



November 2019

Planning Appeal Statement of Case

Land North of Gardenia Close &
Garden Square
Rendlesham
Suffolk

Norfolk Office 01603 516319

Orchard House
Hall Lane
East Tuddenham,
Norfolk, NR20 3LR

Suffolk Office 01284 336348

The Northgate Business Centre,
10 Northgate Street,
Bury St Edmunds,
Suffolk, IP33 1HQ

Essex Office 01245 934 184

Moulsham Mill,
Parkway,
Chelmsford
Essex, CM2 7PX

Key Information

Application Reference	DC/19/1499/FUL Submitted April 2019
Decision Date	8 th July 2019
Site Address	Land North of Gardenia Close and Garden Square Rendlesham Suffolk
Development Description	A phased development of 75 dwellings, car parking, public open space, hard and soft landscaping and associated infrastructure and access.
Local Planning Authority	East Suffolk Council
Appellant	Capital Community Developments Ltd

Personal Statement

This Statement of Case has been written by Mr. Steven Bainbridge MRTPI. Mr. Bainbridge has 15 years planning experience in both the public (development control, policy and enforcement) and private sectors and is the Principal Planning Manager for Suffolk at Parker Planning Services Ltd. In a previous employ Mr. Bainbridge submitted the earlier planning application of June 2018 for this site. Mr. Bainbridge has over a decade's experience of planning work in the Rendlesham area including:

- Multiple major planning applications at Bentwaters Parks Rendlesham spanning the period 2006 to 2018.
- 2010 awarded first place in the East of England Royal Town Planning Institute Planning Award for a renewable energy plant at Bentwaters Rendlesham.
- Local plan allocations achieved in the Suffolk County waste local plan.
- 2013 to 2015 advised on the Rendlesham Neighbourhood Plan (a Government front runner) and wrote the principal policy RNPP1 which safeguards the district centre for the future.
- 2015 awarded 1st place in the East of England Royal Town Planning Institute Planning Award for the Rendlesham Neighborhood Plan.
- 2013 advised the parish council on resisting a planning application for 50 houses on the two 'available' sites in the Rendlesham district centre and thus saving the heart of the village for the future.
- 2015 Successful in seeking the allocation of Bentwaters in the Site-Specific Allocations DPD – the local plan policy SSP24 being largely written by him.
- 2018 and 2019 Planning applications for the erection of 75 dwellings on Site SSP12.

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1.0 Introduction

- 1.1 This planning appeal is made under s.78 of the Town and Country Planning Act 1990 against East Suffolk Council's ("the Council") decision of 8th July 2019 to refuse planning permission for "A phased development of 75 dwellings, car parking, public open space, hard and soft landscaping and associated infrastructure and access" (the "development") on "Land North of Gardenia Close And Garden Square, Rendlesham, Suffolk" (the "appeal site") planning application ref. DC/19/1499/FUL.
- 1.2 This Statement of Case has been prepared by Parker Planning Services Ltd. on behalf of Capital Community Developments Ltd. ("the appellant"), who was also the applicant.
- 1.3 Members of the appellant's team have successfully delivered high quality housing on land immediately adjacent to the appeal site in recent years, a very similar development to that proposed now, for which the Council granted planning permission in October 2004. In this appeal the Council will claim that the inconsistency between the granting of planning permission for the development on Garden Square and Gardenia Close and the refusal of planning permission for the appeal site is because their policies have moved on. We will demonstrate why this is not the case.
- 1.4 The appellant's position from the very start is that the planning context for the determination of this proposal was very clear; the site is allocated, 75 dwellings can easily fit, the design and layout has already been 'signed off' by the local planning authority. The appellants have provided answers to all the questions raised by the local planning authority at every stage. Entering into this appeal the Appellant's policy arguments remain unchanged.
- 1.5 In this appeal it will be demonstrated that the proposal is utterly policy compliant and that the core issue is one of numbers; for which the appellants have provided the necessary evidence throughout the planning process and in different arenas.
- 1.6 The appellants are residents of Rendlesham and have a proven track record in delivering development in Rendlesham which is important because delivery of housing is clear Government policy.
- 1.7 The intention is to develop houses and associated infrastructure which complement the village and the existing development at Garden Square and Gardenia Close, with a range of development gains which will benefit the wider community.

