

Neighbourhood Plan Steering Group
Newport Parish Council
Waterloo House
High Street
Newport
CB11 4ER

Date: 14 June 2018

Our ref: 15920/SSL/JLa/14729099v1

Your ref:

Dear Sir / Madam

Newport, Quendon & Rickling Neighbourhood Plan Consultation

Introduction

We write on behalf of our client, Taylor Wimpey, in relation to the Newport, Quendon & Rickling Neighbourhood Plan Consultation. Taylor Wimpey welcomes the progress to date on the emerging Plan and is grateful for the opportunity to comment on the proposals.

Taylor Wimpey is supportive of the general approach of the Plan and commends the Parishes on their work in consulting on and drafting the Plan. It is welcomed that the plan not only acknowledges the requirement for more homes but also includes housing allocations. In this regard, Taylor Wimpey has recently acquired a site within the Neighbourhood Plan area and is keen to engage with the Steering Group, Parishes and wider community to see how they could work with you in taking matters forward.

Taylor Wimpey

Taylor Wimpey has recently acquired an interest in the land to the east of Newport, to the south of Debden Road (please see the appended site plan).

Taylor Wimpey is a national homebuilder operating from 24 regional offices across England, Scotland and Wales. Taylor Wimpey's regional offices have a strong local focus and have a good track record of delivering new homes within the District.

They are committed to adopting sustainable practices to provide places to live with appropriate facilities, an attractive environment and a sense of place.

Moreover, they seek to add social, economic and environmental value to the wider communities in which they operate. This includes working with local people, community groups and local authorities and keeping them informed about works, both before construction and throughout the life of the development. Getting the basics of homebuilding right first time, such as quality, customer service and health and safety are key priorities for them.

Land East of Newport

Development of the Taylor Wimpey land to the east of Newport offers the opportunity to realise some of the objectives of the Plan and would also enable the Chalk Pit allocation, which is currently isolated from

Newport, to be better connected with the town centre and station. This could include facilitating links and significantly improving access to the station and businesses on High Street.

It is also considered that new development of the Taylor Wimpey site is within easy walking distance of the town centre and could be beneficial to the vitality of businesses in Newport. Development could also assist, either through onsite provision or section 106 planning obligations, with some of the recreation and other infrastructure requirements identified in the draft plan.

Taylor Wimpey would therefore welcome the opportunity to discuss development aspirations at the site further with the Neighbourhood Plan steering group to consider how its development could contribute to some of the objectives identified in the plan such as improved infrastructure, recreation facilities and support for local businesses.

In addition, Taylor Wimpey currently have the following comments on the draft Plan.

Comments on the Draft Policies

Policy HA2 – Balancing development

Taylor Wimpey support the concept of balancing development. The land to the east of Newport is close to the station and the High Street and could deliver sustainable development. However, it is considered that this policy should not just be restricted to brownfield land, as other sites have potential to provide sustainable development which could contribute to the vitality of local businesses and contribute to infrastructure improvements.

Uttlesford has very limited brownfield land suitable for residential development and so, as the Council acknowledge, some development will need to be accommodated on greenfield sites in order to meet the identified housing requirement for the District.

Policy HA3 – Connection with the countryside

We support the aim to maintain a visual connection with the countryside. However, it is not considered that this should rule out all new development as the landscape impact will depend upon the location and design of any development. Consideration of this is a matter for detailed design.

It is noted that Neighbourhood Plans must not constrain the delivery of important national policy objectives (National Planning Practice Guidance, Reference ID: 41-069). Delivering a step change in housing delivery is a key element of the NPPF and the recently consulted on draft NPPF supports making optimal use of sites well served by public transport (draft para. 123). Given that Uttlesford has very limited brownfield land suitable for residential development the prevention of development on greenfield sites that are close to the railway station and local businesses should be reconsidered. The aim of the policy – ensuring a connection with the countryside – could be met by amending the policy so that it does not preclude housing development and remains compatible with the requirements of national policy.

It is suggested the policy is *amended* as follows:

“To retain the close connection with, and views of, open countryside:

- *Proposed development must be sensitive to the setting of Newport within the surrounding countryside. The design and layout of any new development must take into account existing views into the countryside and ensure that the visual connection to the countryside is not lost.*

~~will not be permitted up the valley side on the east of the railway at Newport and on the fields separating the developed area to the south of Wicken Rd from the newly developed area to the north of Bury Water Lane”~~

The amended wording sets out the aim of the policy clearly but would not preclude the possibility that detailed design and carefully considered landscaping could ensure that development retains the connection with the countryside.

