

Planning Policy

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16/11/2018

Dear Sir / Madam,

## **NEWCASTLE DEVELOPMENT AND ALLOCATIONS PLAN: PRE-SUBMISSION**

Thank you for consulting with the Home Builders Federation on the Newcastle Development and Allocations Plan Pre-Submission consultation.

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.

### **Policy DM5 - Housing Sites**

As set out previously, the HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period.

The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

### **Policy DM6 - Accessible and Adaptable Housing**

This policy requires new housing developments of 11 dwellings or more to provide 25% of all new homes to be built to M4(2) standards.

It is noted that the Addressing Housing Needs and Standards document quotes the Inspector's Report for the (CSUCP) in relation to meeting the needs of the forecast population and housing standards (CS11.2/3/4/5 &6), in which the Inspector concluded: *"There is widespread support for most other requirements of policy CS11. The clause **encouraging** the provision of Lifetime Homes and Wheelchair-Accessible Homes **strikes an appropriate strategic balance between highlighting this important need whilst not making it a specific requirement that could compromise viability**. A similar argument applies to the clause seeking increased*

*choice for the elderly: many different types of accommodation are required and it is not feasible to set specific targets in a strategic policy.” (para. 62).*

The Addressing Housing Needs and Standards document suggests that Policy DM6 will help to deliver Policy CS11(2) and (3). However, the HBF do not consider that Policy DM6 is in line with Policy CS11 which only seeks to encourage the provision of wheelchair accessible homes and increase the choice of suitable accommodation for the elderly population.

The document goes on to identify the ageing population within Newcastle, however, the HBF do not consider that of itself an ageing population is sufficient evidence to identify a need for M4(2) homes. This is not in line with the PPG (ID 56-07) which identifies the type of evidence required to introduce such a policy, including the likely future 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.

### **Policy DM7 - Space Standards**

This policy requires all new homes to meet the Nationally Described Space Standards.

The HBF have set out their concerns in their previous response and would again highlight that the PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
- **Viability** – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.

The Council presents its justification for needing space standards in its updated September 2018 document titled ‘Addressing Housing Needs and Standards’. However, in relation to the evidence of completions and whether they have met the NDSS the document refers back to the evidence in the SHMA (2017). This considered a two-year period and 1,544 cases it highlights that 41% of the new properties sampled meet the NDSS. The document suggests that the need for internal space standards is already a policy requirement in the CSUCP and that Policy DM7 will support the implementation of this policy (CS11). However, Policy CS11 only states that providing a range and choice of housing will be achieved by providing adequate space inside and outside of the home to meet the needs of

residents. The policy does not require this to be done through the introduction of the optional housing standards. Therefore, the HBF do not consider that the 'need' for Policy DM7 and the introduction of the NDSS has been demonstrated. It is also considered that just collating evidence of the size of dwellings completed does not in itself identify need. It would be expected that the evidence would include market indicators such as quality of life impacts or reduced sales in areas where the standards are not currently being met. There is no evidence provided that the size of the homes being completed are considered inappropriate by those purchasing them or that these homes are struggling to be sold in comparison to homes that do meet the standards. Evidence collected by the HBF suggests that housebuilders in the area do not have any issues with selling properties at less than the NDSS, with three-bed non-NDSS compliant homes often being the top selling properties on sites.

It is also noted that the report highlights the issue of overcrowding based on the number of rooms in a home, it is questioned whether the Council consider the introduction of the NDSS would alleviate this issue. Or whether it is more likely that the introduction of the standard could lead to people purchasing homes with a smaller number of bedrooms, but larger in size due to the NDSS and therefore have the potential to increase issues with overcrowding.

In relation to viability the Council has stated that the NDSS can be viably provided and would not undermine overall plan deliverability. However, as set out in the HBF response to the Viability Assessment, the HBF continue to have concerns around a number of the assumptions made with the Viability Report and consider that a more cautious approach should have been taken. Therefore, the HBF do not consider that given the evidence provided the NDSS is necessarily viable or that it would not undermine the overall plan deliverability. The HBF also note that a number of site typologies are not considered viable in the base scenario which included the use of the NDSS standard.

### **Policy DM36 - Telecommunications and Digital Infrastructure**

This policy requires all major development to demonstrate how it supplies digital infrastructure to access electronic communications networks. The HBF generally consider that digital infrastructure is an important part of integrated development within an area. However, the inclusion of digital infrastructure such as high-speed broadband and fibre is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers. Service providers are the only ones who can confirm access to infrastructure. Whilst, paragraph 112 of the NPPF (2018) establishes that local planning authorities should seek support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. The house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand.

The HBF consider that in seeking to provide broadband the Council should work proactively with digital infrastructure providers to extend provision and not rely on the development industry to provide for such infrastructure.

**Future Engagement**

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.

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,

A handwritten signature in black ink, appearing to read 'Joanne Harding', with a stylized flourish at the end.

**Joanne Harding**

**Local Plans Manager – North**

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