



# THE HOME BUILDERS FEDERATION

Freepost RSAE-SHKR-JCKS,  
North Tyneside Council,  
Planning Policy,  
Quadrant East (1st Floor Left),  
The Silverlink North,  
North Tyneside,  
NE27 0BY

Date: 11<sup>th</sup> June 2015

Email: [planning.policy@northtyneside.gov.uk](mailto:planning.policy@northtyneside.gov.uk)  
**Sent by Email only**

Dear Sir / Madam,

## **North Tyneside Draft Green Infrastructure Strategy Update 2015**

1. Thank you for consulting with the Home Builders Federation (HBF) on the North Tyneside Draft Green Infrastructure Strategy Update 2015.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. We would like to submit the following brief comments.
4. The HBF generally supports the provision of Green Infrastructure (GI) and recognises the benefits that such infrastructure can provide. The GI strategy update appears to provide a comprehensive review of GI assets and requirements across North Tyneside. The HBF does not have any comments upon the methodology or identified GI assets at this stage.
5. The strategy identifies a number of GI requirements and funding mechanisms. Whilst the HBF does not wish to specifically comment upon these it is important the requirements do not place undue burdens upon development. The associated costs to development of providing GI must be considered alongside other elements of infrastructure provision, such as affordable housing and highway infrastructure, and the cumulative impacts this may have upon the viability of development across North Tyneside. The HBF consider that the GI strategy should provide more detailed discussion upon the likely costs of implementing the strategy.

6. It is noted that the Council is currently undertaking work upon an Area Wide Viability Assessment. The viability assessment needs to take full account of the costs associated with the GI strategy and accompanying local plan policies. This is particularly pertinent given that the existing Affordable Housing Viability Assessment (2010) indicates viability issues within parts of the urban area without the inclusion of other new policy considerations. It may become apparent through the cumulative testing of such obligations that the Council will have to consider prioritising certain types of infrastructure over others to ensure that viability can be retained. This may be through lowering affordable housing contributions to enable GI infrastructure improvements to take place. The HBF recommends that the plan take a pragmatic approach to this and provide policies which reflect the Council's priorities whilst also ensuring development remains viable.
7. The GI strategy makes several references to the use of section 106 agreements for both on-site and off-site GI provision. The Council will be aware of the limitation of five pooled contributions, post 6<sup>th</sup> April 2010, for specific infrastructure types or projects as described by regulation 123 of the CIL Regulations 2010. If the Council wish to pool contributions this should most appropriately be done via the introduction of a CIL charging schedule.
8. I trust that the Council find the foregoing comments useful in the preparation of the GI strategy and Local Plan. The HBF would be happy to discuss these and other matters further if required. I would also like to be kept informed of other opportunities to comment upon elements of the Local Plan.

Yours sincerely,

*MJ Good*

**Matthew Good**  
**Planning Manager – Local Plans**  
Email: [matthew.good@hbf.co.uk](mailto:matthew.good@hbf.co.uk)  
Tel: 07972774229