

Matter 3 – Policies and Designations

Main issue:

Are the individual policies and designations clear, positively prepared, justified and effective and are they consistent with national policy?

Climate Change – Policy CC1

Policy CC1: Climate Change

3.12 What is the specific purpose of Policy CC1? Is to simply provide a reference to the contribution that several policies of the submitted Plan seek to make towards tackling climate change? If so, is the policy merely duplicating details in other policies and therefore is it necessary? Is the policy, as submitted, justified, effective and consistent with national policy?

1. Policy CC1 appears to simply provide a reference point to the contribution that a number of the proposed policies make to climate change, the HBF does not consider that the policy is necessary and should be deleted. The HBF does not consider that the policy is consistent with the NPPF¹ as the policy is not clearly written and it is not evident how a decision maker should react to development proposals using this policy, it also does not serve a clear purpose or avoid unnecessary duplication.

3.13 It is noted that the evidence supporting Policy CC1 and other policies such as Policy EG1 to justify the 2028 and 2038 carbon neutral targets set out in the strategic objectives for the Plan is based on the Greater Manchester metropolitan area to support the GMSF rather than the Salford City area for which specific evidence is indicated to be limited.

Notwithstanding this, is the evidential approach taken appropriate, adequate, reasonable, justified and effective in supporting Policy CC1 and the submitted Plan in tackling climate change?

2. The Council have produced a Zero net carbon and carbon neutrality background paper (Feb 2021). It highlights the information provided at a Greater Manchester level by the Tyndall Manchester Climate Change Research, and the Setting City Area Targets Trajectories for Emissions Reductions (SCATTER). The Paper also highlights that the Viability Assessment has been updated, to include costs associated with the Future Homes Standard but does not make an allowance for net zero by 2028 given the uncertainties associated with the costs of this, the assessment continues to show issues with viability. The HBF considers that the Paper continues to provide limited Salford specific evidence in relation to the need for this policy.

Planning Conditions and Obligations – Policy PC1

Policy PC1: Planning Conditions and Obligations

3.16 Is Policy PC1 positively prepared, justified and effective in delivering sustainable development and providing necessary infrastructure to support development?

3. The HBF does not wish to comment on this question at this time.

3.17 Is the policy reasonable, justified and effective in relation to the artificial splitting of sites, identifying priorities for the use of planning obligations, long term maintenance and

¹ Paragraph 16 of NPPF 2021

reduced planning obligations through means of viability appraisal? What evidence is there to justify this? Is the policy consistent with national planning policy?

4. The HBF considers it can be beneficial to include a policy that acknowledges there may be circumstances where reduced planning obligations are appropriate. However, it is important that the policy does not create unnecessary uncertainty and additional risk for developers. For example, a clawback mechanism could create an impediment to development particularly for the deliverability of sites that may be phased or implemented over a long period of time.

Housing – Policies H1-H10 (inclusive)

Policy H1: Type of Housing

3.33 Is the housing mix sought by the Plan in terms of type and tenure justified? Are the housing policies as a whole effective in delivering the identified proportions of housing types and tenures for Salford?

5. The HBF understands the need for a mix of dwelling types and is generally supportive of providing a range and choice of homes to meet the needs of the local area. However, the HBF is concerned that this policy will not be effective in providing an appropriate balance of homes across Salford if an appropriate range of supply of housing land is not provided.
6. The HBF does not consider that the requirements of this policy have been justified by evidence, it is not clear from the policy or the justification why these requirements are being set and how they will help to contribute to an appropriate mix of homes across Salford and how these will meet local needs.

3.34 Policy H1 point B) states that, in areas of Salford outside of City Centre Salford, Ordsall Waterfront and Salford Quays, at least 80% of the net increase in dwellings will be houses. How has that proportion of the overall net dwelling increase in Salford been identified? Where is the evidence to support this?

7. Policy H1 and the justification text do not detail what evidence has been used to identify the type of housing that is required by the policy. The Greater Manchester SHMA (2019) identifies potential scenarios and indicative proportions of house types across Greater Manchester, it does not provide a detailed breakdown for areas within Salford.

