



THE HOME BUILDERS FEDERATION

GMSF IA Scoping Report Consultation
Greater Manchester Integrated Support Team
Room 308
Manchester Town Hall
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Manchester
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Date: 1st September 2015

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Sent by Email only

Dear Sir / Madam,

GMSF IA Scoping Report Consultation

Thank you for providing the Home Builders Federation (HBF) with the opportunity to comment upon the GMSF IA Scoping Report Consultation.

The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.

Consultation Questions

We would like to submit the following comments to the questions posed in the consultation.

Have we identified all of the key sustainability issues?

The report attempts to identify the key sustainability issues but due to missing data, and the misrepresentation of some data, we have a number of fundamental concerns with how they have been presented. These are explored in greater detail against the baseline evidence below.

Does the range of IA objectives and assessment criteria provide a robust framework from which we can assess the likely significant effects of the GMSF?

No, the HBF does not consider that all aspects of the assessment framework are sufficiently robust. These are set out below;

Objective 1: Provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect needs

It is considered that the objective could be more positively worded to reflect the national need to significantly boost housing supply. This is particularly important if Greater Manchester is to achieve its stated ambition of becoming one of the most successful cities in the world.

The first assessment criteria is particularly problematic and is not consistent with national planning policy. This criterion seeks to; *‘Ensure an appropriate quantity of housing land to satisfy demand’*. This is a misinterpretation of national policy. The NPPF specifically refers to meeting the housing needs of the area (paragraphs 7, 14, 16, 17, 47, 50 and 54). Paragraph 47 provides further clarification stating;

‘To boost significantly the supply of housing, local planning authorities should:

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area,....’*

This is very different from housing demand as referred to within the assessment criteria. Furthermore the assessment criteria also refer to *‘appropriate quantity’* this implies that a requirement less than the objectively assessed housing needs (OAHN) may be considered. To provide a more robust framework it is important that the OAHN is sought to be met as a minimum.

Objective 2: Promote sustainable economic growth and job creation

This objective should be strengthened. In its current format neither the objective nor the assessment criteria provide the positive focus upon increasing growth above previous levels. If Greater Manchester is to truly become one of the most successful cities in the world it will need to grow at a faster rate than the recent past.

Objective 17: Improve efficiency in land use through the re-use of previously developed land and existing buildings whilst reducing land contamination

The objective and assessment criteria indicate a focus upon previously developed land. Whilst previously developed land will be an important component of land supply other sources will also be required. The objective should be more focused upon ensuring that the housing and employment needs of the area can be delivered. The HBF recommend the GMSF should seek a balanced portfolio of sites which provide the maximum opportunities to deliver the employment and housing land required to foster the economic potential of Greater Manchester. The objective and assessment criteria should therefore acknowledge the need for other types of land over and above that which is previously developed.

Are there any new or additional sources of baseline evidence that should be included in the IA?

The IA scoping report identifies a wide range of data sources which are largely considered appropriate. The key issues of concern for the HBF are those relating to housing. In this regard we make the following comments.

Population and Demographics

The IA scoping report does not include any information upon net migration trends. It is recommended that both internal and international migration be considered. Migration will be a key issue in determining the future population of Greater Manchester and in turn the housing requirement set within the GMSF. Given the recent announcement by Government, 27th August 2015, that net inward international migration into the UK has hit an all-time high this is likely to be a significant issue over the lifetime of the GMSF. It is therefore imperative that a baseline position is included which considers both short-term and longer-term migrations trends.

Table 8 refers to the 2012 household projections, whilst these provide a context, it must be recognised that alone they do not constitute an objectively OAHN for Greater Manchester or its constituent authorities. The 2012 household projections indicate what would happen if past trends were to continue into the future. Recently these trends have been heavily influenced by a period of recession. Due to the issues inherent within the household projections the PPG, paragraph 2a-015, is clear that they are only a starting point and other factors must be considered. This should be clearly stated within the report.

Housing

The data presented is an important source of information which will help shape housing policies. There are, however, numerous other data sets which should be considered. These include the number of concealed households, second homes and the size and type of property provided across Greater Manchester.

In addition, as noted above, the 2012 based household projections should be put into context, they do not represent the OAHN of Greater Manchester and should not be presented as such. The reference to the future housing requirement across Greater Manchester being 9,200 dwellings per annum should be deleted.

Economy / Employment

The Economy section, unlike the preceding housing section does not provide any commentary upon future economic forecasts. For consistency it is recommended that either both sections include forecasts, with the relevant caveats, or neither provide a forecast.

An issue which is often overlooked in terms of employment and the economy is the wider role which housing has to play. The HBF has recently undertaken a study upon the economic impact of house building entitled '*The economic footprint of UK house building*' this report can be accessed via our website at

www.hbf.co.uk. This report has been supplemented by a regional report for the North West which highlights the benefits provided to individual local authorities over the last year. It is recommended that the outputs from this and other similar studies are considered.

Are there any additional relevant plans or programmes that the IA should take into account?

The plans and programmes identified within the scoping report are all considered relevant to the IA. These plans and programmes largely relate to environmental and social issues. To ensure better integration of social, environmental and economic considerations into the preparation of the GMSF and to provide balance the HBF recommend that the following plans and programmes are also taken into account;

National

The Plan for Growth and supporting Ministerial Statement (2011) - Sets out the Government's plan to put the UK on a path to sustainable, long term economic growth. This goal is underpinned by the policy objective of achieving strong, sustainable and balanced growth that is more evenly shared across the country and between industries.

The Northern Powerhouse: One Agenda, One Economy, One North (2015) – the aim of the Northern Powerhouse is to transform Northern growth, rebalance the country's economy and establish the North as a global powerhouse. The 'One Agenda, One Economy, One North' strategy sets out how transport is a fundamental part of achieving the goals of creating the Northern Powerhouse and how to develop the long-term investment programmes needed. Rebalancing the national economy is a core part of Government's economic strategy, and an agreed priority with city leaders across the North. The importance of Greater Manchester to the Northern Powerhouse was highlighted in the recent budget announcements. It is therefore essential that the IA considers the implications of this important strategy.

Planning Practice Guidance (PPG) – the HBF is pleased to note that the IA assessment of plans, programmes and strategies includes the NPPF. Whilst the NPPF represents the primary source of national planning policy it is important that the IA also considers how the Government intends these policies be implemented and interpreted. The PPG provides this guidance, covering key issues such as plan preparation, undertaking an objective assessment of housing and employment needs, assessing development viability and flood risk assessment.

Emerging Government Housing Strategies – The Government is keen to boost the supply of housing nationally and has identified this as a key priority. To enable this growth to occur Government is bringing forward a number of schemes and initiatives with the aim of increasing the delivery of new housing. Schemes such as the Starter Homes Initiative, Housing Zones and Builders

Finance Fund are all clear indicators of the Government's desire to invest in and increase housing delivery and will have implications for the GMSF.

Regional

Greater Manchester Growth Deal (2014) – this agreement between Government and the Greater Manchester LEP sets out a number of key proposals including transport investment, public sector reform and growth industries.

Manchester Independent Economic Review (2011) – The review sought to identify how Greater Manchester could achieve long-term economic growth. It provided a clear assessment of the Greater Manchester Economy and identified opportunities to enable sustainable growth to occur.

Other Regional Documents – the IA should be regularly updated with emerging documents within the region, particularly those emanating from the LEP.

Information

I would be pleased if I could be kept informed of future consultation upon this document and the GMSF. I am happy to discuss further any of the comments made within this representation. The HBF would also be pleased to facilitate further engagement with the house building industry in the development of the GMSF.

Yours sincerely,

MJ Good

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