



Rendlesham Parish Council

'Committed to actively engage'

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Planning Department
East Suffolk Council
Riverside
4 Canning Road
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NR33 0EQ

16 May 2019

Dear Sir/Madam

**PLANNING APPLICATION C/19/1499/FUL
A PHASED DEVELOPMENT OF 75 DWELLINGS, CAR PARKING, PUBLIC OPEN SPACE,
HARD AND SOFT LANDSCAPING AND ASSOCIATED INFRASTRUCTURE AND ACCESS**

Rendlesham Parish Council have met to discuss the above application. As part of their consideration of the application the Parish Council held a public consultation on 8 May 2019.

Whilst the application met some of the criteria of the Rendlesham Neighbourhood Plan, this was outweighed by the number of matters detailed below in our response that were not met.

The Parish Council therefore **object** to the application.

- 1) RNP Objective 3a – Type and Design *'To ensure that there is a healthy mix in the type and design of housing built, particularly homes which attract first time buyers and homes for those less mobile to enable them to stay in Rendlesham if they so choose.'*

The proposals, whilst having a couple of bungalows, was weighted on large properties which did not match with para 10.13 and design principals para 10.14. given the houses attracted a premium given their specific design it was not felt this would attract first time buyers or those existing residents wishing to stay within the village.

Para 10.12 – as above, whilst the development includes 2 additional bungalows the development as whole has no emphasis on semi-detached dwellings, affordable housing or sheltered housing as required. Against this requirement flats / apartments and maisonettes have been included. The parish also raised concern with respect to affordable housing via a housing association, the developer remains confident that the minimal percentage for affordable housing is at their discretion and despite a condition in the last Parish Council response on the last application has not progressed a plan for social housing.

Some of the assessments eg the Transport Statement, made in the proposals restricted to a particular type of lifestyle, therefore were unrealistic as they did not reflect the activity of the general community.

Parish Office, Rendlesham Community Centre
Walnut Tree Avenue, Rendlesham, Suffolk, IP12 2GG

It is noted that the height of the buildings cause concern, exceeding the height of other 3 storey houses in the village.

Para 10.24 – the proposal has no emphasis on renewable energy or reducing energy and water. There is no provision for the charging of electric cars

The application does not meet the RNP

- 2) RNP 10.12 *'The type of housing people feel is needed is generally a mixed housing scheme but with emphasis on semi-detached dwellings and bungalows. Also identified is the desire for affordable housing (through a housing association) and sheltered housing with less emphasis on flats/apartments, maisonettes and bedsits.'*

At the last application there was indication that the affordable housing would be run through a housing association. There is no mention of this in the current application. Affordable housing schemes need to have in place effective management by a recognised organisation.

The application does not meet the RNP

- 3) Objective 3b – Density. *'To enable sufficient open space and on-street parking to be incorporated into housing schemes as identified in Appendix O. Appropriate housing densities are essential on development sites to enable well designed schemes that will take forward the objectives in the RNP and the provision of amenity land.'*

There is considered to be plenty of space and the density is low.

The application meets the RNP

- 4) Para 10.16 *'One of the problems identified is on-road parking, particularly where vehicles park half on/half off the road. This causes road crossing hazards and obstruction to pedestrians, pushchairs and anyone with mobility issues as well as giving the street scene a very cluttered appearance. To prevent this occurring in any future housing development, the road layout should incorporate sufficient off road parking for the householder plus on road parking in the form of landscaped parking bays.'*

There is considered to be sufficient off road parking.

The application meets the RNP

- 5) Para 10.18 *'Open green spaces and landscaping should be incorporated to avoid an urban appearance and contribute to the aesthetics of the village and its rural location.'*

The proposals incorporate open green spaces.

The application meets the RNP

- 6) Objective 3c – Street Scene. 10.20 *'In summary, the ideal street scene would have: • Sufficient off-road parking • On-road landscaped parking bays • Landscaping • Open green spaces • A grass strip between the road and footway • A low hedge • A brick wall or panel fencing where a rear garden fronts onto the road • Open front gardens • Natural fencing or timber post and rail.'*

The street scene meets the RNP criteria in providing the ideal street scene.

The application meets the above criteria in the RNP

- 7) Para 10.21 *'Road layout is another key factor in promoting a positive street scene. An artery road with lots of bends may seem at first to be a desirable design, however, as has been seen in some areas of the village, can lead to a street scene dominated by vehicles. Inadequate road widths can also have the same effect.'*

The application meets the above criteria in the RNP by providing a positive street scene

- 8) Para 10.22 *'Rendlesham has a good walking and cycling infrastructure within the village, which gives the majority of people the opportunity to walk or cycle to the District Centre in under 10 minutes. The good practice on new developments such as Acer Road, which promote shared use for pedestrians, cyclists and mobility vehicles, and Knight Road, which offers practical road width, should be built upon to provide continuity in being able to travel sustainably within the village.'*

The application meets the above criteria in the RNP

- 9) Objective 3e—Other Infrastructure. *'To ensure less tangible infrastructure is provided for. This list is not exclusive: telephony, sewage, and services such as doctors, dentist and family services.'*

There is concern the applicants solution to less tangible infrastructure is through CIL payments. Whilst such funds are only ever received when payment is made they will only partially fund infrastructure and the developers comment to that is we as a parish should look to resolve any deficit. Given the number of housing exceeds the RNP from approximately 50 to 75 this exasperates the issue of sustainable growth within the village.