3.35 Does Policy H1 provide sufficient flexibility in terms of providing a broad range of housing types in suitable locations across Salford?

8. The HBF does not consider that this policy provides sufficient flexibility in terms of the range of house types to be provided in suitable locations across Salford. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs, demand and aspiration will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

3.36 When read as a whole, is Policy H1 reasonable, justified, effective and consistent with national policy?

9. The HBF does not consider that Policy H1 is justified, if appropriate evidence is provided to support the policy, the HBF considers that the policy should be amended to increase the flexibility of the policy.

Policy H2: Size of Dwellings

3.37 Does Policy H2 provide sufficient flexibility in terms of providing an appropriate and balanced mix of dwelling sizes across Salford?

10. The HBF does not consider that Policy H2 provides sufficient flexibility in terms of providing an appropriate and balanced mix of dwellings across Salford. The HBF recommends that a flexible approach is taken regarding the size of dwellings which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

3.38 What is the basis and justification for the 50% proportion of new apartment developments being at least two bedrooms as set out in Policy H2? Is this supported by appropriate evidence?

11. Policy H2 and the justification text do not detail what evidence has been used to identify the size of housing that is required by the policy. The Greater Manchester SHMA (2019) identifies potential scenarios and indicative proportions of house types and sizes across Greater Manchester, it does not provide a detailed breakdown for Salford or the types of housing within Salford.

3.39 When read as a whole, with regard to bedrooms, space standards and houses in multiple occupation, is Policy H2 reasonable, justified, effective and consistent with national policy? What evidence is there to support this?

12. The HBF does not consider that Policy H2 is justified or consistent with national policy. The HBF does not consider that there is appropriate evidence to support the requirements within the policy.

13. Policy H2 contains a requirement for all dwellings in new build developments to meet as a minimum the nationally described space standards (NDSS). PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

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

14. The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. The HBF does not consider the need for

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the use of the NDSS has been adequately demonstrated. The Housing Technical Standards Report (January 2020) has been produced by the Council, however, the evidence provided is limited in terms of the numbers of properties considered and the timeframe over which permissions were considered. It is not evident from the information provided what 'need' there actually is for properties built to the standards there is no evidence that these smaller properties are not selling, there is no evidence provided that customers are not satisfied with these properties or that these properties are not comparable to other properties available in the market area. The HBF considers that if the Government had just expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

15. The HBF considers that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market. The HBF would be interested to know if the Council has considered how the policy may impact on the house price of the properties, as dwellings increase in size, and whether they have considered whether this house price is realistic given similar properties on the market or whether the market is able to accommodate any price increases.
16. It should be noted that the HBF's Annual Industry Customer Satisfaction Survey² published March 2021 and completed by 76,300 new homeowners highlights that 92% of people who have bought a new home would do so again. It also highlights that 94% of homeowners are satisfied with the internal design and layout of their new home. This does not suggest that new homeowners have issues with the size of rooms provided or that there is a need for the NDSS to be introduced.
17. The Assessment of Residential Viability (Jan 2020) has not specifically assessed the viability of the NDSS, it has just assumed that all homes will be built to this standard. However, it is notable that there are a number of schemes within the baseline appraisal that are not viable which suggests that NDSS may already be contributing to the potential viability issues of development within Salford. This is further compounded when the policy requirements and planning obligations, not including affordable housing, are also considered (Table 27), where 8 of the 15 schemes assessed are considered to be unviable. Therefore, the HBF have concerns that a number of policy requirements, including the NDSS, may contribute to the non-delivery of homes due to a lack of viability.
18. The HBF recommends that the element of this policy in relation to space standards should be deleted as it is not considered to be justified or consistent with national policy. However, if it is retained the HBF consider that the Council should include a transitional

² <https://www.hbf.co.uk/policy/policy-and-wider-work-program/customer-satisfaction-survey/latest-results/>

period in line with the requirements of the PPG and acknowledge that there may be impacts on the viability of development. The HBF recommends a transitional period that reflects the time it takes to bring a site forward from land purchase negotiations to application.

