

SENT BY EMAIL
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04/03/2024

Dear Planning Policy Team,

NEWCASTLE LOCAL PLAN 2024 TO 2045: EARLY CONSULTATION REPORT

1. Thank you for consulting with the Home Builders Federation (HBF) on the Newcastle Plan the Future of our City 2024 to 2045 – Early Consultation Report.
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. We would like to submit the following comments upon the Early Consultation document and its ambitions. These responses are provided in order to assist the Council in the preparation of a sound plan, the HBF is keen to ensure that the Council produces a sound local plan which provides for the housing needs of the area.

Ambition 1: To support reduction of social and health inequalities ensuring the city becomes fairer, more economically inclusive, and healthier.

4. The Council states that the Plan will have health and inclusivity at its core. Proposals to ensure this, include: good design and placemaking; access to open space, nature and biodiversity, creating healthier food environments; good access to local services and facilities; and the provision of affordable and good quality housing.
5. The HBF supports the Council in looking to provide affordable and good quality 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.
6. The HBF considers that the provision of communal food growing opportunities as part of new development may require more thought. The HBF considers that the allocation of sites for allotments or community food growing, may be appropriate as part of the Plan, this allows those who are interest in food growth to do so, without burdening an entire new development with this asset which may not be wanted or used in an appropriate manner and may actually detract from a development. The HBF is also concerned in



relation to the implications of this policy in terms of viability, efficient use of land and site layouts.

7. The Council also suggests that the Newcastle Plan will also consider the use of Health Impact Assessments (HIA) and suggests that they could be used for major developments including residential schemes for 100 dwellings or more.
8. 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.
9. The PPG¹ 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. The requirement for HIA for development proposals of 100 dwellings or more without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.

Ambition 2: To support the city's ambition to be net zero and to mitigate the and adapt to climate change.

10. The Council suggest that the Newcastle Plan will address climate change by contributing to reducing the effects of climate change and adapting to climate change. It suggests that the Plan plays a key role in mitigating and adapting to climate change through: delivering sustainable development through distribution and density and reducing the need to travel; supporting the reduction of carbon emissions; promoting greater energy efficiency and the use of renewable energy; creating and expanding low carbon district energy networks; supporting the reduction of waste and pollution; improving the city's resilience to climate impacts; maximising sustainable and active travel; promoting healthy communities; and protecting ecology and securing biodiversity gains.
11. The HBF supports the Council in seeking to meet the challenge of mitigating and adapting to the effects of climate change. The HBF considers that the Council should ensure that any policy is only implemented in line with the December 2023 Written

¹ PPG ID:53-005-20190722

Ministerial Statement² which states that 'a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes'. It goes on to state that 'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale'. The HBF considers as such it would be appropriate to make reference to the Future Homes Standard and the Building Regulations as the appropriate standards for development. The Council will also be aware that the Future Homes and Buildings Standards: 2023 consultation³ has been released covering Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating).

12. The HBF generally supports the principal of active travel, however, the HBF would suggest that the Council take a flexible approach to how that is undertaken within housing developments.

Ambition 7: To deliver homes people need throughout their lifetime in sustainable communities where people want to live

13. The Council state that the local planning policies must identify and maintain sufficient land to meet housing needs over a short to long term period. It states that specifically the Newcastle Plan will need to plan for the right type of housing to meet their diverse and growing needs; provide affordable housing; be informed by local housing needs evidence; consider implications of climate change and provide for modern standards.
14. The NPPF⁴ states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method set out in the PPG. The PPG sets out the method for calculating the minimum annual local housing need figure⁵, this includes setting the baseline; making an adjustment to take account of affordability; capping the level of any increase; and the case of Newcastle this would include the cities and urban centres 35% uplift. The HBF would also expect the Council to investigate the circumstances where it might be appropriate to plan for a higher housing need figure as set out in the PPG⁶, these circumstances include where there are growth strategies for the area, where there are

² <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

³ <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

⁴ NPPF Dec 2023 Paragraph 61

⁵ PPG ID:2a-004-20201216

⁶ PPG ID: 2a-010-20201216

strategic infrastructure improvements, where an authority is taking unmet need from a neighbouring authority, and where previous levels of housing delivery, or previous assessments of need are significantly greater than the outcome from the standard method.

15. 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 NPPF⁷. 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.

Ambition 8: To deliver well-design and safe places that communities can help to shape and be proud of.

16. The Council suggests that a Design Code will need to be prepared which will encourage new high quality, well design and sustainable buildings. It also suggests that the Plan will need to meet climate change targets, to work towards all new buildings being carbon neutral. Along with the need to optimise the use of brownfield sites and consider maximising building densities in parts of city.
17. 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.
18. The setting of residential density standards should be undertaken in accordance with the NPPF⁸ 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 they take into account any other policy requirements in the Plan which may impact density and ensure there is appropriate flexibility built into any 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.

Viability

19. 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.

Monitoring

⁷ NPPF 2023 paragraphs 34, 63-66

⁸ NPPF 2023 Paragraph 128

20. The HBF recommends that the Council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provide more details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.

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,



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