- 1.8 One example of this is the CIL uplift arising from the increase from 50 dwellings to 75. In the ESDC policy response the policy officer highlights the transport infrastructure problems at the Melton Crossroads as justification for the ‘capping’ of housing numbers in the ongoing housing allocation. The ESDC policy officer points to Appendix B of the emerging local plan and to the Infrastructure Delivery Framework. In that framework the Council say that the measures required to improve capacity at the Melton Crossroads (a reason often given by the Council and consultees for constraining development on the Deben peninsula) are to be provided by developers through CIL contributions over the plan period and would amount to an estimated £250,000 to £300,000. By way of a simple comparison exercise¹, the uplift in CIL contributions from increasing the development capacity of the appeal site from 50 dwellings to 75 dwellings will deliver a CIL dividend of some £230,000 from one allocated site². For context, were site SSP12 developed efficiently to its full capacity, then the CIL dividend from an increase from 50 to 96 dwellings could be some £425,000 thereby addressing the Melton Crossroads infrastructure constraints with funds to spare. If the local planning authority wish to positively address these published infrastructure constraints, then proposals such as this one should be championed for “significantly boosting housing supply” on an allocated site with no demonstrable harm and delivering CIL dividends which the Council could use to fund publicly visible infrastructure improvements. Instead the appellants have experienced two rounds of pre-app and two refusals.
- 1.9 The houses conform to specific architectural and design principles and perform very well environmentally; indeed, the Council’s emerging local plan has policy aims which complement the design rationale, with increased focus on sustainable architecture, even the ‘orientation of buildings’³. The scheme is exceptionally well landscaped providing a high-quality built environment surpassing usual proposals and, according to the Parish Council, has an “ideal street scene”.
- 1.10 The appeal site is identified in the existing and emerging local plans and has long been earmarked for housing development. Whilst the local plan currently allocates the site for approximately 50 dwellings it has historically been allocated for 75 dwellings because that

¹ We have used the LPAs CIL Calculator extrapolated b=new build floor space figures from that given for the 75-dwelling proposal.

² This does not imply an expectation that all of the CIL uplift goes to the Melton Crossroads, rather it is an example of how the local planning authority could, take a positive approach, and ‘squeeze’ higher CIL takings from their allocated sites and start to deal with long-standing infrastructure issues.

³ Emerging local plan paragraph 9.17 and policy SCLP9.2 Sustainable Construction

is what the site can accommodate.

- 1.11 The Government's objectives to boost housing supply and use land efficiently on sustainable sites is well established.
- 1.12 The Council's local plan is clear that the allocations are contributing to a district-wide minimum housing requirement and that Rendlesham can likely accommodate more than the 100 dwellings currently allocated to it.
- 1.13 The Council's emerging local plan is better aligned to Government policy because it is promoting a new growth strategy which includes "Significantly boosting the supply of housing".
- 1.14 It is essential then that decision makers and interested parties do not regard the 'approximately 50' figure as a cap limiting housing numbers but rather as a minimum to be exceeded where at all possible.
- 1.15 Pre-application advice from the LPA supports the contention that the site can accommodate 75 dwellings. The increase in houses proposed for this site from the minimum 50 to 75 has wider benefits to society including higher community infrastructure monies and higher proportions of affordable housing which will need to be given appropriate weight in the decision-making process as well as other development-generated benefits as summarised below.

Main Issues

- 1.16 In line with PINS Guidance this Statement of Case responds to the Council's reasons for refusal as set out in their Decision Notice dated 8th July 2019. Planning law requires local planning authorities to set out clearly how the development fails to comply with the development plan.
- 1.17 In this appeal the appellant sets out what he considers to be the main issues, but as the reasons for refusal are sometimes difficult to divine from the Decision Notice and Delegated Report, the Statement of Common Ground is a vitally important document at this stage in the appeal.
- 1.18 The appellant directs the Local Planning Authority to the recent changes to Planning

Appeal's Procedural Guide⁴ and the new and clear emphasis to (our emphasis) "send us [PINS] the main SoCG that they have jointly prepared and agreed with the appellant".