Policy H3: Housing Density

3.40 What evidence and justification is there to support the minimum dwelling densities in various locations across Salford as set out in Policy H3? Are these policy requirements reasonable, effective and achievable?

19. Policy H3 and the justification text do not detail what evidence has been used to identify the density of housing that is required by the policy. It is not apparent if these densities are reflective of the character of the areas where they are proposed, or whether they are intended to amend the character of these areas to see increased densities. It is not apparent from the policy whether consideration has been given to how realistic these policies are in relation to other policy requirements for example those in relation to design, street tree provision, housing mix, space standards, open space provision, parking requirements, SuDs and emerging policy requirements such as biodiversity net gain, updates to the buildings regulations (i.e. provision of heat pumps) and the future homes standards.

3.41 Does Policy H3 provide enough flexibility with regard to the density requirements for development proposals it sets, particularly when considering such things as local housing market conditions and site-specific issues? Is Policy H3 reasonable, justified and effective in this regard and when considered as a whole? Is it consistent with national policy?

20. The flexibility provided by this policy in relation to certain exceptions is noted, this will allow developers to react to some site-specific issues. However, further amendments could be made to create greater flexibility to allow developers to take account of the evidence in relation to market aspirations and viability.

Policy H4: Affordable Housing

3.42 The Council's residential viability evidence does not appear to support the Council's position as set out in Policy H4. For example, in representations it is stated that the Report does not show high density apartment development to be viable in areas other than 'premium' or 'high quality' locations. Notwithstanding this, Policy H4 indicates a minimum affordable housing requirement of 20% across all value areas in Salford. Is the minimum affordable housing requirement set out in Policy H4 reasonable and adequately justified by the supporting viability evidence, including the viability addendum report by Three Dragons?

21. Policy H4 states that all development that provide 10 or more net dwellings shall deliver at least 20% affordable housing, it sets higher requirements in some areas for some dwelling types. The Residential Viability – Addendum Report (January 2021) provides an assessment of the viability of development in Salford, section 6 provides the results of the testing undertaken. The charts within this section clearly identify the significant viability issues within Salford:

- a. Figure 6.2 continues to show that there are viability issues within the premium value areas for Site Typologies 1,2 and 3 (1,500 flats (15 storeys), 1,500 flats (8 storeys) and 375 flats (11 storeys)) and that they cannot support the 20% affordable housing requirement.

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- b. Figure 6.5 and Figure 6.8 also continue to show that there are viability issues within the high value areas and mid-high value areas, for Site Typologies 1, 2 and 3 and that they cannot support the 20% affordable housing requirement.
 - c. Figure 6.11 shows that there are viability issues within the mid value areas for Typologies 4, 5, 6 and 7 (375 flats (5 storeys), 150 flats (5 storeys), 50 flats (3 storeys), and 10 flats (3 storeys)) and that they cannot support the 20% affordable housing requirement.
 - d. Figure 6.12 also shows that there are viability issues for Typology 9 for 150 houses within the mid-area when the 20% affordable housing requirement is applied and Figure 6.13 shows the viability issues for the mixed developments with typology 14 and 15 not being viable when the 20% requirement is applied.
 - e. Figure 6.14 and 6.15 shows that there are viability issues for housing typologies 8, 9, 10, and 11 and for the mixed typologies 14 and 15 when the 20% affordable housing requirement is considered.
 - f. Figure 6.16 and 6.17 again show viability issues for housing typologies 8, 9, 10, and 11 and for the mixed typologies 14 and 15 when the 20% affordable housing requirement is considered.
 - g. Figure 6.19 to 6.21 again show viability issues for housing typology 21 “older Persons sheltered housing” with it being unviable with any affordable housing except in premium locations
22. The Residential Viability – Addendum Report has then gone on to consider some further sensitivity testing looking at the developer return and building costs. The original assessments had included a developer return of 17.5% whilst the sensitivity testing has looked at both higher and lower returns, it is noted this is in response to representor feedback where the development industry were suggesting that the return should be moved closer to the 20% to reflect the risks involved in bringing forward brownfield sites in this market. Therefore, consideration of a lower developer return is likely to be inappropriate and lead to less development being delivered. The next sensitivity test is in relation to the build costs, where the assessment has considered the implications of a reduction of costs from £2,050 per sq m to £1,800 per sq m along with the lower developer return of 15%. The HBF does not consider that this appropriate, it is clear that build costs are currently increasing rather than decreasing and that as mentioned previously any reduction in the developer return would not be supported. However, it is noted that even with the unsuitable adjustments the assessment continues to show that site typologies 2 and 3 are still not viable with a 20% housing requirement in the premium areas.
23. The HBF does not dispute the need for affordable housing within Salford and indeed supports the need to address the affordable housing requirements of the borough. The NPPF³ is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and that any affordable housing policies should not undermine the deliverability of the plan. The HBF considers that the evidence clearly shows that the affordable housing requirement set out in Policy H4 is not reasonable and

