

Draft SLP: CSA consultation,
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SENT BY EMAIL
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13/02/2025

Dear Planning Policy Team,

SALFORD LOCAL PLAN: DRAFT CORE STRATEGY AND ALLOCATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Draft Salford Local Plan Core Strategy and Allocations consultation document.
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 notes that the Plan states that the Salford Local Plan: Development Management Policies and Designations and Places for Everyone are both part one Local Plans, and that this current document is intended to be Part 2 of the Salford Local Plan. However, it is also noted that paragraph 1.18 states that all of the policies in the Core Strategy and Allocations Plan are strategic ones.
4. A new NPPF has been published during the consultation period for this Plan, it includes transitional arrangements for where a Plan includes policies to deliver the level of housing and other development set out in a preceding local plan adopted since March 2020, this may need to be taken into consideration by the Council as part of their work on this document.

Plan period

5. The Scoping document suggests that the Core Strategy and Allocations document will apply to the whole of Salford for the period up to 2041. The NPPF¹ states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery. The HBF considers that the Plan period to 2041 may not be appropriate and it is important that the Plan provides a 15-year period at the point at

¹ NPPF 2024 Paragraph 22 / NPPF December 2023 paragraph 22



which the Plan is adopted and where larger scale developments, such as those included in the Places for Everyone (PfE) document are proposed in the Plan, then a longer period may be required to take account of the timescale for their delivery.

Policy SS1: Overall Strategy

6. This policy states that the Council will over the period 1 April 2022 to 31 March 2042 make provision for at least 33,160 net additional dwellings, with this phased at an average of 1,658 dwellings per annum (dpa). This is in line with the PfE document which provides a distribution and phasing for housing in the PfE area as part of Policy JP-H1. The HBF also notes that this housing figure is above the LHN as identified by the standard method, which identifies a LHN of 1,308dpa for Salford.
7. Part 2 (c) suggests that the Council will support Salford becoming carbon neutral by 2038 by minimising carbon emissions, maximising carbon storage and sequestration. This is generally in line with the PfE, which sets out their ambitions for the area to be carbon neutral by 2038.
8. The PPG² provides examples of mitigating climate change by reducing emissions: through reducing the need to travel and providing sustainable transport; providing opportunities for renewable and low carbon energy technologies; providing opportunities for decentralised energy and heating; and promoting low carbon design approaches to reduce energy consumption in buildings. The HBF recommends that the Council seek to ensure that they produce a sustainable Plan which supports a balance of homes and employment and is in line with the guidance provided by the NPPF and the PPG.
9. The HBF considers that it is important that the Council does not set its own standards for development which may differ from the approach being taken by national Government, and that any such policy in relation to low carbon, local heat and energy solutions are implemented on a flexible basis, and that the Council recognise the decarbonisation of the national grid. This would be in line with the Written Ministerial Statement of December 2023³. The Council will also be aware that the Future Homes and Buildings Standards: 2023 consultation⁴ has been released covering Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating).
10. Part 2(e) of the policy seeks to deliver this growth by maximizing the use of suitable previously developed land and vacant buildings for development, with at least 85% of new dwellings to be on such sites. Whilst Part (f) looks to focus the majority of new dwellings (in the form of apartments and duplexes) within the City Centre and Salford Quays, and (g) suggests a strong focus on the provision of houses in new development proposals within the Inner and Northern Areas.

² PPG ID: 6-003-20140612

³ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/HCWS123>

⁴ <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

11. The NPPF⁵ states that planning policies should promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. It goes on to state that planning policies should give substantial weight to the value of using suitable brownfield land within settlements for homes. The HBF considers that the Council should seek to allocate brownfield land for development where it is appropriate and deliverable and where it will contribute to the spatial strategy. However, the HBF also considers that the Council will need to ensure that they have provided homes to meet all of the local needs across the housing market, this may not always be sufficiently addressed by brownfield land.
12. Part 2(p) policy seeks to deliver this growth by supporting at least a 10% net gain in biodiversity as part of new developments. BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a biodiversity net gain of 10%. In light of all the new guidance on Biodiversity Net Gain (BNG) that has recently been published, the Council will need to ensure its approach to BNG to ensure it fully reflects all the new legislation, national policy and guidance. The HBF notes that there is a lot of new information for the Council to work through and consider the implications of, in order to ensure that any policy on BNG policy so that it complies with the latest policy and guidance now this has been finalised. It is important that mandatory BNG does not frustrate or delay the delivery of much needed homes.
13. The PPG⁶ is clear that there is no need for individual Local Plans to repeat national BNG guidance. It is HBF's opinion that the Council should not deviate from the Government's requirement for 10% biodiversity net gain as set out in the Environment Act and that it is not necessary to state 'at least' within the policy. The HBF also notes that there are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment.

Allocations

14. The HBF has no comments on the proposed housing allocations and these representations are submitted without prejudice to any comments made by other parties. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.
15. The Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver Salford's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS), and achieve Housing Delivery Test (HDT) performance measurements. The HBF also strongly recommends that the plan allocates

⁵ NPPF December 2024 paragraph 124 / NPPF Dec 2023 paragraph 123 & 124

⁶ PPG ID: 74-006-20240214

more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites and to provide flexibility and choice within the market. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.

16. The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market.
17. The Council should ensure that it has identified at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.
18. The HBF would also encourage the Council to ensure the Local Plan fully considers the new BNG requirements in relation to site allocations. This is likely to require undertaking an assessment of the baseline to support the allocation to enable an understanding of the BNG requirements for a site to be allocated and the impact this may have on viability and other policy requirements and considerations. It will be important to understand the costs of mandatory BNG as this is non-negotiable and as such may impact on the viability of the site and its ability to deliver against other policy requirements such as affordable housing or other s106 asks.
19. BNG will also impacts on the density of housing schemes that can be provided, as land used for on-site BNG is not available for housing. This may require larger and/or additional housing sites to be allocated.

Viability

20. The Council will also need to ensure that they have considered viability, viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, sites are deliverable and that the total cumulative sots of all relevant policies will not undermine deliverability of the Plan. The Council need to ensure that policy requirements are set at a level that takes account of affordable housing and infrastructure needs and allows for the site allocations and planned development to be deliverable without need for further viability assessment at the decision-making stage.

Future Engagement

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Joanne Harding', with a stylized flourish at the end.

Joanne Harding
Planning Manager – Local Plan (North)

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