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Dear Sir/Madam,

NEWCASTLE GATESHEAD LOCAL PLAN – CONSULTATION ON DRAFT HELAA METHODOLOGY

1. As part of the ongoing preparation of the Newcastle Gateshead Local Plan, Newcastle City Council and Gateshead Council (the Councils) are seeking comments on the methodology for their emerging joint Housing and Economic Land Availability Assessment (HELAA).
2. The consultation runs until 19 December 2025 and whilst the HBF does not comment on specific sites, it would like the opportunity to comment on some of the overall approaches to site assessments contained in the Draft HELAA Methodology Document. These comments are made with references to the headings within the document.

Site Sizes/Thresholds

3. The Draft HELAA Methodology Document should ensure that it assesses sites of all sizes over a wide variety of locations in order to meet the needs of Newcastle and Gateshead.
4. The document correctly identifies that the National Planning Policy Framework (NPPF, 2024) requires that at least 10% of the Councils' housing requirements should be on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved (paragraph 73a).
5. However, the document then sets the minimum threshold for the HELAA at one hectare, which corresponds to the upper limit expressed in the NPPF. This means the opportunity to

allocate such sites will be greatly diminished. Allocating such sites is important to small and medium sized housebuilders so as to provide certainty that such land can come forward, which in turn helps them with funding their businesses. Such sites also have the advantage of being capable of being delivered early so as to assist the Councils' housing land supply positions.

6. For these reasons, the HBF considers that the site sizes/threshold should be lowered appropriately.

Identifying Sites

7. The Draft HELAA Methodology Document highlights that sites may be discounted from the HELAA because they are located in the Green Belt.
8. The HBF suggests that such sites are not simply 'discounted' and then not assessed further, rather they should be assessed in a similar manner to other HELAA sites. Sites in the Green Belt that are then assessed positively in all other respects should be noted as such but caveated with 'subject to further Green Belt Assessment'. This is because there is the likelihood that Green Belt release will be required for the Local Plan to meet its housing needs and therefore at that point, the Council will already have assessed those sites in the HELAA and will then simply need to examine the impact of the sites on the relevant purposes of the Green Belt.
9. A similar approach should also be made to sites which are currently subject to other allocations/designations (eg. employment land), given that these are allocations/designations in an existing development plan which the evidence base may then indicate are not suitable to be retained for the new Local Plan. It therefore makes little sense to discount, without further consideration, a potential allocation in a new Local Plan based on information from the current development plan (which now may be out of date).

Suitability

10. It is noted that the Councils have stated that they will use PlaceMaker software to help examine site suitability. The HBF generally supports the digitisation of the plan-making process but would seek assurances that any outputs are sense-checked and that sites will still be subject to professional planning judgment with regards to their suitability.
11. The Councils will then need to be sure there is sufficient transparency in how conclusions on suitability have been drawn.

Accessibility

12. The HBF considers that being able to identify potential future housing allocations in accessible locations is important in ensuring that a Local Plan is fundamentally sustainable.

13. In this case, whilst examining distances to bus stops and amenities is important, the HBF would be cautious about rigidly applying these distances in a simple 'pass/fail' manner. This is because the quality of the route is just as important as the distance. That is to say, people will generally walk/cycle/wheel further where the route is of good quality.
14. Distances should therefore be appropriately sense-checked with site visits. The Councils should also take into account potential for improved links to sites and that more rural areas (that still nevertheless need growth) may struggle to meet these distances, so may need to be assessed differently.

Developable Area and Site Densities

15. The Council will need to consider assumptions for developable areas and densities carefully. Where a developer has submitted its own information, this should inform site capacity. In other instances, when setting developable areas (namely gross to net ratios) the Council will need to take into account on-site policy and regulatory requirements which include:
 - Any requirements for M4(2) and M4(3) standards.
 - Any continued requirements for Nationally Described Space Standards (NDSS).
 - Provision of cycle and bin storage.
 - The mix of homes needed to be provided.
 - The availability of electric vehicle charging alongside parking.
 - The provision of tree-lined streets.
 - The requirements in relation to biodiversity net gain (BNG).
 - The need for open space (which often cannot be doubled up with BNG).
 - Changes to the Building Regulations requirements in relation to heating and energy and the Future Homes Standard.
16. Taking into account these factors, the HBF would observe that the current assumptions for gross to net ratios are overly optimistic and need further analysis. We would also caution against using existing densities in an area as an indication, as often older development will not have had to factor in the majority of the above requirements.

Achievability

17. With regards to achievability, the Councils correctly identify that viability is an important component. However, the HBF considers that it is not entirely clear on how the Councils are approaching this matter and whether they are expecting developers to submit viability assessments with their Call for Sites submissions, or whether the Council is going to assess each site in terms of viability.

18. If it is the latter, then this clearly needs to be a robust and transparent process and this, alongside any wider whole-plan viability work, should involve the HBF and its Members to ensure it reflects our understanding of the housing market.
19. The Councils will clearly need to avoid identifying sites for potential future housing allocations to then, at a later date, not be able to prove that such sites are viable. The HELAA work therefore needs to go hand in hand with viability work.

Windfall

20. The HBF agrees that the Planning Practice Guidance (PPG) allows for the inclusion of windfall, but this is subject to 'compelling evidence' being presented (Reference ID: 3-023-20190722). Nevertheless, the HBF would recommend that windfall should be used to provide additional flexibility in the supply, not form an integral part of it. The reason for this is that by its very nature, windfall is unpredictable and that overly relying on this can put at risk the delivery of the homes that are needed over the plan period. In line with our earlier comments, we would also recommend that both Councils identify smaller sites for potential future allocations through the HELAA (see paragraph 73a of the NPPF) and not purely leave this to windfall.
21. If windfall is to be used as part of the Councils' supply, it will need to be thoroughly evidenced through the HELAA and take into account that whilst historic windfall rates can be used to inform future windfall to some degree, that the adoption of a new up to date plan will likely see a fall in windfall as part of the overall housing supply, which is then only likely to pick up towards the end of the plan period. Upon adoption, windfall should also not be introduced sooner than year three in order to ensure there is no double counting with regards to existing planning permissions.

HELAA Panel

22. Taking into account the above points we have raised, we would suggest the use of a HELAA panel involving the HBF and its Members so that these assumptions and how these apply to sites can be discussed in more detail.
23. This will help ensure that the HELAA is suitably robust and reflects the most up to date market knowledge.

Future Engagement

24. The HBF trusts that its comments will be taken into account in the preparation of the joint HELAA and we remain keen to continue to engage with the Council through this process and ideally through the aforementioned HELAA Panel.

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

Yours sincerely,

Chris Martin

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