³ Paragraph 34 of NPPF2021

not justified and as such the policy should be amended to reduce or remove the affordable housing requirement as shown to be appropriate by the evidence.

3.43 Is the evidence to support Policy H4 sufficiently robust to justify the minimum 20% affordable housing requirement in all major development in all value areas in Salford, as Policy H4 sets out? Are the assumptions set out in the Three Dragons report [ref: SD022] relating to reduced build costs and developer returns which leads to indicated viability reasonable, justified and achievable?

24. Please see response to question 3.42 above.

3.44 Is Policy H4 sufficiently clear about how and when off-site provision of affordable housing or the payment of a commuted sum will be most appropriate and acceptable? Will it be effective in this regard?

25. The HBF does not wish to comment on this question at this time.

3.45 Does Policy H4 offer sufficient flexibility in the requirement and delivery of affordable housing through development proposals? Is the overall approach to affordable housing in the Plan - based on the evidence identified - reasonable, justified, effective and robust?

26. The HBF notes that the policy includes an element that allows for a reduced proportion of affordable housing where it has been clearly demonstrated that all practicable options have been exhausted and that the requirements of Policy PC1 have been met. The HBF appreciates the flexibility this element of the policy applies, but does not consider that this is sufficient to overcome introducing a policy that is shown to not be viable for a significant number of site typologies and areas within Salford.

3.46 When considered in its entirety, is Policy H4 positively prepared, justified, effective and consistent with national policy?

27. For the reasons set out above the HBF does not consider that Policy H4 is positively prepared, justified or consistent with national policy. The HBF considers that the policy should be amended to reflect the evidence.

Policy H6: Housing for Older People

Policy H7: Student Housing

3.49 With regard to the above policies H6 and H7, as submitted, are each of these policies appropriate, reasonable, justified, effective and consistent with national policy? If not, how should the identified policy be modified to be made sound?

28. The HBF does not consider that Policy H6 is appropriate, reasonable, justified or consistent with national policy. The PPG⁴ 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. The HBF does not consider that the Council have provided sufficient evidence for this policy to be considered justified or consistent with national policy.

⁴ ID: 56-007-20150327

29. The Housing Technical Standards report (Jan 2020) provides the Council's evidence in relation to housing accessibility standards. Whilst the report does provide some evidence of need it is not clear why this necessitates all homes to be built to M4(2), it also provides limited information on the requirements in terms of size, location and type of dwellings needed. The report itself identifies that there is no data specifically with regards to the accessibility and adaptability of the current housing stock in Salford. Therefore, it is questionable whether the requirements of the PPG have been met.
30. As has been previously set out, the Residential Viability – Addendum Report (Jan 2021) highlights the identified viability issues in Salford, with a significant number of schemes considered as unviable. The HBF has concerns that requiring all new dwellings to meet the M4(2) standards will significantly impact on the viability of development, particularly when considered cumulatively with other requirements, and therefore consider that the policy should be deleted, or the requirement reduced.

