Those local authorities with identified capacity for the period beyond 2037 - Trafford and Wigan - should identify and allocate this land to provide supply during this Plan period.

Table 0.1 in the Housing Topic Paper is reproduced below:

The Housing Land Supply position as of 1 April 2020 is summarised in the tables below.

Table 0.1: Housing Supply Summary (2020-2037)

District	Remaining Units available on Sites Under Construction	Sites with Extant Planning Perm / PiP Not Started	Other district SHLAA sites	Small sites windfall allowance	Allowance for losses	Total 2020-2037	Post-2037 identified supply
Bolton	1,691	4,668	6,796	2,701	-680	15,176	0
Bury	461	801	2,580	261	0	4,103	0
Manchester	10,792	5,953	44,977	2,134	-1,329	62,527	7,684
Oldham	1,085	1,216	8,097	780	-223	10,955	308
Rochdale	1,579	2,198	5,003	207	-990	7,997	0
Salford	9,583	12,078	12,583	1,959	0	36,203	0
Tameside	845	1,630	3,872	576	0	6,923	160
Trafford	3,453	5,115	7,117	777	0	16,462	2,996
Wigan	4,080	5,189	7,971	756	0	17,996	1,914
PfE total	33,569	38,848	98,996	10,151	-3,222	178,342	13,062

Small sites delivery

The Plan is unsound in relation to small site supply. It is contrary to national planning policy.

National policy seeks to support SME builders through the allocation of small sites. Paragraph 69 of the NPPF requires 10% of the housing requirement to be provided on sites no larger than one hectare. For the PfE Plan this would require 16,500 homes out of the total requirement for 165,000 to be provided on small sites of one hectare or less.

It would appear that the Mayor has failed to make provision for small site delivery through the PfE Plan. Instead, the Plan assumes that the 'windfall' trend on small sites will continue as before. As paragraph 7.10 of the PfE comments:

A further source of housing land supply will be small sites, which are typically not identified comprehensively in brownfield registers and strategic housing land availability assessments. It has been assumed that the supply of new dwellings on small sites will continue at the same rate in each district as has been seen over the last five years.

This assumption is a quite different thing to the requirement in the NPPF for plan-makers to actively identify and allocate actual sites to support a greater number of homes on small sites. Table 0.1 reproduced above shows that, at best, 10,151 homes might be provided on small sites. However, this has two weaknesses. First, it falls short of the national policy requirement for 16,500 homes to be provide on small sites; second, it is a windfall assumption, rather than identified supply; and third; it is unclear if these sites are one hectare or less in size.

We acknowledge that this may be a challenging element of national policy, but it would be helpful if the Mayor would explore whether it would be feasible to identify sites of one hectare or less and allocate these in the PfE Plan. If this was considered unfeasible, the PfE should be amended in its policy to make it clear that the subordinate local plans produced by the participating local authorities will comply with national policy and ensure that 10% of their respective housing requirements does consist of small sites.

This change could be made to Policy JP-H 1, so the revised policy reads:

Table 7.1, defines the land supply, demonstrating that brownfield land will be the predominant source of land over the plan period.

Local authorities, in preparing their subordinate local plans, will be required to identify land to accommodate 10% of their housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved.

New suggested text underlined.

Windfall allowance

National policy requires any windfall allowance to be supported by compelling evidence. The windfall allowance represents a relatively small element of the overall supply – 4.2% - but it is

unclear from the evidence base whether this allowance is justified. To understand this one must consider the Housing Topic Paper at page A-18 onwards. This argues that windfall will continue in the form of small sites as before for the last five years.

The windfall supply is summarised by Table 6, reproduced below. This is a summary of the supply of housing on small sites for the last five years (the definition of small site varies among the nine local authorities, although the NPPF does define a small site as one of one hectare in size or less. The thresholds used are shown in Table 7).

