

SENT BY EMAIL
LDF@Gateshead.gov.uk
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Dear Planning Policy Team,

GATESHEAD LOCAL PLAN: START THE CONVERSATION

1. Thank you for consulting with the Home Builders Federation (HBF) on the Start of the Conversation – Gateshead Plan 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 is keen to continue to work with the Council in order to achieve an adopted local plan which enables the delivery of homes across Gateshead. The following comments addresses some of the questions, issues, options and recommendations provided in the consultation document with potential implications for the homebuilding industry.

Plan period

4. The new local plan will look forward to 2045 replacing the existing plan the Core Strategy and Urban Core Plan (CSUCP) which was adopted in 2015. The HBF considers that this period is likely to be appropriate, 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.

Question 1: Looking to the future for Gateshead, what do you think should be the top three areas we focus on over the next 20 years?

5. The HBF considers that one of the top three areas of focus should be housing, it will be important that the Council focus of the provision of homes as part of the delivery of the overall plan for the area. This is likely to include ensuring sufficient provision to meet local needs and to ensure a range and choice of provision across all parts of the housing market.

¹ NPPF December 2023 Paragraph 22



Question 2: What level of population and development do you think we should plan for?

6. The HBF considers that the Council should plan for ambitious growth, this would be in line with the NPPF² which states that Plans should be prepared positively, in a way that is aspirational but deliverable. The HBF agrees with the Council that there is an important link between population, housing and economic performance and that the right housing and employment offer is essential to attracting and retaining a skills base and the working age population, and in attracting inward investment. The HBF does not consider that it would be sound or appropriate to plan for a decline or stabilisation of the population or development in Gateshead, this would not be in line with NPPF or Government aspirations.

Question 3: Where would you like to see new development in Gateshead over the next 20 years?

7. The HBF considers that the Council will need to consider an appropriate balance of development, to ensure that all of their housing needs are met in terms of types and tenures; locations and markets, and to ensure that the Plan can deliver against its housing requirements. The HBF does not consider that the Council can continue to rely solely on the delivery of homes from the Urban Core and the MetroGreen areas, and that the Council needs to ensure that it provides homes across the whole of the area in order to meet the housing requirement.

Issue 1: How do we ensure that the Urban Core is a successful and adaptable place to live, work and visit?

8. The HBF agrees that it would be beneficial to continue to improve the environment of the Urban Core to make it a more attractive and pleasant place to live, work, visit and move around in.
9. The HBF would also agree with the Council supporting the delivery of homes within the Urban Core, as part of the Council's strategy to delivering their housing requirement. However, it will be important for the Council to ensure that the sites are deliverable and viable and can be brought forward within the Plan period.
10. The HBF agrees that the MetroGreen should be a successful and adaptable place to live, work and visit, and that this could be achieved through creating a new sustainable community supported by a reinvigorated MetroCentre. Again, it will be important for the Council to ensure that these sites are deliverable and viable and can be brought forward within the Plan period.
11. The HBF also considers that it will be important for the Council to consider the opportunities for development across the area including within the built up areas, on the edge of the built up area and outside of the built up area. To ensure that it provides an appropriate mix of housing to meet all of the housing needs.

² NPPF 2023 Paragraph 16

Theme 1: Creating healthy and inclusive communities

Issue 3: How should we ensure new development promotes health and well-being?

12. The Council are recommending that new developments will set out how health and well-being are affected by the development and consider measures to improve health and well-being, and to reduce inequalities. The Council are also considering the implementation of a policy requiring Health Impact Assessments (HIA).
13. The HBF generally supports plans that set out how the Council will achieve improvements in health and well-being. In preparing its Local Plan the Council should normally consider the health impacts with regard to the level and location of development. Collectively the policies in the plan should ensure health benefits and limit any negative impacts and as such any development that is in accordance with that plan should already be contributing positively to the overall healthy objectives of that area.
14. The PPG³ sets out that HIAs are '*a useful tool to use where there are expected to be significant impacts*' but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Consequently, where a development is in line with policies in the local plan a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring a HIA. In addition, the HBF considers that any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed and only where it is likely to have a significant impact upon the health and well-being of the local population.

Issue 5: How do we create a beautiful and well-designed Gateshead?

15. The Council propose to prepare a Design Code to sit alongside the Local Plan. The HBF would strongly recommend that the Council seek to work closely with the homebuilding industry in preparing their Design Code to ensure that the Code is realistic and deliverable.

Theme 2: Tackling climate change and enhancing the environment

16. The Council are proposing to require all major developments to explore opportunities for low carbon, local heat and energy solutions rather than the standard connection to the national grid. 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

³ PPG ID:53-005-20190722

Statement of December 2023⁴. The Council will also be aware that the Future Homes and Buildings Standards: 2023 consultation⁵ has been released covering Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating).

17. The Council are proposing to require a Carbon Impact Statement to be submitted in support of new development, setting out how it will reduce carbon emissions during construction and following completion. The HBF considers that any requirement for a Carbon Impact Statement should be proportionate to the scale of development and would question the need for it to cover the period following completion as this would not be in the control of the developer.
18. The Council are also proposing that where a development can't be carbon neutral that they will allow for the payment of a financial contribution in order to make carbon savings elsewhere. The HBF is concerned as to how this policy would work and how a financial contribution would be calculated, taking into consideration the decarbonisation of the grid. The Council will also need to consider the viability of the proposals in this policy to ensure that they do limit the deliverability of sites in the area.

