



Rendlesham Parish Council

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Dear Sir

Planning Reference DC/19/3881/FUL

Rendlesham Parish Council Object to the application and are disappointed that the application has been submitted without any prior contact with Rendlesham Parish Council.

The Headlines reasons for Objection are as below, and stem from discussions at a public meeting on Nov 11th and are as noted on RPC website.

- The Rendlesham Neighbourhood Plan (RNPP1) clearly states that:

‘Proposals for redevelopment or change of use involving residential development will only be permitted where they maintain or enhance the existing or established employment, leisure, education, retail or community uses and future needs thereof.’ The proposal does not align with this requirement.

- Affordable Housing

Rendlesham has 2 housing site allocations in the Suffolk Coastal Local Plan, each expecting 50 homes and a minimum of 32 affordable homes. In the Housing Needs Survey undertaken in 2012 the survey identified a need for 20-30 affordable homes. There is no evidence to suggest that this number has increased. Therefore, the demand for affordable homes in Rendlesham will be met by the 2 allocated sites meaning this proposal as well as being non-compliant with the Neighbourhood plan is not needed.

It is vitally important for Rendlesham that:

- The “Right Housing” is built in the “Right Place” with the “Right Infrastructure”. The proposed development does not meet this set of “rights”

93% of people responding to the Neighbourhood Plan supported the safeguarding of the District Centre (Village Centre) with the purpose of retaining and improving additional retail, leisure and community facilities.

Sustainability

The Suffolk Coastal Local Plan (para 4.68), states that 'A District Centre is a large group of shops anchored by a small supermarket, together with facilities, which collectively form a coherent area.' On that basis this application is not compliant with the Rendlesham Neighbourhood Plan District Centre designation or the Suffolk Coastal Local Plan, which lists Rendlesham as a District Centre.

Rendlesham is still a growing Community. A further 100 homes will be built bringing with it a substantial increase in population Rendlesham only has one village centre, the need for further education, community, retail and leisure facilities is the priority. This application does not provide a sustainable solution for the village of Rendlesham.

The Suffolk Coastal Local Plan SCLP4.12 states that 'District Centres provide shops and some other local services to meet the needs of residents in the local area'. This remains a priority for Rendlesham.

Trees

The application proposes the removal of 12 out of the 14 established healthy trees on the site. This is contrary to the Climate Emergency Declaration made by the Parish Council and both East Suffolk Council and Suffolk County Council.

Education

The new emerging Suffolk Coastal Local Plan states that:

'Rendlesham Primary School is operating close to capacity and, considering this allocation along with education forecasts, would be marginally over capacity during the first 5 years of the plan period.' (Para12.710). East Suffolk recognise that the 100 homes already allocated to be built will exasperate this issue further and therefore propose that a greater proportion of housing is designed to meet the needs of the elderly population or are smaller dwellings unless further education facilities can be located.

The plan further states that 'Farlingaye High School is currently operating over capacity with no immediate opportunities for expansion.'

The Rendlesham Neighbourhood Plan makes provision in the District Centre for additional education facilities. The Sports Centre site is directly opposite the primary school which would enable a natural expansion of the school in the future. The primary school is a social hub which, without further expansion plans will result in children in the village having to be bussed to Eyke and Melton, as has happened in the past. This disenfranchises families from the community.

Retail

Due to the lack of available retail space in the village centre, a number of retail outlets are located in Rendlesham Mews which has no footpath link from the village.

Costcutters, now under new management, has become an integral part of the community. The Post Office is sited within the shop. We believe this fulfils the definition outlined in the Suffolk Coastal Local Plan that a District Centre 'is a large group of shops anchored by a small supermarket'. The applicant has not demonstrated that there is a demand or need for a second food retail outlet.

Summary

The proposals outlined in the application:

- Are not policy compliant
- Seek a short term win for the developer
- Uses valuable land in the village centre for housing that immediately removes the potential for any further infrastructure on the site to create a thriving village centre for generations to come
- Do not address the proven need for additional primary school facilities
- Do not provide sufficient evidence that a second food retail outlet is needed

We submit below further points based on Material Considerations which underpin the above points:

Sustainability

NPPF (para 7) is clear on what constitutes sustainable development and it is important to consider this at the outset of this representation:

“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs#

Resolution 42/187 of the United Nations General Assembly.