1.19 Main planning issues:

- Whether the development accords with the development plan having regard to:
 - the quantum of development
 - and whether the layout and design are in conformity with the Development Plan and whether the LPA has demonstrated consistency in decision making
 - if there is any material derogation from the Development Plan, other material considerations indicate that permission should be granted and the appeal allowed.

Quantum and Principle of Development

1.20 Currently in Suffolk Coastal the Council is operating under an aged local plan. This, by their own admission (Appendix 1), places them in tilted balance territory.

1.21 The Appellant considers that the Council are firmly in tilted balance territory and this is because the 'Most Important Policies' are SP2 (housing numbers and distribution), SSP1 and SSP12:

- The Core Strategy and its policy SP2 are out of date because it is older than 5 years and the LPA are working on new higher housing numbers.
- Policy SSP1 delivers the Core Strategy housing targets and is therefore out of date as a result.
- Policy SSP12 derives from SSP1 and is therefore out of date because it is linked back to SP2.

1.22 It is entirely arguable that the tilted balance applies in this case. However, **the Appellant's case does not necessarily depend upon this** for reasons given below and as set out in the submitted Planning Statement.

1.23 In his planning application the appellant advanced two ways to approach the matter in policy terms depending on which way the Council decided to approach the tilted balance. The Planning Statement made clear in paragraphs 6.11 to 6.13 that a two-pronged approach was being taken:

⁴ <https://www.gov.uk/government/news/new-process-for-statement-of-case-submissions-and-statement-of-common-ground>

- Determination in line with the Development Plan and
- Determination in the context of the tilted balance

1.24 This was in part because of the unclear guidance received from the Council during pre-application discussions on the status of the development in relation to NPPF paragraph 11 and the tilted balance. It will be argued that if, which is not accepted, the proposals are not in accordance with the development plan, other material considerations indicate that permission should be granted and that this may include the operation of the tilted balance. Even if the Tilted Balance is not found to apply, other material considerations should tip the balance in favour of the proposal because any derogation would be of minor significance compared to the benefits that the development would bring.

Conformity with the Development Plan

- 1.25 It will be submitted that the Council has failed to properly consider the merits of the proposal in the context of both the Development Plan and other material considerations.
- 1.26 Other than the 'most important policies' discussed above, the Council refer to the following policies in their decision notice; DM21 & DM22, DM23, SP14 & DM27, SP3 and DM2.
- 1.27 In relation to the site-specific policy, and leaving the quantum issue aside, the proposal demonstrably meets or otherwise addresses the requirements of the Site-Specific policy SSP12.
- 1.28 Turning to the design policies DM21 and DM22 we will demonstrate that the proposals demonstrably meet their requirements (and as demonstrated by the Council in approving the Garden Square and Gardenia Close proposals. Nothing in the policy context has changed since then.
- 1.29 In terms of housing mix, tenure and affordable housing the proposals will be shown to be policy compliant.
- 1.30 Reflecting the requirements of policy DM23 the existing and future occupants will not experience an unacceptable loss of amenity.
- 1.31 Compliance with matters relating to ecology and habitats are dealt with below and show the proposals were compliant with policies SP14 and DM27.
- 1.32 Although unmentioned in the decision notice, only one neighbourhood plan policy RNPP3

applies (being part of the Development Plan) to the development and its non-preferential requirements are met.

- 1.33 In this appeal we will demonstrate that, in the absence of clear and compelling policy reasons, the local planning authority have, instead, sought to rely on a superseded informal design guidance document of no statutory significance and in doing so have used it inappropriately in a manner the authors of that guidance say it should not be used (see Appendix 9).

The Council's Approach to Decision Making

- 1.34 Paragraph 38 of the NPPF states:

"Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible."

- 1.35 The NPPF requires Councils to apply the presumption in favour of sustainable development. This follows on from the Ministerial Statement of March 2011 (which remains a material consideration):

"The Government's top priority in reforming the planning system is to promote sustainable economic growth and jobs. Government's clear expectation is that the answer to development and growth should wherever possible be 'yes'..."

- 1.36 It is submitted that the Council have in effect 'rushed to refuse' and have, therefore, denied themselves the opportunity to have all the information they believed was necessary to make a balanced decision on the merits of the proposal in the context of the Development Plan and National Planning Policy and Guidance.