Policy HD2 – Housing Design

The general aims of the policy are supported. However, the density restrictions are unnecessary and may prevent the most efficient use of land. In particular, such requirements may not be compatible with the smaller homes sought in policy HD4. While density is an important consideration, it is also interrelated to other aspects of design. The 20 dph threshold may be appropriate in some circumstances, but it is overly prescriptive to include it as a policy as it would preclude the type of detailed design review which criteria a – e of the policy require. It is suggested that if the housing design meets the requirements of policies a – e, the density of development would be appropriate.

Furthermore, the policy is contrary to Policy H1 (Housing Density) of the draft Uttlesford Local Plan which proposes a range of 30-50dph for any development adjacent to a settlement. The NPPG (Reference ID: 41-009) advises that consistency between Local Plans and Neighbourhood Plans which are being prepared at the same time is important, particularly in relation to housing need. Placing a cap, which is significantly lower than that contained in the Local Plan, on development would lead to inefficiently utilised land which would be contrary to the Government's ambition to make optimal use of sites well served by public transport (draft para. 123).

The part of the policy on density should be deleted, as it is unnecessary in addition to the other requirements of the policy and is inconsistent with the emerging Local Plan and national policy.

Policy HD4 – House Sizes

We support the requirement for a range of house sizes. However, the requirement for a specific portion of one bed homes is not consistent with the emerging Local Plan and given such dwellings would likely be provided as flats this requirement would not be compatible with the proposed 20dph threshold within Policy HD2.

Draft Policy H2 of the emerging Plan prioritises the delivery of 3 and 4+ bedroom market housing and 2 and 3 bed affordable housing. Appendix 2 then sets out monitoring targets for the delivery of housing, based upon the 2015 SHMA, as follows:

Flats 1 bed – 4% Flats

2 bed – 3% Houses 2

bed – 12% Houses 3

bed – 43% Houses 4+

bed – 38%

The requirement for 10% 1 bedroom housing is therefore inconsistent with the emerging plan. The NPPG states that

“Although a draft neighbourhood plan or Order is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.” (ref. Policy HD6 - Reference ID: 41-009)

The proposed 10% 1 bedroom dwelling requirement is inconsistent with the emerging local plan and its evidence base and does not meet the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.

Policy EH2 – Primary school places

We recognise the importance of ensuring available primary school capacity on the area. The required contributions to education infrastructure are currently determined at the planning application stage in accordance with Essex Country Council (the authority responsible for education) formulas and then secured via section 106 planning obligations. This approach ensures that financial obligations are secured and dates of payment specified. Changing this up-front approach to a prior to occupation approach, which is much later in the development process, could result in much needed homes being left empty due to circumstances outside of a developers' control as the provision of school places is the responsibility of ECC. The NPPF (para. 72) makes clear that widening the choice of education is the responsibility of the Local Authority.

The requirement for such pre-occupation conditions would place an unacceptable burden on developers, threatening the viability of new housing and preventing the sale of new homes until a situation outside of their control had been addressed by ECC. Given that the S.106 contributions towards the creation of new school places are paid for by the sale of homes the effect of this policy could be to delay the availability of new homes and improvements to local schools. Policy EH2 is not consistent with national policy as it would be an unacceptable burden on development, threatening viability. The policy, as currently worded, does not meet the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as it does not have regard to national policy on viability (NPPF para. 173) and education provision (para. 72). Furthermore, it would place in jeopardy the ability of the district to meet its urgent housing need.

Conclusion

Taylor Wimpey welcome the opportunity to comment on the Newport Quendon & Rickling Neighbourhood Plan and having recently acquired an interest in the land to the east of Newport are keen to continue to engage with the Steering Group, Parishes and wider community.

The land in their control could assist with reducing the isolation of the Chalk Pit allocation by providing linkages through to the businesses on High Street and the railway station. Development of the site could also help to deliver some of the improvements to local facilities and infrastructure sought in the plan and boost the local economy.

Should you wish to discuss the site further or anything within these representations further please do not hesitate to contact me or my colleague Simon Slatford.