Table 6: Past completions on small sites, 2015-2020

District	2015/2016		2016/2017		2017/18		2018/2019		2019/20		Total 2015-2020	
	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net
Bolton	283	-	208	-	237	-	221	155	191	-	1,140	-
Bury	20	20	32	15	39	31	31	29	39	34	161	129
Manchester	175	-	197	-	158	158	210	210	157	-	897	-
Oldham	25	25	35	35	86	86	109	109	71	71	326	326
Rochdale	4	-	8	-	46	-	16	-	21	21	95	-
Salford	214	193	218	209	237	219	341	314	162	142	1,172	1,077
Tameside	75	52	51	42	67	53	66	58	54	36	313	241
Trafford	34	23	47	42	62	57	152	141	68	61	363	324
Wigan	70	69	63	61	53	43	-	85	61	59	-	317
Plan Area Total	900		859		985							

It is apparent that there are no figures for 2018/19 or 2019/20. Furthermore, net figures are unavailable but scrutiny of Table 6 shows that the net figures are lower than the gross supply in all years. Only seven local authorities are able to provide net figures for each of the past five years.

Table 8 shows the average delivery on small sites based on a mix of gross and net supply:

Table 8: Small sites – annual past trend

District	Gross 2015-2020	Net 2015-2020	Annual windfalls past trend 2015-2020
Bolton	1,140	-	228
Bury	161	129	26
Manchester	897	-	179
Oldham	326	326	65
Rochdale	95	-	19
Salford	1,172	1,077	215
Tameside	313	241	48
Trafford	363	324	65
Wigan	-	317	63
GM	-	-	908

The use of a figure of 908 dwellings as the basis for the windfall allowance seems hard to justify because a) the threshold used for small sites does not reflect the national definition of one hectare; and b) the trend is a mix of gross and net supply.

Housing trajectory and phasing of delivery

Table 7.2 of the Plan shows the stepped nature of the housing requirement it shows an annual average requirement of 10,305 dwellings, with 8,732 dwellings each year in the period 2021-2025, 10,305 dwellings each year in period 2025-2030 and 11,204 dwellings each year in the period 2030-2037.

The stepped approach is contrary to the Government’s objective to boost the supply of housing land and to plan positively. The Plan should be ensuring the housing needs are met at a consistent rate throughout the plan period rather than deferring until later in the plan period. Housing need including unmet housing need in the joint authorities is arising now, it is not staggered. The meeting of housing need should not be deferred. This also means that the LHN identified from the standard method will not be met until 2025, this means that needs are not being met and that households could face increasing house prices, worsening affordability and increased difficulty finding an appropriate home. We are sure that this is not what the Mayor intends, given the high indices of deprivation in many parts of Greater Manchester, as discussed in paragraphs 2.31-2.32 of the PfE Plan, of which the poor affordability, supply and condition of housing is a factor.

Objective 1 of the Plan also sets out to improve housing supply and mix and paragraph 7.2 of the Plan documents the character of the housing crisis in Greater Manchester: the rise in rough sleeping, the broken housing market, 70,000 households on local authority waiting lists, and the lack of availability of appropriate housing. These are hardly factors that would be improved by backloading delivery until 2025.

The PfE also touches upon the socio-economic impact of Covid-19 pandemic on Greater Manchester (see paragraph 2.8). The scarcity and overcrowding of housing have been a factor that has exacerbated and extended the experience of the pandemic in the city-region. Housing charity Shelter has commented that overcrowded social housing in Greater Manchester has contributed to the public health crisis⁶.

The recent Marmot Review of Greater Manchester: *Building Back Fairer in Greater Manchester*, examined the inequalities in the city-region. Among its conclusions, the report found:

*“Before the pandemic housing costs in Greater Manchester had increased, as they had in England generally, pushing many families into poverty. Housing conditions in the private rental sector had deteriorated and overcrowding and the prevalence of overcrowding and homelessness were increasing (2) (35). The 2019 Greater Manchester Housing Strategy stated that the quality of housing stock needed improving: “in some of our less affluent communities, older properties often show their age, presenting substantial concerns in terms of their condition, with common issues of damp, cold and other health and safety hazards, including their accessibility for those with mobility challenges”.*⁷

⁶ Greater Manchester's next mayor must solve its housing emergency. Shelter: 4 May 2021

⁷ See Marmot Review of Greater Manchester: *Building Back Fairer in Greater Manchester* Executive summary, page 29.