- 1.37 The Appellant will argue that the Council's failure to approach the decision of the proposed development "in a positive and creative way", in having disregarded Planning Practice Guidance and failed to fulfil its duties appropriately, which has resulted in an appeal which should not have been necessary.

Characteristics of the Planning Appeal and Choice of Procedure

- 1.38 Due to the Council's 'rush to refuse', several matters raised by them are resolvable in this planning appeal. The appellant remains willing to discuss these with the Council, in order that it meet its responsibility to submit the final Statement of Common Ground. The appellant is of the view that the Council needs to 'cross the floor' on several issues and therefore the Statement of Common Ground necessarily identifies the extent of uncommon ground at this stage.
- 1.39 The appellant also remains firmly of the opinion that the Council has made several significant errors of judgement which warrant cross examination; in particular, of the Planning Case Officer and the Major Projects Officer in relation to design, amenity and policy issues and other relevant matters.
- 1.40 Annexe K of the August 2019 PINS Appeals Procedural Guide sets out the circumstances when the Inquiry Procedure is most appropriate. Taking the criteria in Annexe K in turn:
- Is there a clearly explained need for the evidence to be tested through formal questioning by an advocate?
 - The issue of design needs to be fully examined in a manner not conducive to round table discussions.
 - It is unlikely that the parties will be able to present their own cases effectively without the support of advocates.
 - Are the issues complex?
 - At this stage, unless a number of issues in the Statement of Common Ground can be resolved in principal, then the interrelationship and overlap between planning history, local plan matters, design, policies etc. are complex.
 - The application of the tilted balance will require careful consideration of relevant case law.
 - Has the appeal generated substantial local interest to warrant an inquiry as opposed to dealing with the case by a hearing?
 - The proposal has generated significant local interest with larger number of local people writing to the planning application in support than objection. Whilst many of the individuals may not wish to take an active part in the inquiry, they are likely

to want to observe formal proceedings, particularly in the context of a recently adopted Neighbourhood Plan.

1.41 For the reasons set out above it is submitted that a Public Inquiry is the appropriate method for the determination of this appeal. At this stage, and assuming the Council engages positively with the Statement of Common Ground, the appellant considers that an Inquiry lasting three days should be sufficient, allowing for:

Day 1

- Opening Statements
- Presentation and cross examination of the Council's case

Day 2

- Presentation and cross examination of the Appellant's case
- Presentation of any Third Party cases

Day 3

- Planning Obligations and Conditions
- Closing Statements

The History to the Planning Appeal

1.42 The Appellants have engaged fully with the planning system:

- Local plan hearings (September 2016)
- Pre-app 17/5074 (November 2017)
- Planning application 18/2374 (June 2018)
- Local plan reps (September 2018)
- Pre-app 18/4778 (November 2018)
- Local plan reps January 2019
- Planning application 19/1499 (April 2019)
- Local plan reps July 2019
- Local plan hearings (September 2019)

- 1.43 The planning application 19/1499 was a 'free go' resubmission of an earlier planning application (18/2374). The Planning Statement for planning application 19/1499 is included in Appendix 2 for ease of reference. The Planning Statement includes the respective pre-application correspondence 18/4778 in its own Appendix 1. The Planning Statement to 19/1499 in its Section 3 set out in detail how the reasons for refusal from 18/2374 and the matters discussed in pre-app 18/4778 had been fully accounted for.
- 1.44 The Appellant has not entered into this planning appeal lightly but due to the manner in which the LPA behaved in determining his planning application; the Appellant decided it was the only recourse left to him. In Appendix 3 we have included correspondence with the Council regarding planning application 19/1499 and this includes a copy of a legal advice note provided by Counsel to the appellant and shared with the Council on 12th June 2019 ahead of their determination of 19/1499 on 8th July 2019. The email of 12th June 2019 also includes reasoning for why the LPA should have requested an extension of time.