Yours faithfully



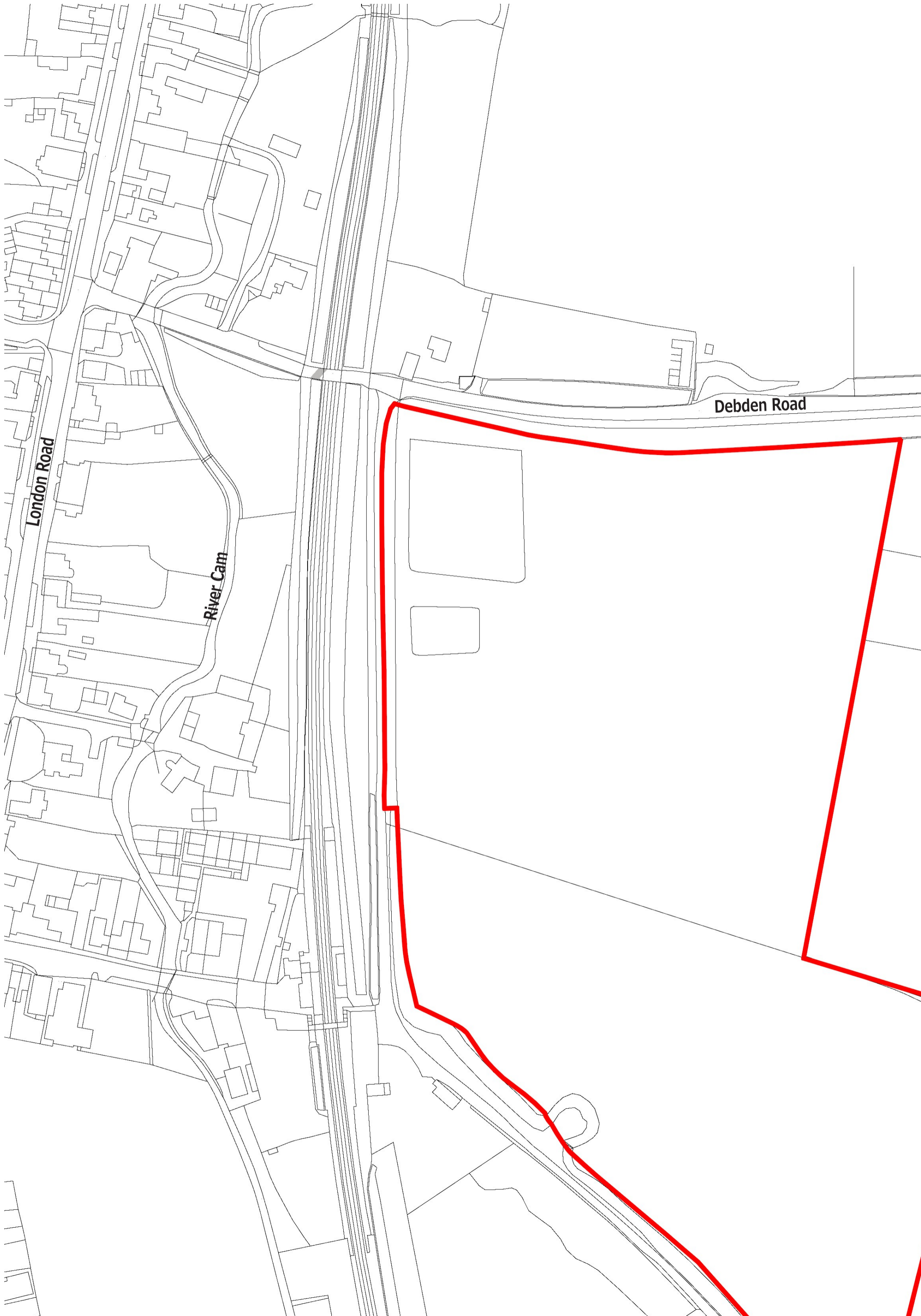
Joe Larner
Senior Planner

Enc. Site Plan



Steering group comments:

As this site was not in the 2015 Call for sites it was not considered in our Plan site review. A meeting between Taylor Wimpey and Newport parish council is scheduled for 19th September 2018. Matters from that will be reviewed by the parish council and the Steering Group. Comments on individual policies are noted and where appropriate will be incorporated in the next iteration of the Plan



London Road

River Cam

Debden Road