Rendlesham Neighbourhood Plan

Rendlesham Neighbourhood Plan (RNP) was Made in March 2015 and was created in order to safeguard the heart of the village for future generations.

The RNP is clear on this at its paragraph 3.21:

“This RNP has been produced, not to stop development, but to ensure that the right development happens in the right place with the right infrastructure to support the aspirations of a growing community”.

Key to the understanding, interpretation and application of Policy RNPP1 is that it does not prevent housing from being approved in principle, otherwise it would not have passed through Examination and been Made. However, it does expect the evidenced needs of the community to be provided for first.

In addition, the Parish Council notes that in the Planning Statement at paragraph 2.47 the RNP policy RNPP1 is not represented in full, the crucial first paragraph is missing, and this would give the uninitiated reader a false impression of what the policy intends. That first crucial paragraph reads:

“In the Rendlesham District Centre (as defined in Fig 20) the emphasis will be on maintaining or enhancing those uses and services the community has identified”. *This indicates that the applicant has been “selective” in interpretation of RNPP1.*

Interaction with Emerging East Suffolk Local Plan

The emerging local plan on page 29 sets out the local planning authority’s ‘Ambitions for Growth’ and chief amongst them is the ambition to ‘support the vitality of district centres’. The Parish Council contend this is not achieved by seceding land to housing at a very early stage in the plan period.

The emerging local plan (paragraph 4.68), refers to ‘District and Local Centres’ & states that “a district centre is a large group of shops anchored by a small supermarket, together with facilities, which collectively form a coherent area”. It does not mention housing. It is the Parish Council’s contention that the predominance of housing in this application is not cohesive, but rather it erodes the district centre; something the neighbourhood plan was created to prevent.

The proposal as submitted therefore does not align with the Planning Authority's definition of the requirements of a District Centre

The Parish Council's Comments on the content of Planning Statement

The Planning Statement includes a section on Planning History. That section includes more recent items, only as far back as the previous failed attempt to blanket the district centre with housing. Two key items missing from the Planning History are the early Rendlesham Masterplan (discussed at length in the RNP) and the aspirations of the old saved local plan policies AP159 and AP160

Ap160 (a) which refers to "Creation of a Community"

Ap160(c) which refers to "Provision of new or improved infrastructure and social/community facilities

Ap160(d) which refers to "the creation of a Village Centre consisting of, at least, shops, recreation and facilities/services"

The Planning Statement includes reference to a suite of NPPF policies which, understandably, are provided to best defend the applicant's view, but omitted from that list, and strongly material to the circumstances, are the following

NPPF Ref 15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

NPPF Ref 16. Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;
 - b) be prepared positively, in a way that is aspirational but deliverable;
 - c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
 - d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
 - e) be accessible through the use of digital tools to assist public involvement and policy presentation;
- and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

NPPF Ref 18. Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies.

NPPF Ref 28. Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

NPPF Ref 29. Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.

NPPF Ref 30. Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.

Paragraph 2.20 of the Planning Statement states that the “predominant use would therefore be retail”. The Parish Council understands the need for the applicant to push this idea, after all acceptance of it implies compliance with the RNP.

However, it is the Parish Council’s firm opinion that the predominant land use is in fact clearly housing (Purple for residential land and blue for retail) see image below.



The Parish Council's Comments on Planning Statement relative to RNPP1

RNPP1 is the policy for determining planning applications in the Rendlesham District Centre, and the Planning Statement correctly refers to policy RNPP1.

The Planning Statement also references local plan policies SP9, SP19, SP27 and SSP30. These policies all relate to district centres.

It could be construed that there is a weight of expectation from those local plan policies which can or should somehow be balanced against policy RNPP1 and this would be wrong.

In this case the mere fact that RNPP1 exists, and that it does not conflict with those strategic policies, gives it precedence in the determination of planning application that relate to it. In other words, there was little to no need to refer to policies SP9, SP19, SP27 and SSP30 because RNPP1 is THE POLICY for determining planning applications in the Rendlesham District Centre.

As highlighted earlier, the Parish Council notes that in the Planning Statement at paragraph 2.47 the RNP policy RNPP1 is not represented in full, the crucial first paragraph is missing, and this would give the uninitiated reader a false impression of what the policy intends. That first crucial paragraph reads:

“In the Rendlesham District Centre (as defined in Fig 20) the emphasis will be on maintaining or enhancing those uses and services the community has identified”.