The Quality of the Council's Pre-application Advice

- 1.45 The Council have referred to their pre-application advice in the officer's report to 19/1499 and are likely to continue to do so in their appeal statements.
- 1.46 The Council's website says of the pre-application advice service that *"The intention is to ensure you are in as strong a position as possible to address all the relevant planning issues prior to the submission of any application, and that you are aware of the information required to accompany your application, so that it can be validated on receipt"*.
- 1.47 It is the Appellant's case that the pre-application advice given on this, and his previous planning application, was not clear or comprehensive, because many of the issues later raised by the Council were not mentioned at the pre-app stage.
- 1.48 The pre-application advice is included in full in Appendix 1 of the Planning Statement in case the Appellant needs to show that the Council's opinion of their own performance in the pre-application exercise does not match the appellant's experience of it.

Post-validation Engagement

"Can additional information be requested by the local planning authority after an application has been validated?"

Information can be requested after the application has been validated, although normal time periods for determining the application continue to apply unless a longer period is agreed in writing between the applicant and local planning authority to extend the determination period.

Any request for further information under section 62(3) of the Town and Country Planning Act 1990 must meet the tests in section 62(4A) and must not affect the validity of an application, where it has been validated and registered.

Paragraph: 060 Reference ID: 14-060-20140306

Revision date: 06 03 2014”

“Can an applicant amend an application after it has been submitted?

It is possible for an applicant to suggest changes to an application before the local planning authority has determined the proposal. It is equally possible after the consultation period for the local planning authority to ask the applicant if it would be possible to revise the application to overcome a possible objection. It is at the discretion of the local planning authority whether to accept such changes, to determine if the changes need to be reconsulted upon, or if the proposed changes are so significant as to materially alter the proposal such that a new application should be submitted.

Paragraph: 061 Reference ID: 14-061-20140306

Revision date: 06 03 2014”.

1.49 In this case no such request came from the Council.

1.50 It is also clear that local planning authorities are encouraged/allowed to seek additional time if a genuine requirement arises and in order to determine a planning application and reduce the number, range and scope of reasons for refusal. Planning Practice Guidance states:

“In what ways can a longer time period be agreed?

Where it is clear at the outset that an extended period will be necessary to process an application, the local planning authority and the applicant should consider entering into a planning performance agreement before the application is submitted.

*If a valid application is already being considered and it becomes clear that more time than the statutory period is **genuinely required**, then the local planning authority **should** ask the*

applicant to consider an agreed extension of time. Any such agreement must be in writing and set out the timescale within which a decision is expected.

The timetable set out in a planning performance agreement or extension of time may be varied by agreement in writing between the applicant and the local planning authority.

Paragraph: 003 Reference ID: 21b-003-20140306

Revision date: 06 03 2014"

1.51 NPPF Paragraph 47 states:

*"Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales **unless a longer period has been agreed by the applicant in writing.**"*

1.52 It is the appellant's contention that bearing in mind the content of NPPG paragraph 048 above, the LPA should have followed NPPG paragraph 003 and requested an extension of time.

1.53 No such request was forthcoming from the LPA who have behaved unreasonably in generating reasons for refusal which could have been avoided if the Council had sought additional information to allay concerns. Indeed, the Council refused the appellant's suggestion of 12th June 2019 for an extension of time. As a minimum this could have included:

- Reasons for Refusal 1, 3 and 5 – the LPA could have engaged positively, posed many of the questions and issues raised in the officer's report and been given the answers (Appendix 9) to indicate that its concerns were unfounded.
- Reason for Refusal 2 – the LPA could have responded to the draft heads of terms and requested the affordable housing locations plan sooner.
- Reason for Refusal 4 – the LPA would have better understood the information in the submitted Odour Assessment and would, therefore, have understood that odour concerns would be satisfied.
- Reason for Refusal 6 – the LPA could have engaged in discussions with the Appellant's ecology consultant on the HRA matters. The LPA could have consulted the relevant statutory consultee, Natural England, but did not. The Appellant's ecology consultant

will be initiating that process now.

