

Laura Gardner
Newark and Sherwood District Council
Castle House
Great North Road
Newark
Notts
NG24 1BY

Dear Laura,

Planning Committee - Late Item Response - Residential development of 103 dwellings and associated access and infrastructure at Eakring Road, Bilsthorpe (App Ref No. 20/00873/FULM)

Further to the recent issue of the Agenda Report and ahead of consideration of the Eakring Road application at the 03/11/2020 Planning Committee Meeting, I write on behalf of my client Keepmoat Homes East Midlands, in relation to a number of the discussion points detailed within the report. We would accordingly be grateful if this late item representation could be provided to Members for their consideration ahead of the meeting.

- **Introduction to Keepmoat Homes**

My client is very excited by the prospect of developing the residential site allocation at Eakring Road, Bilsthorpe, as it will be their first site within the Newark and Sherwood District. By way of introduction, Keepmoat are a top 10 homes-builder by volume and the East Midlands region currently operate with a 5* NHBC rating. As a developer they look to provide family market housing within an affordable price range, with a particular focus upon the first-time buyer market.

- **Scheme Viability**

Delivery of the scheme is quite challenging due to the range of abnormal costs and the limited development value anticipated overall. Accordingly, a viability case has been provided as part of the submission and this has been agreed by the Council's independent consultant. Notably, the viability appraisal demonstrated that the scheme could only deliver 4% affordable housing with no S106 contributions. Nevertheless, to ensure the scheme is delivered in a manner that is acceptable from an infrastructure perspective, my client has agreed to offer a 10% affordable provision and an overall contribution of £258K, at considerable risk to themselves.

- **Principle of Development**

The principle for residential development is clearly not in question due to the existing site allocation (for 75 dwellings) and the extant outline approval (for 85 dwellings). Notwithstanding this, my client is able to offer an overall quantum of 103 dwellings by means of an efficient site layout. The efficient use of land is supported by the NPPF (paragraph 122) but is also essential in this case to ensure that the scheme can be delivered viably.

- **Phasing Considerations**

The committee report references the overall mixed-use nature of the allocation and appears to call

into question whether the scheme is presented in a comprehensive manner.

From this regard it should be noted that a reserved matters application has been submitted for the delivery of the convenience store element (by the Co-op – app ref no. 20/01965/FUL). Both developments are proposed to sit side by side, as is reflected by the relevant site location plans, and both correspond to the mixed-use breakdown established by the existing outline approval.

Notably, the applicant's approach to submit a separate full application was only necessitated by the increase in residential numbers, otherwise a standard reserved matters application would have been sufficient. This approach and the uplift in numbers was confirmed as acceptable in principle by Officers at the formal preapplication stage.

Pertinently, the Co-op application includes a proposed access point via the initial section of spine road to be constructed by Keepmoat Homes, should their application be successful. In addition, the convenience store will utilise the drainage outfall, also to be provided by Keepmoat as part of their drainage scheme. Accordingly, the initial element of the residential scheme is required to come forward first to facilitate the delivery of the convenience store, thereby respecting the aspirations of the mixed-use policy and the phased, comprehensive delivery anticipated overall. Fundamentally, without the road and drainage infrastructure provided by the proposed Keepmoat scheme, the convenience store, as currently proposed, cannot be delivered.

It should also be noted that Policy Bi/MU/1, as worded, does not require the residential and retail elements of the outline scheme to be delivered by the same developer; at the same time; subject to an overall site masterplan or as part of a comprehensive piece of development. Nevertheless, the delivery of the site will ultimately be comprehensive and within the general phased approach established through the previous outline approval. Crucially, delivery of the overall allocation is being provided by just two developers, with the funding of each essentially mutually exclusive. In any event, the agreed viability position demonstrates that the residential development cannot fund delivery of the convenience store, other than the access and drainage infrastructure, nor should it need to given the demonstrated retail demand which informed the original allocation.