Issue 8: How can we create flood resilient places?

19. The Council recommends avoiding new developments in locations with the highest risk of flooding. The HBF considers that this should be undertaken in line with the NPPF⁶ which states that all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change. The NPPF also sets out where it is not possible for development to be located in areas with lower risk of flooding the exceptions test may have to be applied.
20. The Council recommends ensuring that new developments are designed with mitigation measures to be flood resilient over its lifetime and that new properties benefit from Sustainable Drainage Systems (SuDs), such as water butts, green roofs and permeable paving. The HBF considers that a policy in relation to SuDs is not necessary as the NPPF⁷ already states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

Issue 9: How can we achieve biodiversity recovery and net gain?

21. The Council sets out that in line with new Government policy they would require most new development to achieve a minimum of 10% net gain in biodiversity. The Council sets out that they will produce a Local Nature Recovery Strategy, which will map ecological assets, set conservation principles, identify opportunities for habitat creation, restoration and enhancement, and to set measures for the recovery of species population. The Council will need to ensure that any policy in relation to biodiversity net

⁴ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/HCWS123>

⁵ <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

⁶ NPPF 2023 Paragraph 167

⁷ NPPF 2023 paragraph 175

gain is in line with the Environment Act and the emerging guidance. The HBF also recommends that any policy or text in relation to the LNRS should set out how the Council intends to manage the interaction between LNRS, the planning system, and the implementation of BNG.

Issue 10: Providing multi-functional green infrastructure

22. The Council suggest that they could introduce an urban greening policy, they suggest that urban greening is about making public spaces, streets and buildings greener. The HBF considers that at this stage it is not possible to determine whether this policy would be agreeable or not, this would depend on what the urban greening policy entails and what it may require of home builders.

Theme 4: Meeting our housing needs

Issue 15: How should we plan for affordable housing?

23. The Council are recommending continuing with the current approach, requiring a specific percentage of homes on major developments to be affordable. The current plan requires 15% of homes provided on developments of 15 or more properties to be affordable housing.
24. The HBF considers that it is appropriate for the Council to plan for the affordable needs of its community, and to ensure that it does this in line with the requirements in the NPPF⁸. This should ensure that any affordable housing requirements are clearly set out, are evidenced as viable through an assessment, and that flexibility is provided within the policy where viability may be an issue. The Council should also ensure that they have included an appropriate provision for both affordable home ownership and First Homes.

Issue 16: How should we plan for people with specific housing needs?

25. The Council recommends reviewing the forthcoming Local Housing Needs Assessment (LHNA) and the Specialist and Supported Accommodation Needs Strategy, and then, if necessary, amend the current policy approach to housing for people with specific needs. The HBF is generally supportive of providing homes that are suitable to meet specific housing needs. The HBF agrees that reviewing the evidence including the LHNA and the Viability Assessment would be a good starting point to determine if it is necessary to amend the current policy approach in relation to housing for people with specific needs.
26. Policy MSGP10 currently states that on housing developments of 15 or more dwellings 25% of dwellings will be constructed to meet the M4(2) standard. The HBF would just highlight that if the Council wishes to amend this policy in relation to the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. The PPG⁹ identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future

⁸ NPPF 2023 paragraphs 34, 63-66

⁹ ID: 56-007-20150327

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.

27. The Council should also note that the Government response to the Raising accessibility standards for new homes¹⁰ states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.

Issue 17: Should the Local Plan set requirements for housing density?

28. The Council have asked if they should set minimum density standards for housing developments, whether some urban areas should be required to deliver higher density development or continue with the current approach where there is no minimum density standard for housing development.
29. The setting of residential density standards should be undertaken in accordance with the NPPF¹¹ where policies should be set to optimise the use of land, this may include some urban areas delivering higher density development. However, the HBF considers that the Council will need to ensure that there is appropriate flexibility built into any density policy to allow developers to react to site-specific issues, and to take account of the evidence in relation to market aspirations, deliverability, viability and accessibility.
30. The Council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency, street trees, parking provision and EV charging, and any implications of design coding will all impact upon the density which can be delivered upon a site.

Theme 5: Connecting homes and places

Issue 18: How do we create neighbourhoods where people make walking and cycling the first choice for local trips?

31. The Council propose to ensure that new housing developments have networks of segregated paths and cycle paths, to prioritise pedestrians and cyclists through raising the standards of design for new development to provide pedestrian and cycle facilities throughout and to reduce the impact of through traffic in residential areas. The HBF generally supports the principal of active travel, however, the HBF would suggest that

¹⁰ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

¹¹ NPPF 2023 Paragraph 128

the Council take a flexible approach to how that is undertaken within housing developments.

Issue 19: How do we support active and sustainable travel for longer trips?

32. The Council propose to ensure new development has connections to existing cycling and walking networks and has an acceptable walking distance of public transport services, which offer a range of destinations. It also suggests that it would support development in areas with good cycle connections and good public transport accessibility or which could be improved through development. The HBF generally supports the use of sustainable travel, but would again suggest that the Council takes a flexible approach to how that is delivered.

Viability

33. 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, and that the total cumulative costs of all relevant policies will not undermine deliverability of the Plan. The Council need to ensure that policy requirements should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned development to be deliverable without need for further viability assessment at the decision-making stage.

Future Engagement

34. 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.
35. 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,



Joanne Harding
Planning Manager – Local Plan (North)

Email: joanne.harding@hbf.co.uk

Phone: 07972 774 229