- Reason for Refusal 7 – The Appellant has been aware of the sewers on the site for some years. In October 2016 Anglian Water submitted some plans, but they were indicative. In February 2018 the Appellant arranged for Flowline to undertake a survey of the sewers to pinpoint their precise location. This was submitted as a drawing with the application, and it was reproduced in the Flood Risk Assessment of May 2019, Appendix F. It is also shown in the Nett Developable Area Plan in Appendix 5 of the Planning Statement. At an early stage it was decided that it will be necessary to divert a section of the sewer under the central east-west road. The Site Layout Plan is based on diverting a section of the sewer and accommodates the remaining existing sewers and the required easements. This was explained in the Planning Statement, paragraph 6.53 “The layout has accommodated the sewers at significant expense and includes a proposal to realign them. The necessary survey work has been undertaken to ensure this will be achieved without detriment to the existing sewer system”. The sewer diversion was also mentioned in the Flood Risk Assessment of May 2018, paragraph 3.2.7 “The site layout will require the diversion of the existing 750 mm diameter public surface water sewer”. On 28 May 2019 the Appellant’s civil engineering consultants submitted a Section 185 diversion application to Anglian Water, ref SD-0037727. However, the LPA were not aware of this, as they did not request any further information on the sewer diversion prior to refusal. The sewer diversion is a significant infrastructure cost, but it should be kept in perspective. The Economic Viability Analysis estimates the total design and build costs of the project to be £12.2m. It allows £90,000 for the sewer diversion in the list of abnormal costs. This is about 0.7% of the total design and build costs. We will argue that policy SSP12 does not require the developer to demonstrate that the sewers had been accommodated; simply to “accommodate the sewers that cross the site”. If the LPA wanted comfort, beyond the information already in the planning application, that the sewers had been accommodated, then the LPA could have sought further confirmation from the applicant.

2.0 Updates Since the Decision was Issued

The Implications of the Council's Failure to Consult Natural England⁵

- 2.1 It appears that the Council did not consult Natural England in relation to 19/1499. There is no reference to them in the officer's report or on the Council's planning pages under either the Comments tab or Documents tab. It also appears that the Council did not consult Natural England on the previous planning application 18/2374.
- 2.2 If the Council did not consult Natural England on the planning application 19/1499 then they have failed in their statutory duty and this puts into question the lawfulness of their decision notice from 8th July. It is vital that if the Council did not consult Natural England during the course of 19/1499, that Natural England are consulted now in order that the Inspector's decision is not left vulnerable to legal challenge because of the Council's failure to discharge their statutory duties.
- 2.3 Therefore, the Appellant has taken the initiative and instructed his ecology consultant to initiate the process of consulting Natural England in order that the matter is resolved before the Inspector comes to make a decision.

The Odour Assessment of September 2019

- 2.4 Reason for refusal no.4 for planning application 19/1499 is that "insufficient assessment information" regarding odour from the Water Recycling Centre. The merits or otherwise of this reason for refusal is discussed in detail in the relevant section below. Notwithstanding, the inclusion of this reason for refusal triggered a review of the previous assessment by the appellant, in part, in preparation for his local plan work.
- 2.5 As can be seen from the odour assessment in Appendix 4 the report has been 'improved' to show the current layout plan; the Council having criticised the 2018 report for having shown an earlier layout. In addition to the latest layout being incorporated, the appellant's odour consultants have also included a new drawing which shows the cordon sanitaire (referred to in the adopted and emerging policies) imposed on an aerial photo of the site as a 'development boundary' regardless of layout. This will aid decision makers in relating the conclusions of the report to any future layout.
- 2.6 Through the process of reviewing the Council's refusal reason no.4 it became evident that the cordon sanitaire was based on an earlier odour report from 2014. As can be seen from

⁵ in relation to its legal duty under Regulation 63(3) of The Conservation of Habitats and Species Regulations 2017 ("The Habitats Regulations").

representations made to the Local Plan process, that 2014 report was based on anomalous data. Subsequent odour reports are based on data which represents the proper functioning of the Water Recycling Centre (WRC). In short; odour levels are so low (in the 2018 and 2019 assessments) that the need for a cordon sanitaire is now clearly in question and this is confirmed by the recent email from Anglian Water (also in Appendix 4).

- 2.7 Representations were made to the Local Plan Examination seeking to have the relevant criteria from the emerging policy SCLP12.62 amended to reflect the new evidence or removed entirely.
- 2.8 At the point of writing this Statement of Case the appellant is awaiting feedback from the Local Plan Inspector on the discussion from the 2019 Local Plan Hearings and whether the emerging policy SCLP12.62 (replacement to SSP12) will be subject to modifications.
- 2.9 We will update this appeal accordingly if the emerging policy changes as this has a further direct bearing on reason for refusal no.4 and other reasons where the Council refer to concerns about odour.

