

Planning Policy Team

SENT BY EMAIL Idf@gateshead.gov.uk 17/09/2020

Dear Sir / Madam,

# GATESHEAD MAKING SPACES FOR GROWING PLACES (MSGP): MAIN MODIFICATIONS

Thank you for consulting with the Home Builders Federation (HBF) on the Gateshead Local Plan, Making Spaces for Growing Places Main Modifications document.

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 multinational 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.

## **MSGP10 Housing Sites Allocation**

The Council propose to amend this policy to state that 'provision is made for approximately 2,789 homes over the plan period, specified in Appendix 2'.

The HBF do not consider that this policy is sound. It is not clear how this figure relates to the overall housing requirement for the Local Plan, or how it will contribute to the provision and maintenance of a five-year housing land supply.

The HBF continue to consider that it would be preferable for the allocations to actually be in the policy rather than as an appendix. This would be considered to in line with paragraph 16d which states that plans should contain policies that are clearly written and unambiguous.

# **MSGP11 Accessible and Adaptable Dwellings**

The HBF remain concerned that the need for the introduction of the M4(2) standard has not been sufficiently evidenced and consider that the policy should be deleted.

However, if the policy is to be retained, it is noted that the Council propose to amend paragraph 5.3 to include reference to circumstances where the requirements of policy MSGP11 will not be applied. This acknowledgement is generally supported, however, the HBF consider that it should be contained within the policy itself, rather than the supporting text.

#### **MSGP13 Housing Space Standards**

The HBF remain concerned that the need for the introduction of the NDSS has not been sufficiently evidenced and consider that the policy should be deleted.

However, if the policy is to be retained, it is noted that the Council propose to amend paragraph 5.8 to include reference to not applying the requirement for NDSS retrospectively to applications for reserved matters where the outline permission was determined or is subject to a resolution to grant permission before the end of the transition period, this is generally supported.

## **MSGP14** Housing density

The Council propose to delete Policy MSGP14 which related to housing density. The HBF generally support this deletion.

# **MSGP25 Design Quality**

The Council propose to delete part (f) in relation to living roofs and walls. The HBF support this deletion.

## **Future Engagement**

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.

The HBF would like to be kept informed of the adoption of the Local Plan and all forthcoming consultations upon associated documents. Please use the contact details provided below for future correspondence.

Yours faithfully,

**Joanne Harding** 

Mading

Local Plans Manager – North

Email: joanne.harding@hbf.co.uk

Phone: 07972 774 229