



Rendlesham Parish Council

'Committed to actively engage'

Heather Heelis FILCM DipHE
Parish Clerk

T: 01394 420207

E: clerk@rendleshampc.org.uk

www.rendlesham.suffolk.gov.uk

Philip Ridley
Head of Planning
East Suffolk Council
East Suffolk House
Station Road
Melton
Suffolk
IP12 1RT

1 February 2021

Dear Sir/Madam,

**PLANNING APPLICATION DC/20/5278/FUL
A PHASED DEVELOPMENT OF 75 DWELLINGS, CAR PARKING, PUBLIC OPEN SPACE,
HARD AND SOFT LANDSCAPING AND ASSOCIATED INFRASTRUCTURE AND
ACCESS**

Rendlesham Parish Council (RPC) Planning Committee have met to discuss the above application on the 25th January 2021, which was also attending by the applicant. The decision of the RPC Planning Committee was ratified via a full RPC meeting on the 1st February 2021. Whilst we acknowledge that there has been much improvement to this application since the previous application (C/19/1499/FUL), we are disappointed that the applicant has chosen not to engage with RPC at the pre application stage and hope going forward this can be remedied. Based on the detailed application as submitted RPC **object** to the application on the following grounds.

1. The application for 75 dwellings is not in accordance with East Suffolk Local Plan (Suffolk Coastal Local Plan), which has identified the site SSP12 (SCLP12.61) as suitable for "approximately 50 dwellings". Section 12.427 makes clear that Rendlesham has capacity to accommodate more than the 100 homes proposed, but is limited predominantly by highway factors and the cumulative impact of both residential and employment traffic on the local highway network, and also by education capacity. As it stands, including the outline planning application for 75 homes on the allocated site SCLP12.62 (DC20/3890/OUT) and the planning application for 11 homes on the commonly referred to 'sport centre site' (DC/20/1035), the cumulative impact to Rendlesham is 166 proposed new homes.

2. The detailed application includes no evidence of how the provision for 'Affordable Housing' will be delivered within the proposed development under object 3 of the Rendlesham Neighbourhood Plan nor SCLP5.10 (previously DM1). We note that the applicant has set up its own housing association (Community Capital Homes Limited) contrary to the expectation of the Development Control Team and the Housing Strategy and Enabling Manager of East Suffolk Council. The application also lacks the detail of whether the affordable homes will be divided between rented and shared equity.
3. The application is not compliant with the detail and aims of RNPP3 of the Rendlesham Neighbourhood Plan (RNP) in respect of allotments. RNPP3 clearly states that 'New residential or mixed use development is required to make provision towards meeting identified local need for allotments, orchards and growing spaces. The applicant has inferred that, as allotments have been provided on SSP13, there is no further requirement. This is incorrect as evidenced in the attached Rendlesham Allotment Strategy. The allotments proposed for SSP13 SCLP12.62 are equal to 5 standard allotments, the identified need is a minimum of 45. RNPP3 para 11.03 clarifies that allotments can be provided in several locations to meet the identified need. The Parish Council emphasises that at the point of sending this letter a waiting list of 87 residents exists for allotment plots
4. There has been no Financial Viability evidence provided with the application to allow assessment in line with Appendix G of the East Suffolk Local Plan.
5. Apparent "Closed Community" approach to marketing has challenged the availability of any (including the 'Affordable') properties to be available to fulfil the local housing need for those within Rendlesham or with ties to Rendlesham. During the meeting of the 25th January 2021 the applicants verbally advised RPC that marketing was not taking place and properties will be available in the future to the general public. Attached per appendix 2 to this letter is the more recent marketing material being circulated to targeted people by the applicant which is contrary to that statement.

The appended publication is located [HERE](#)

Should this application be approved RPC ask that the scheme is protected by a Section 106 agreement to ensure lettings and discount market ownership will be restricted initially to people with a strong connection to the parish. The Section 106 will also include the names of the abutting parishes to be included in the "cascade of eligible parishes" if there is no one left in need in the core parish. Each Local Authority will have its own definition of local need and local connection, but typically it would cover the following circumstances:

- Connection to the village by birth
- Current residence within the village for a number of years
- Former resident in the village within a set timescale
- Close family members resident in the village
- Employment in the village

(Community Action Suffolk)

6. RPC note the holding objection issued on the 27th January 2021 from Matt Williams, the SCC Flood and Water engineer, and agree that a further Flood Risk Assessment should be completed ahead of any consideration of the application.

It is not acceptable to RPC that in the event of extreme rainfall the current proposal will result in flooding to Tidy road and we look to the developer and the appropriate authorities to finalise a suitable surface water drainage scheme.

In light of the objection from SCC about the key proposals of the surface drainage system, RPC look to East Suffolk Council to refuse this application until this fundamental aspect of the design is agreed. Please refer to appendix 1 for pictures taken on the 29th January 2021 to reflect the current flooding issues on the boundary between the site and Tidy road

Other Considerations

1. Adoption of all roads, including service roads, on the development by SCC to ensure a satisfactory standard of highway construction.