Noise Assessment

- 2.10 In addition to a new odour assessment the appellant has commissioned a noise assessment. Whilst noise from the WRC has not thus far been raised by the LPA as a reason for refusal the Council's own Environmental Health Officer advised the Planning Officer as such in the consultation response of 15th April 2019 "*A noise assessment should be submitted **prior to determination** of the planning application*".
- 2.11 A noise assessment is appended to this Statement and concludes, in line with advice received from the East Suffolk Environmental Health Officer:

*"Taking into account the cordon sanitaire around the [sewage treatment] works noise levels during the day and night time (both external and internal) will be **below the criteria recommended by the Environmental Protection Officer**. Notwithstanding in accordance with the policy aims of the NPPF to mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development reduce noise it is recommended that a bund/barrier is constructed along the northern boundary of the site to screening the treatment works. **The above mitigation measures can be enforced through a suitably worded planning condition**".*
- 2.12 As the proposed bund/fence barrier is located in the root protection area of trees a clarification email from the tree surveyor is appended to this Statement.

3.0 Planning Policy Context

Development Plan Status

- 3.1 As a core planning principle, the NPPF requires local planning authorities to keep their local plans up to date.
- 3.2 The local planning authority have accepted through pre-application advice that policy SP2 of the Core Strategy is out of date. This remains the case since the previous planning application.
- 3.3 Policy SP2 is out of date because of the late commencement of the Local Plan review which has resulted in the Core Strategy and Development Management Policies being out of date.
- 3.4 The result of the Council's principal planning policy on housing supply and distribution (Core Strategy policy SP2) being out of date is that it, and the policies that derive from it are the 'most important' in the decision-making process, should be given less weight and should not be used to limit, otherwise acceptable, development on sustainable sites.
- 3.5 At the time of writing this Statement of Case the Development Plan consists of:
 - Core Strategy and Development Management Policies (adopted in 2013 and now over 5 years old)
 - Site Allocations and Area Specific Policies (adopted in 2017)
 - Rendlesham Neighbourhood Plan Policies (Made in 2015)
 - Saved Policies of the 2001 Local Plan
- 3.6 A full list of the development plan policies which the Appellant considers relevant to his appeal are included in the Statement of Common Ground.

Material Planning Considerations

- 3.7 At the time of writing this Statement of Case the following are material considerations:
 - Suffolk Coastal Local Plan Review Policies
 - Rendlesham Neighbourhood Plan Objectives
 - National Planning Policy Framework
 - National Planning Practice Guidance
- 3.8 A full list of the material planning policies and objectives which the Appellant considers relevant to his appeal are included in the Statement of Common Ground.

4.0 Appellants Responses to the Reasons for Refusal

Preface

- 4.1 As set out above it is the Appellant's contention that the development proposal 19/1499 entirely compliant with development plan policy (SoCG) (irrespective of the tilted balance).
- 4.2 An examination of the reasons for refusal shows that they have no substance.

Reason for Refusal 1 Number of Dwellings and Design

- 4.3 The first reason for refusal RfR1 is not clearly expressed contrary to the DMPO 20106. It talks of policy "elements" without necessarily clarifying what those elements are.
- 4.4 RfR1 appears to be making two arguments: the number of dwellings and design. The latter topic being covered in RfR 3 and RfR5. We have therefore approached both lines of argument below. It is, however, the appellant's contention that the number of dwellings should predominantly be guided by the established principle of development and by an assessment of appropriate density having regard to relevant site constraints and the need to make efficient use of land (NPPF paragraph 122). The proposed development has a density of only 23 dwellings per hectare (75/3.2 developable hectares), already well below the perfectly acceptable 'rule of thumb' density of 30 dwellings per hectare. The Council's policy would see a development of approximately 16 dwellings per hectare; a truly wasteful use of an allocated site if there are no practical constraints that would otherwise justify it. It is also of contextual relevance that development densities are higher in Rendlesham than other rural villages.
- 4.5 RfR1 is an adaptation of the earlier RfR1 from the decision notice for 18/2374 which claimed that 75 dwellings in principle was unacceptable simply because it was more than 50. The Council has necessarily adapted its position and now claims that 75 dwellings is not possible because of the layout and form of the proposed development.
- 4.6 The appellant has engaged positively and responsibly with the local plan process from the start seeking changes to the site allocation including increasing the quantum of development back to the level of 75 dwellings which it had been since the mid-nineties and

⁶ Sections 35.(1)(b) and (2) of the Development Management Procedure Act 2010 (as amended).

in the previous local plan. This is referenced in the first sentence of paragraph 2.98 the adopted Site Allocations DPD at paragraph 2.98 where it states “This site is the northern of the two sites identified on the plan above. The site was formerly allocated for housing development for approximately 75 units”.

