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10/07/2022

Dear Planning Policy Team,

SALFORD LOCAL PLAN: DEVELOPMENT MANAGEMENT POLICIES AND DESIGNATIONS MAIN MODIFICATIONS CONSULTATION

1. Thank you for consulting with the Home Builders Federation (HBF) on the Salford Local Plan Development Management Policies and Designations Main Modifications consultation.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The HBF would like to submit the following comments on the proposed Main Modifications.

Policy CC1 Climate change

4. The Council are not proposing to modify this policy. However, part 6 of this policy looks for residential development to exceed the fabric energy efficiency required under Part L of the Building Regulations 2013 by 19%. The HBF notes that the Building Regulations Part L have been updated in 2021 and the Fabric Energy Efficiency metric will be amended, with the regulations adopting the 'full FEES' target. This will likely require improvements across numerous areas of specification compared to Part L 2013. Therefore, the HBF considers that this element of the policy is no longer required and can be deleted.

AM017: Policy PC1 Planning Conditions and Obligations

5. The Council have proposed to modify the first section of this policy to include 'for which other sources of funding have not been secured in full', this appears an appropriate modification.



6. In relation to reduced planning obligations, the Council proposed to amend (i) to delete reference to what has changed since the Plan Viability Assessment was prepared and instead makes reference to justifying the level of planning obligations proposed. The HBF considers that this seems an appropriate modification.

MM009: Policy H2 Size of dwellings

7. The Council propose to amend this policy in relation to the requirement for all new dwellings to meet the nationally described space standards (NDSS). The proposed amendment states that there will be an exception to this where justified by local housing market issues such as a demonstrable need for a particular size of housing. The HBF considers that this is an appropriate modification. However, the HBF continues to consider that the policy is not sound as it is not in line with national guidance and that the Council should include a transitional 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 of at least one year from the adoption of the Plan.

MM025: Policy A10 Electric vehicle charging points

8. The Council will be aware that Part S of the Building Regulations has been updated and the changes are effective from June 2022. The HBF therefore considers that this policy is not sound as it is repeating other areas of regulation and may lead to confusion and unnecessary restrictions as developments try to ensure alignment with both requirements. The HBF considers that this policy should be deleted.

MM0026 & MM027: Policy EG1 Sustainable energy

9. The HBF notes that the Council propose to amend part B of this policy to state 'or meet the standard required by any subsequent revision to Part L of the Building Regulations'. The Council will be aware that the Building Regulations Part L and F have been updated in 2021 and that changes are effective from June 2022. The HBF considers that the Council should delete both sections A and B of this policy and refer to the latest Building Regulations instead. This reduces duplication, and opportunities for any contradictions or inconsistencies between the requirements for Planning and Building Control. It is also continues to support the Council in moving towards more energy efficient buildings.

Future Engagement

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

Yours sincerely,



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