The report also found that:

“Close to one in 20 people, 4.7 percent, live in overcrowded accommodation in Greater Manchester, meaning they have fewer bedrooms than they need (37), the highest proportions being in Manchester, Oldham and Rochdale and the lowest in Wigan, Stockport, Trafford and Bury (8). In the North West 11 percent of ethnic minority households were overcrowded compared with 1 percent of White British households (38).”

The SHMA addresses the issue of overcrowding in section 5.7. The study records that overcrowding has increased across all of Greater Manchester since 2001⁸. As paragraph 5.64 of the SHMA notes:

“5.64 Both Manchester and Salford saw a significant increase in overcrowding, with Manchester more closely resembling the situation in London. Salford scored comparatively much worse on the ‘rooms’ measure than on the ‘bedrooms’ measure. The remaining Greater Manchester districts in general saw quite modest increases in overcrowding over this period.”

It is apparent from reading paragraph 6.36 of the Housing Topic Paper that the Mayor is anxious in case the adoption of a flat trajectory would cancel-out the 35% buffer. We can appreciate this concern but surely the solution to this would be to increase the supply of deliverable land for housing to match the required amount and provide a buffer as a contingency against non-delivery, to ensure that the delivery of homes required is not delayed, rather than delay the supply of homes that the people of Greater Manchester need.

In summary, the Mayor should abandon his backloaded trajectory and adopt a flat one to ensure that housing needs begin to be addressed in full each year at the earliest opportunity and from the date the Plan is adopted. At the time of writing, the housing market is in good health. Market conditions would support a flat or even front-loaded housing trajectory. It would be sensible to take advantage of these positive market conditions rather than postpone delivery and exposing this to future economic uncertainty.

Managing the Five-Year Housing Land Supply

We note this statement towards the end of Policy JP-H 1:

“Each local authority will monitor delivery rates within their area and will take action as necessary to ensure that delivery rates are maintained as anticipated in this plan. If this regular monitoring reveals significant deviation from the phasing in this plan, the factors resulting in these changes will be determined and consideration will be given to what action would be appropriate, including development management action and review of the policies in this plan. Any shortfall or surplus will be distributed over the remainder of the full plan period when calculating five-year supply. This work would feed into the regular reviews of this plan, although individual authorities may wish to take specific local action outside the formal review process to ensure that they can maintain delivery rates.”

In line with the NPPF at paragraph 66 there is a need for a clear explanation in the Plan about how the delivery of the overall housing requirement and the five-year land supply will be managed among the nine local authorities. The statement above is ambiguous. We

⁸ See paragraph 5.62 of the Greater Manchester SHMA, 2020

assume it is saying that if there is a shortfall in one local authority, this will be rectified within that local authority area. The shortfall cannot be rectified by an oversupply in another local authority. For example, if Manchester City delivers more homes than it is required to provide in one year, this oversupply cannot count towards an under-delivery in, say, Bolton. Each local authority will be responsible for managing the delivery of its own housing target.

Policy JP-H 1 should be amended to make this clear. This will be helpful for using the Housing Delivery Test.

Mix of dwelling types

The mix of dwelling types - apartments and houses - is unsound because it is unjustified.

The NPPF⁹ states that ‘*planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability*’. It¹⁰ also states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including but limited to those who require affordable housing, families with children). The current land supply is mainly focused within the urban area, with Table 7.3 of the Plan identifying that 59% of the residential supply is expected to consist of apartments.