Policy H9: Custom, Self-Build and Community-led Housing

Policy H10: Conversion and Change of Use of Existing Houses and New Build Residential Developments of Non-Self-Contained Units

3.54 With regard to the above policies H9 and H10, as submitted, are each of these policies appropriate, reasonable, justified, effective and consistent with national policy? If not, how should the identified policy be modified to be made sound?

31. The HBF does not consider that Policy H9 is appropriate, justified or consistent with national policy. The policy encourages developers of larger sites to make plots available for custom, self-build and community-led housing as part of their development. The HBF is not opposed to the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. In fact, some 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. However, the HBF has concerns in relation to this policy approach which only changes the house building delivery mechanism from one form of house building company to another without any consequential additional contribution to boosting housing supply and with limited detail as to how and when developers will be encouraged to make these plots available and at what level.
32. Under the Self Build & Custom Housebuilding Act 2015 and 2021 NPPF⁵, it is the Council's responsibility, not the landowner's or developer's, to ensure that sufficient permissions are given to meet demand. The Council is not empowered to restrict the use of land to deliver self & custom build housing. The PPG sets out ways in which the Council should consider supporting self & custom build by "engaging" with developers and landowners and "encouraging" them to consider self & custom build "where they are interested"⁶.
33. The Council should ensure that the Local Plan will result in a wide range of different self & custom build housing opportunities. It is unlikely that self & custom build serviced plots

⁵ Paragraph 62

⁶ ID 57-025-201760728

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on larger residential sites will appeal to those wishing to build their own home. The HBF considers that the provision of a certain percentage self-build plots on schemes above a certain size adds to the complexity and logistics of development and may lead to the slower delivery of homes. The provision of self-build plots on new housing developments cannot be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site, from both a practical and health & safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. Furthermore, any differential between the lead-in times / build out rates of self-build plots and the development of the wider site will result in construction work outside of specified working hours, building materials stored outside of designated compound areas, etc and unfinished plots next to completed / occupied dwellings causing customer dissatisfaction.

34. Where plots are not sold, these plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original developer should be as short as possible because consequential delay presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original developer has completed the development and is forced to return to site to build out plots, which have not been sold to self-builders.
35. As well as on-site practicalities, any impacts on viability should be tested and additional costs should be fully accounted for in the Council's viability assessment. The inclusion of self-build plots will have a fundamental bearing on the development economics of the scheme. Site externals, site overheads, and enabling infrastructure costs are fixed and borne by the site developer. The developer will also have borne up front site promotion costs, including planning and acquisition costs. It is unlikely that these costs will be recouped because the plot price a self-builder is able to pay is constrained by much higher build costs for self-build. Profit obtainable if the house was built and sold on the open market by the site developer is foregone.

Accessibility – Policies A1–A13 (inclusive)

3.69 Having regard to the relevant proposed amendments to the Building Regulations, is Policy A10 necessary to introduce requirements for the provision of electric vehicle charging points in residential and non-residential buildings?

36. The Government has consulted on Electric Vehicle Charging in Residential and Non-Residential Buildings⁷. This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010. 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. 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

⁷ <https://www.gov.uk/government/consultations/electric-vehicle-chargepoints-in-residential-and-non-residential-buildings>

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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 consider that this policy is unnecessary.

3.70 In relation to the proposed modifications to Policy A10 regarding guidance on exemptions to the provision of electric vehicle charging points in residential and non-residential buildings, are these changes reasonable, justified, effective and consistent with national policy and requirements? Do the proposed modifications provide enough flexibility within Policy A10 for the delivery, or otherwise, of such facilities within developments in relation to site specific circumstances?

37. The HBF considers that the additional proposed text in relation to not applying the requirements where there are exceptionally high costs in relation to the securing of additional electrical capacity is appropriate if the policy is to be retained.

3.71 Have each of the accessibility policies (A1-A13 inclusive), as submitted, been positively prepared? Are they reasonable, appropriate and proportionate? Are they justified, effective and consistent with national policy? If not, how should any particular policy identified be modified to be made sound?