This is a further example of the applicant being “selective” in his interpretation of the RNP

Paragraphs 2.48 to 2.50 are predicated on a falsehood. Paragraph 2.48 starts by saying that “Policy RNPP1 is accompanied by a proposed masterplan...dated July 2016”. This is simply not the case.

- No ‘masterplan’ for the district centre forms any part of the Made neighbourhood plan.
- This reference is to an informal document which is not part of the development plan and is certainly not part of the neighbourhood plan.
- Reference to it and the developer's reliance on it are misplaced and decision makers should disregard it in their assessment

The submitted Planning Statement focusses on local plan policy rather than the Neighbourhood Plan; its policy RNPP1 and its supporting objectives and evidence. It also sets out clearly that it is a “deviation” from the Neighbourhood Plan policy.

There are two apparent truths in the Planning Statement:

- “The proposed retail use is supported by Policy RNPP1”.
- “It is appreciated that affordable housing deviates from the policy requirements of RNPP1”

This “deviation” from the Neighbourhood Plan is further compounded where the Planning Statement says:

- “the deviation from the Neighbourhood Plan policy RNPP1 is to provide a small-scale residential use [RPC note it does not say 'affordable housing'] in addition to the retail use is justified by the results of the marketing and viability appraisal [discussed separately] and the heavily constrained northern part of the site due to the presence of underground cables”

No explanation is given for the “justification” as to why only residential development can be built over the underground cables. Surely a non-residential community use would be more appropriate?

The proposal is therefore, by definition and the admission of the applicant's agent, in conflict with the Neighbourhood Plan. By extension this cannot therefore represent sustainable development in

this case, focussed as the neighbourhood plan is on “meeting the needs of the present without compromising the ability of future generations to meet their own needs”.(NPPF cl 4)

Parish Council’s Comments on the Marketing and Financial Viability Report

In respect of the submitted Marketing Report as part of this application the Parish Council notes the following:

In sections 2.4 ‘Description’ and 2.6 ‘Services’ the Parish Council note that the authors of the marketing report were not provided with any information on remediation services. This is important because the submitted Planning Statement states quite clearly that *“the deviation from the Neighbourhood Plan policy RNPP1 to provide a small-scale residential use in addition to the retail use is justified by the results of the marketing and viability appraisal and the heavily constrained part of the site due to the presence of underground cables”*.

RPC therefore presume that the discovery of the services was made the by the (now) owner as a part of the “Searches” process as part of the purchase of the land.

In section 2.12 of the submitted marketing report it references ‘Rendlesham parish council plans for district centre dated July 2016’.

Rendlesham Parish Council emphasise it is not a formal document and should not form the backbone of the marketing report in the critical manner that it is presented

The Parish Council note and confirm that the document referred to was in fact Confidential between RPC and our consultants. It had previously been shared in similar confidence in preliminary discussions with SCDC (as then was). Those discussions formed part of initial considerations and ideas to overcome the impasses with the previous owner following the rejection of the appeal associated with application ref C/12/2408.

RPC remain unclear how (and concerned that) this confidential document found its way into either the sales particulars of the site or has subsequently been supplied to the new owners.

In fact, with this section of the marketing report omitted, there is little in the way of substantial evidence in support of the proposal; reliant as the marketing report is on criticising an informal document from 2016.

The Parish Council’s Concluding Points

The Parish Council strongly object to this planning application because it is fundamentally not sustainable development. It does not meet the needs of the present and only serves to restrict the ability of Rendlesham to provide further infrastructure and services to current and future generations.

The future of the heart of the village is at stake and the Parish Council implores the local planning authority not to trade this away so soon in the plan period - other better proposals will come forward.

To reiterate the planning application as submitted does not comply with the neighbourhood plan or its core policy RNPP1.

The Planning Statement and Marketing Report are left wanting and no pre-application discussions were held with the Parish Council: the authors of the neighbourhood plan.

The local planning authority can rest assured that if they refuse this planning application, the Parish Council will play a central role in defending that decision, as they did when the village centre was last threatened by a poorly considered and short-termist development proposal.

Yours Sincerely

Michael A Stevenson
Chairman Rendlesham Parish Council