RPC strongly support the adoption of the roads to ensure proper maintenance is undertaken which will also allow waste refuse collection, and emergency vehicle access to all properties on the proposed development. It also gives security/certainty to owner/occupiers about where responsibilities lie.

It is noted that Garden Square is not adopted and currently in a poor state of repair. During the meeting on the 25th January 2021 the applicant confirmed to RPC that the road was currently up to an adoptable standard and simply required the final surface. This statement is contrary to the Suffolk County Councils (SCC) Highways report which was included within the previous appeal [Here](#) and went on to state that the current road is not completed and would not be adoptable by SCC without considerable work commenting as follows:

- The base course has been exposed since 2005 and will now have oxidised, this surfacing will not be acceptable and would need to be removed.
- The footways have not been surfaced and have raised covers and other trip hazards.
- The street lighting would need to be assessed and brought up to current standards
- The kerbs have not been inspected and we do not know if they are installed correctly, and the correct levels for the final finished surface.
- Therefore, we have to assume that all of the existing construction will need to be removed and replaced to current SCC standards, prior to adoption.

RPC would like to see this road adopted before the development commences. To ensure enforcement of this RPC request that in the event of any approval a suitably worded Planning Condition is issued to the applicant.

We point out to East Suffolk Council that this was a very contentious issue on a previous development (by a separate developer some years ago) and we wish to avoid any such repeat.

RPC further note that the advice given in Pre Application (e-mail Ben Woolnough to CCD 07 December 2020 13:09) is in our view not strong enough on this point. That correspondence simply says *"It may be necessary to make the initial entrances of both ends of the loop road adoptable standard of the same form as the main road "*. The use of the word *"may"* suggests that there is some option. RPC do not see this as optional and ask East Suffolk Council to make the requirement clear and mandatory.

2. It is noted that areas of land are deemed to be intended for the use of the general public as part of the proposal. It is and has consistently been the view of RPC that the ownership of such land should be legally transferred to RPC ahead of development in order for its use as part of RNPP3 to be managed and maintained by RPC. The current intent of the developer seems to be the establishment of "his own" estate management company.
3. Disability access as per the comments raised by the Suffolk Coastal Disability Forum on the 21st January 2021 should be taken on board and incorporated into the overall design to ensure any development is accessible by all.
4. The traffic survey is restricted to home ownership for those practicing TM and therefore given the development should be accessible for the wider public to purchase a survey to reflect ownership on this basis should be provided as part of the application given the importance of the cumulative impact of the wider peninsular. It is noted that the development allocates parking for over 170 vehicles which will make significant impact on local traffic which should be considered in the new assessment.
5. A condition to any approval should include a provision for ground or air source heat pumps in line with Ministry of Housing, Communities and Local Governments published commitment to achieve a 31% reduction in carbon omissions, and the intended government legislation to outlaw new Gas Boiler installation in the near future which lies within the predicted timeline of the completion of the housing allocation on this site in East Suffolk Local Plan. RPC record and ask East Suffolk Council note that similar reasoning has been used recently in Ipswich (See EADT [here](#)) to reject a development proposal.
6. Whilst the applicant has alluded to 33% of the residents owning electric cars we do not believe it in the gift of the applicant to impose conditions on the ultimate owners. That said, the applicant has not included any charging points within the detailed planning application that RPC can see and we ask that a provision is made for these for every home (including shared points for flats).
7. To close the Tidy Road entrance with a barrier and used only as an emergency exit during the construction period.
8. All construction traffic to be parked on site and construction access is in accordance with an agreed site access plan and incorporated in a Construction Management Plan i.e. that all construction traffic is routed through Garden Square entrance/exit.

9. Contributions in respect of school and GP facilities and that CIL contributions are sufficient to mitigate the impact of the increase in population as a direct result of this development.
10. Habitats & Wildlife are not compromised as a result of the proposed development.
11. It is also noteworthy that the East Suffolk Local Plan expects this development to take 6 years to build 50 houses (see Local Plan page 514 – Appendix D). The plan actually shows first houses completed in 2023/24 (2½ years from now) with the expected delivery in the years as follows :-

FY 2023/24	FY 2024/25	FY 2025/26	FY 2026/27	FY 2027/28	FY 2028/29
5	10	10	10	10	5

This suggests that the development of 50 houses would take until late 2028 to complete. This programme effectively means vehicular disruption (if the actual number is 75) until the end of the decade. RPC feel this protracted duration justifies an objection on the grounds of “environmental impact” and quality of life for the existing residents.

We welcome the applicant confirming during the course of the meetings on 25th January 2021 and 1st February 2021 that they will engage with RPC in the future with regards to proposed/potential developments.

Yours sincerely

Heather Heelis
Parish Clerk

Encs

CC – Cllr Ray Herring