38. The HBF considers that Policy A10 is not justified or consistent with national policy, provides unnecessary duplication and should be deleted.

Energy – Policies EG1 and EG2

Note: *In response to representations, the Council now proposes modifications to Policy EG1 in the submitted Plan relating to district heating networks, the use of a range of heat sources and encouraging the use of waste heat to contribute towards meeting local energy needs.*

3.73 Are the proposed changes to Policy EG1 reasonable and appropriate. Is Policy EG1 consistent with other relevant policies in the submitted Plan, including Policy CC1: Climate Change, with regard to having sufficient flexibility to deliver sustainable development and to meet Salford's carbon neutral targets? Is the proposed amended Policy EG1 justified, effective and consistent with national policy in these respects?

39. Policy EG1 states that all new development shall be net zero carbon from 2028 and that all residential development: Exceed the fabric energy efficiency required under Part L of the Building Regulations 2013 by at least 19%, and exceed the standard required by any subsequent revision to Part L. The Council has prepared a Renewable and Low Carbon Energy Opportunities Paper (Jan 2020) however, there is very limited information and evidence contained within this document that to justify or evidence these requirements. Therefore, the HBF does not consider that this policy is justified.

40. This policy also goes on to require developments involving ten or more dwellings to connect into the heat network. The HBF does not consider that Salford should be requiring developments to connect to or restricting the use of particular heating methods. The HBF considers that consideration needs to be given to the justification to this policy.

41. 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 Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies.
42. If the policy is to be taken forward then consideration needs to be given not just to whether the development is technically viable but also financially viable and subject to viability testing. The HBF also considers that this policy may cause issues for future occupants as it is restricting future consumer choice to that particular provider of heat. The HBF consider that the cost for enabling or safeguarding the space for such connections is likely to be significant and could have implications for the viability of development.

Design: Policies D1–D9 (inclusive)

3.77 Through the above design policies (D1-D9 inclusive), does the submitted Plan take an appropriate, reasonable, justified and suitably evidence-based approach to design matters?

i) What is the context for these design policies being included in the Plan? For example, are these policies simply a continuation of existing policies from the adopted Salford UDP?

ii) Is the submitted Plan and its design policies sufficiently clear and consistent with national policy and other relevant local and national design frameworks, strategies and guidance?

iii) Do these policies have the support of relevant partner organisations, agencies etc? If so, where is this support identified and set out? If not, why?

iv) Do any of these design policies require necessary modification to be made sound?

43. Policy D7 requires all residential development to meet the nationally described space standards (NDSS) in accordance with the requirements set out in Policy H2. The HBF does not consider that it is necessary for this policy to reiterate the requirements of Policy H2 and that this element should be deleted. The HBF has set out their concerns in relation to the requirement for the NDSS in response to questions 3.37 to 3.39.

44. Policy D7 requires all residential development to be accessible and adaptable in accordance with requirement M4(2) except where it can be clearly demonstrated that this is impracticable due to site specific factors. This also appears to be repetition of the requirements of policy H6, and therefore is not necessary. The PPG⁸ 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. The HBF does not consider that the Council have provided the evidence to support this requirement and considers that this requirement should be deleted.

⁸ ID: 56-007-20150327

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

3.79 With regard to representations made in relation to Policy D7, is the policy's encouragement of development to perform beyond the fabric energy efficiency requirements of Part L of the Building Regulations 2013 using specific measures, reasonable, justified and consistent with other policies in the submitted Plan such as Policy EG1: Sustainable Energy and Policy CC1: Climate Change in terms of delivering sustainable development?

Note: *Question 3.79 above is with particular regard to points made in representations relating to specific measures being identified as not necessarily representing the best metric to measure sustainable development.*

46. The HBF does not consider that it is necessary for this policy to reiterate the requirements of Policy EG1 and that this element should be deleted. The HBF has set out their concerns in relation Part L of the Building Regulations in response to question 3.73.

47. There appears to be a significant proportion of unnecessary repetition within this policy, and the HBF would query if many elements of this policy are required.