The application does not make tangible commitment to providing infrastructure for the village. The Parish Council looks to East Suffolk DC on how to ensure the required infrastructure is provided.

It is noted in the Local Plan that developments in Rendlesham should make provision for a licensed premises. Whilst the location of the development site is not conducive for a licenced premises, a tangible contribution towards a facility could be made to provide a facility.

The application does not meet the RNP

- 10) Requirements in RNPP3 should be met and that adequate land is secured in perpetuity for the village for allotments, orchard and growing spaces.

The Parish Council have concerns that the current offer of an orchard is not sufficient to meet the requirements of RNPP3, which includes allotments to promote health and wellbeing. There is a lack of information on how the provision would be made and managed and how the orchard would meet the needs of the community.

The application does not meet the RNP

Other Considerations

The following are other matters that were raised in the previous application that were not addressed in the application to the satisfaction of the Parish Council.

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

The Parish Council note that the applicant is moving further away from the adoption of the roads, with mention of the developer maintaining the roads due to the wish not to have streetlighting.

The Parish Council strongly support the adoption of the roads to ensure proper maintenance is undertaken.

It is noted that Garden Square is not adopted. The Parish Council would like to see the road adopted before the development commences.

- 2) Assurance from East Suffolk Council that the commercial viability of the development is sound.

There are concerns regarding the length of actual time the development may take to build ie longer than 3 years. The legacy of a failed development is pertinent to the application. Based on the development of Garden Square and Gardenia Close the development time may be longer and therefore increased disruption to the residents of Rendlesham.

- 3) To recognise the need for local housing for local people as per the Rendlesham Housing Needs Survey in that that the affordable housing element of the development is delivered, managed and marketed by a registered Affordable Housing provider, embracing the parameters of the following affordable housing eligibility criteria normally reserved for exception sites:

Local connection

Provided the scheme is protected by a Section 106 agreement, lettings will be restricted initially to people with a strong connection to the parish. The Section 106 will also include the names of 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 residence in the village within a set timescale*
- *Close family members resident in the village*
- *Employment in the village*

(Community Action Suffolk)

- 4) To close the Tidy Road entrance with a barrier and used only as an emergency exit during the construction period.
- 5) All construction traffic to be parked on site and construction access is in accordance with the site access plan is incorporated in the Construction Management Plan ie that all construction traffic is routed through the Garden Square entrance/exit.
- 6) Flooding – Current evidence indicates the site causes surface water flooding to a number of properties in Tidy Road – Will the development include a suitable, sustainable, effective and adequate surface water drainage system to prevent future flooding to those properties.

Flood Risk Report (believed to be as previously issued)

Sec 3.1.4 refers to a “featurewhich could have a drainage function” which drains south towards the gardens of No 5 Tidy road. The residents of No 5 have not experienced any flooding of their property/gardens as yet, however, now have concerns based on seeing flooding in adjacent property (No 19). That flooding has previously been brought to the attention of the Planning Authority as part of public comments on the previous application ref DC/18/2374 (ref S R Lock 11 Tidy road letter of 16 July 2018).

It seems the “feature” does have “a drainage function” and the exact nature and function of it should be further investigated and understood before any design of drainage system is progressed.

Sec 3.2.5 to 3.2.7 refers to “further investigations (into the known Cast iron pipe) should be undertaken before construction commences”. The report of the investigation and the agreement of its findings should be made as a condition to any planning consent. This unknown is surely a material fact which may impact the viability/arrangements of the services and drainage to the site.

This situation is recognised in 5.2.6 as follows

“The detailed design will also need to include infiltration testing at each specific soakaway location.”

Sec 3.3 talks of “infilling part of the existing site watercourse” which will require “prior Land Drainage consent from Suffolk County Council”. As a Condition for support this consent should be explicitly granted as a planning condition before construction commences.

The weakness of the surface drainage case is recognised and the Applicant has identified the work he needs to do to justify his case. The Parish Council seek as a condition for support for all these matters (identified above) to be concluded, reported, submitted to East Suffolk through the Planning process and agreed with Authority and the requisite bodies.

- 7) 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.

The Parish Council have concerns regarding the provision of 75 dwellings and the capacity of the infrastructure. Concern that permission for 75 will set a precedent for the other site allocation resulting in an additional 50 homes without the community, leisure, retail and other infrastructure to support the increase in population.

- 8) Habitats & wildlife are not compromised as a result of the proposed development.

Impact is inevitable when agricultural land is developed. It is understood that this matter has been addressed separately with the relevant consultees.

The Applicant's state that the overall CIL contributions (ie to RPC and East Suffolk) total £700,000 and with the "New Homes Bonus" yielding an extra £600,000, the Parish Council seeks assurance from East Suffolk that as a condition for support at least some of this >£1m going to East Suffolk will be "ring fenced" for Rendlesham.

Thank you for taking these comments into consideration.

Yours faithfully

Heather Heelis
Parish Clerk

Cc – Cllr Ray Herring