- **Housing Mix**

In the case of housing mix, Core Policy 3 outlines the housing need for the District for family housing of 3 bedrooms or more along with smaller houses of 2 bedrooms or less. The policy also qualifies that whether a given mix is appropriate depends on (a) local need, (b) local circumstances and (c) viability.

In this instance, the dwelling mix proposed clearly reflects the policy outline as a starting point but has factored in an assessment of the local market alongside the very tight viability underpinning overall delivery of the development. The predominance of three bed dwellings directly adheres to Policy whilst the necessity for the proportion of 4-beds reflects my client's own market assessment balanced within the viability context.

What appears to have been missed by officers' interpretation of the potential suitability of the mix delivery is in relation to the affordability of the Keepmoat Homes product. Keepmoat offer predominantly smaller, efficient family home choices, which is also reflected in the price they market their houses, a point picked up in the analysis the officer has detailed with respect to national space standards. Accordingly, the Keepmoat price for most of the three bedroom homes is comparable to the asking price for two bedroom units sought by the more aspirational volume developers building in Newark and Sherwood District at present such as Avant, David Wilson and Miller Homes. This approach ensures that family homes remain affordable within the general market context.

As an example of this, at the current Keepmoat site in Anstey, Leicestershire the starting price for a 3-bedroom home is circa 85% of the neighbouring Barwell Homes development. As a result, the relevant price points align with the general affordability of the area, especially with Help to Buy factored in, and in so doing brings the mortgage affordability of a 3-bedroom dwelling within the income range of those that would otherwise be limited to 2-bedroom homes.

Crucial to the mix is also the impact the current pandemic is having on market demand. With the shift to working from home, there is a growing need for more flexible spaces and additional rooms, and the corresponding demand for 3 to 4 bed properties has certainly reflected this since spring this year.

- **Highways Considerations**

My client has worked closely with Nottinghamshire County Council (NCC) Highways to establish a form of layout and scheme delivery that is acceptable, and it is important to note that there is no objection from NCC.

We note the points raised in the officer report in relation to use of triple tandem parking for some of the four-bedroom dwellings proposed. The officer objection hangs on the terms of the Council's August 2020 consultation draft "Residential Cycle and Car Parking Standards & Design Guide Supplementary Planning Document". "Key principle 2" in the draft SPD expresses a "*preference*" against tandem parking and says that it will "not normally be supported".

As officers have outlined, the consultation draft SPD carries very limited weight at this stage. In any event, and regardless of its weight, the SPD's terms only set out a "*preference*" against tandem parking which will "*not normally be supported*". The topic paper is more equivocal still as it refers to "*discouraging*" what is referred to as an "over reliance on tandem parking". It is therefore clear that even if the SPD were given full weight, there is no absolute objection to tandem parking and any assessment would need to be made on a case by case basis using professional technical judgment as to acceptability. In this instance, the Highway Authority has not objected to the scheme as it is entirely appropriate within context, especially given the viability considerations.

- **Archaeology**

By way of update in relation to archaeology, a Written Scheme of Investigation (WSI) report was submitted and approved by the County Archaeologist at the end of July. My client subsequently informed the District Council that works were to be undertaken in August. No findings were made, and the County Archaeologist was satisfied. The Evaluation Report was submitted in September to both the Case Officer and the County Archaeologist. Consequently, no conditions are necessary. The scheme is therefore compliant with the allocation policy as no further archaeological works are necessary prior to development.

- **Conclusion**

Ultimately, you have before you a very considered and sensitively designed residential scheme on an allocated site which will make a significant contribution to the District's housing delivery and in making family homes more affordable. It is entirely policy compliant and accordingly we would respectfully request that you support the officer recommendation with a resolution to grant planning approval.



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Should you have any queries in relation to the details listed however, please do not hesitate to contact me.

Kind regards

A handwritten signature in black ink, appearing to be 'CDwan', written over a horizontal line.

Chris Dwan
Director