Table 6.4 of the Housing Topic Paper provides a breakdown. This is reproduced below:

Table 6.4: Residential Land Supply - Split of houses and apartments

District	% houses 2020-2037	% apartments 2020-2037
Bolton	60	40
Bury	78	22
Manchester	16	84
Oldham	65	35
Rochdale	83	17
Salford	19	81
Tameside	60	40
Trafford	36	64
Wigan	89	11
PfE total	41	59

The HBF is concerned that this housing land supply will not relate to the needs of all different groups in the community, with a reduction in the range of variety of homes provides, and therefore is not considered to be consistent with national policy. The HBF is also concerned that if the homes that local people need and aspire to is not provided within the nine authorities that these households will look to live outside of the area, which may lead to increased commuting, and the need to travel further distances which could lead to an increased need to travel and greater emissions and could have significant implications for climate change.

⁹ Paragraph 68
¹⁰ Paragraph 62

It is well documented that the COVID-19 pandemic has led to many people re-evaluating their housing choices with priorities for city centre living shifting towards the desire for more space. A Place Alliance Report: Home Comforts¹¹ (Oct 2020) looks at what can be learnt from the COVID-19 lockdown in terms of the design of our homes and neighbourhoods. The findings, based on a national survey of 2,500 households recommended the need for new homes to have access to private open space and suggests all new homes should be built with provision for people to be able to work comfortably from home.

Aviva's Employee Back to Work Index¹² included a survey of more than 2,000 employed adults in March / April 2021. This shows that whilst people are more optimistic about returning to work there are still significant numbers (40% of those that are currently working from home) who would look to continue working home at least part of the time. Again, highlighting the need for these people to have somewhere appropriate to work at home.

Zoopla's House Price Index (November 2020)¹³ highlights that price growth for houses (4.3%) is more than double that for flats & apartments (1.8%), this difference has continued in the June House Price Index¹⁴. It states that the search for space has been a key feature of the market due to Covid-19 restrictions, as households re-evaluate their housing requirements. It goes on to state that demand for family housing with gardens, parking and extra space to work from homes has continued to rise.

This suggests that the market is already changing and may need further consideration, to ensure that the appropriate homes are provided in the nine authorities. The HBF recommends that the authorities look again at their existing stock, the market aspirations and needs, and the potential mix of their future supply.

The supply of affordable housing provision will be affected adversely by too great a concentration on the construction of apartments in the urban areas. We refer to the conclusions of the Greater Manchester Strategic Viability Assessment, September 2020, paragraphs 8.2.2 onwards. This concludes, among other things, that there are issues associated with the viability with high density schemes even in the higher value areas of the city-region. Implied by the assessment is that the supply of affordable housing may need to be subordinated if these schemes are expected to progress. In view of the political importance attached to improving the supply of affordable housing, but the viability problems associated with the construction of apartments, the Mayor will have to allocate more Green Belt land. This would enable more family houses to be built. Not only will this address directly the housing aspirations of a large element of the population, but green field development generates more positive viability results, and this will enable such schemes to provide a greater element of affordable housing.

¹¹ <https://placealliance.org.uk/research/researchhome-comforts>.

¹² <https://www.aviva.co.uk/risk/solutions/news-and-insights/2021/03/seven-in-ten-workers-feel-optimistic-about-returning-to-work-as-/>

¹³ <https://advantage.zpg.co.uk/wp-content/uploads/2020/12/Zoopla-UK-house-price-index-Dec2020-final.pdf>

¹⁴ <https://advantage.zpg.co.uk/wp-content/uploads/2021/07/UK-House-Price-June-final-1.pdf>

Similarly, housing schemes, especially on greenfield land, are much better able to pay for the infrastructure required to support development, such as open space, schools, health, education etc.

We recommend that the Mayor reconsiders the overall type mix for Greater Manchester and avoid being too prescriptive in policy. To this end we recommend that Policy JP-H 3 is re-drafted to read:

~~The precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.~~

Table 7.3 Residential Land Supply - Split of Houses and Apartments – is provided as a general guide for Local Plans. Local Plans should reflect local circumstances to deliver an appropriate mix to cater for the needs of the people.

Policy JP-H 2: Affordability of New Housing

The policy for affordable housing is unsound because it is ineffective.

This policy aims to deliver at least 50,000 additional affordable homes up to 2037, with at least 60% being for social rent or affordable rent.

The HBF supports the Mayor’s aim to provide more affordable housing across the city-region. Nonetheless, we have concerns about how the nine authorities have identified the need for 50,000 affordable homes, particularly given that 72,000 households are identified by the Places for Everyone document¹⁵ as being on the local authorities’ registers.

Table 2 below shows the level of affordable housing delivery across the nine authorities over the last five years, it shows that a total of 9,275 affordable homes have been provided over the five years or an average of 1,855 affordable homes each year. If this average was to remain over the 16 years of the plan period to 2037 this would provide 29,680 affordable homes and a long way short of the 50,000 affordable homes aimed for by the Plan.

Table 2: Affordable Homes¹⁶						
	2015-16	2016-17	2017-18	2018-19	2019-20	Total
Bolton	73	151	59	89	469	841
Bury	23	204	48	57	150	482
Manchester	157	372	629	491	381	2030
Oldham	14	197	57	148	416	832
Rochdale	65	125	65	236	193	684
Salford	264	180	353	479	260	1536

¹⁵ Paragraph 7.23

¹⁶ MHCLG Live Table 1011: additional affordable housing supply, detailed breakdown by local authority <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

Tameside	94	142	62	63	172	533
Trafford	106	57	72	124	96	455
Wigan	181	199	609	454	439	1882
Places for Everyone	977	1627	1954	2141	2576	9275

To improve the likelihood of securing more affordable housing than has been the case historically, the PfE should be amended to support two things: a) it must increase the overall requirement to support the supply of a greater number of affordable homes. We discuss this above in relation to setting the overall housing requirement; and b) it must reconsider the necessity of the accelerated target for net zero carbon homes given the greater priority for affordable housing. The Mayor could justify this on the basis that the Government’s changes to the Building Regulations will introduce a dramatic improvement in energy efficiency anyway while the supply of affordable housing is a more pressing issue locally.

Affordable housing tenure mix

We note Part 2 of the policy. The approach towards the tenure mix of the affordable housing element is appropriate. The policy expects that 60% of the affordable housing supply is provided as social rent or affordable rent. The residual 40% can accommodate other types of affordable housing products, including First Homes, which is expected to be provided at 25% of the affordable housing element. The way the policy is worded will enable the individual nine local authorities to devise affordable housing policies that are appropriate to their circumstances.

Older persons housing

The PfE Plan is unsound in connection with catering for older people. The Plan is contrary to national policy by not making specific provision for older people.

As the SHMA finds, Greater Manchester has a fast-growing older population. In accordance with national policy at paragraph 62, the Plan needs to include a specific target for older persons housing.

We note paragraph 7.29 which observes:

A diverse range of housing will be required to meet our population and household growth. Just over 70% of the population increase 2021-2037 is projected to be in those aged 65 and over. In contrast the population of those aged under 18 is projected to decrease by more than 12,000.(82) Indeed, those aged 65 and over are projected to account for large proportions of the growth in each district and ranging from 34% of the growth in Salford to 145% in Wigan and 166% in Bolton (and those under 65 in Bolton decreasing by 5,000 and those under 65 in Wigan decreasing by 6,100).

Also, paragraph 6.15 of the SHMA observes:

In Greater Manchester there will be 33.1% more people aged 65 and over living alone by 2040 rising from 145,444 in 2020 to 193,542 in 2040 – this is an increase of just over 48,000 people. This is slightly lower than the national average increase of 41.8%. In total, almost a third (32.7%) of Greater

Manchester residents aged 65 and over are expected to be living alone by 2040. There will be 48.4% more people aged 65 and over who will be living in a care home by 2040, compared to a national increase of 59.3%. 34.6% more people over 65 in Greater Manchester will be unable to carry out at least one domestic task on their own and would therefore need some form of care rising from 128,652 to 173,227 people in 2040, meaning almost 1 in 3 people aged 65 and over will need some form of care. See table 6.21 below

The Plan hopes that the needs of older people will be met by requiring more new homes to be built for Part M4 (2) – accessible and adaptable homes. This on its own will be inadequate to meet the needs of older people as it ignores the needs of the existing population whose housing requirements will change. There is the need for the construction of homes aimed specifically at the needs of older people. This will enable the existing population to decant from homes that are no longer suitable into specialist older persons housing, allowing larger family sized homes to be released for younger households. The SHMA evidence also points to the need for specialist older persons housing that provides some form of assistance or care as many single person households will struggle with tasks. Relying on the 165,000 new homes to be built to Part M4 (2) to meet the needs of both older and younger households ignores this challenge and is an inadequate response to the issue.

Like the London Plan, the Mayor should establish a benchmark performance target for each local authority based on the evidence presented in table 6.3 of the SHMA – a need for 18,634 homes in total (including Stockport). This benchmark target should be for C3 Use Class older persons housing. A separate target for C2 use class extra care bed spaces should also be established.

Policy JP-H 4 Density of New Housing

The policy is unsound because it is ineffective.

The policy requires new housing to be delivered at a density in accordance with the minimum densities specified.

We would encourage the Mayor to desist from stipulating minimum densities. This has proved to be ineffective in Greater London over the last fifteen years culminating in the Mayor of London abandoning the density matrix for the latest version of the London Plan (2021). The reason being that housebuilders always met or exceeded the minimum densities stipulated, but the density matrix became an instrument used by opponents to resist denser developments.

In truth, developers will build as densely as is necessary for reasons of viability, with this tempered to a degree by aesthetic considerations plus the practical needs of purchasers / residents (garden space, car parking etc).

Policy JP-G 6 Urban Green Space

The policy is unsound because it is ineffective.

In addition to its recreational benefits, it would be helpful if the Mayor could clarify if the provision of urban green space in line with this policy can also contribute towards biodiversity gain targets, in line with Policy JP-G 9, where planting is provided. We think that this should be allowed, and it would be helpful if the policy stated this.

Policy JP-G 9 A Net Enhancement of Biodiversity and Geodiversity

The Policy states that 'across the plan as a whole, a net enhancement of biodiversity resources will be sought'. We agree that biodiversity gain should be able to be provided across the whole plan area, if it cannot be provided in full onsite. This would enable a builder to provide a net gain in another Greater Manchester borough, if s/he is unable to do so entirely within the development itself. Therefore, a development in Manchester City could achieve a net gain by providing a green project in Bury.

This would be welcome as it would help developers meet their new obligations in the Environment Bill. The Mayor should clarify if this is his intent.

Policy JP-G 10 The Green Belt

This policy is superfluous as it adds nothing more to national policy.

The policy repeats what is in national policy and guidance. We recommend that it is deleted. The diagram showing the extent of the green belt is needed and the supporting text should be retained.

Policy JP-G 11 Safeguarded Land

The policy approach to safeguarded land is unsound because it is ineffective.

The last part of the policy states:

Where the release of safeguarded land can be justified, this will be done through a review of this Plan or through the preparation of a local planning authority's local plan.

The PfE Plan acknowledges that Safeguarded Land can provide a reserve of land to meet development needs in the longer term without having to encroach on Green Belt. We recognise that these longer terms needs are expected to occur after the end date of the PfE Plan in 2037. However, it is also possible that the need to develop this land could occur sooner than expected and within the plan period envisaged. In which case a policy that says that the release of this land would depend on a plan review (PfE or local plan review) would add great delay.

Also, we note that only one area - Land adjacent to the proposed HS2 Manchester Airport Station – has been identified. There are no other sites. Some local authorities have very little in the way of reserves if their land-supply assumptions prove to be flawed/overoptimistic. See the discussion above relating to the housing land supply with reference to Table 0.1 of the Housing Topic Paper, July 2021. This could represent a risk to the delivery of the housing



and employment objectives of the PfE Plan. The Mayor should identify more safeguarded land as a contingency. This will help sustain delivery in the event of other strategic allocations failing to be developed quickly enough.

Future Engagement

We hope the Council will find these comments useful as it progresses the PfE Plan. We 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 all forthcoming consultations or news relating to the PfE Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely

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