- 4.7 Local plan representations in September 2018 and January 2019 have set out in detail and at length why the site should be allocated for 75 dwellings again. This includes evidence for why there is no longer any basis to the Council’s claimed ‘limiting factors’ due to which the site allocation was reduced from 75 dwellings to “approximately 50”.
- 4.8 The Council’s approach to housing delivery is clear. The Core Strategy (Objective 2) only offers “to meet the minimum locally identified housing needs of the district for the period 2010 to 2027”. This is to be contrasted to the approach being promoted in the emerging local plan to ‘exceed’ minimum housing requirements to provide ‘confidence that housing demand is being met’⁷. It is considered that only meeting the minimum housing requirements is not compliant with the NPPF and ‘significantly boosting the supply of homes’. Therefore, strict adherence by the Council, to its old core strategy approach to housing provision, and the derivative site allocations, should be viewed as running contrary to national planning policy; something acknowledged by the emerging local plan and its more positive approach.
- 4.9 RfR1 uses Strategic Policy SSP12 as if it were a Development Management policy which it should not do⁸. A strategic policy guides the type of development in order to keep it aligned with the strategic aims of the Core Strategy; it is not a development management policy or non-strategic site-specific policy.
- 4.10 An East Suffolk Council headed Hearing Note from the recent local plan examinations makes very clear that the Council needed to be clearer on the separation of strategic and non-strategic policies in the emerging plan (Appendix 5). The note includes the successor policy to SSP12 (SCLP12.62) in the list of strategic policies. It is submitted that logic applies to policy SSP12 which is therefore also a strategic policy.

- 4.11 Paragraphs 21 and 28 are very clear on this:

“21. Plans should make explicit which policies are strategic policies¹³. These

⁷ Final Draft Suffolk Coastal Local Plan paragraph 3.39

⁸ Policy SSP12 is a Strategic Policy (NPPF paras 21 to 23) and its use for denying planning permission for proposals which are broadly in line with it is limited.

should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies”.

“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.”

- 4.12 In this appeal we will demonstrate that the proposed development has in fact complied very well with the general thrust of the policy and, where relevant or justified, many of its criteria.
- 4.13 Site Allocations Policy SSP12 Land West of Garden Square Rendlesham is the site-specific policy and states that the site is allocated for “approximately 50 units”. It provides criteria against which planning applications will be assessed.
- 4.14 The requirement for ‘approximately 50 units’ does not preclude a submission for 75. Notwithstanding, the pre-amble to policy SSP12 and elsewhere in the development plan, it is clear that the Local Plan housing figures are minimums and not ceiling figures. From that perspective the proposal is achieving what the Core Strategy aims to do, to meet the minimum housing figures. In addition to this the Core Strategy housing figures on which SSP12 is based are out of date and in that case the NPPF requires local planning authorities to respond positively and to boost housing numbers accordingly. Therefore, the conflict with this policy, is merely a numeric one and the ‘over-provision’ actually conforms to wider objectives of the development plan.
- 4.15 Policy SSP12 requires any development to meet the minimum distance from the Water Recycling Centre which the proposed layout has achieved.
- 4.16 Policy SSP12 requires the provision of a flood risk assessment. This has been undertaken and has concluded no adverse flood risk.
- 4.17 Policy SSP12 requires development to accommodate the sewers that cross the site. The layout has accommodated the sewers at significant expense to the applicants and includes

- proposals to realign them. The necessary survey work has been undertaken to ensure this will be achieved without detriment to the existing sewer system.
- 4.18 Policy SSP12 requires there to be adequate capacity in the foul network. The drainage report accompanying this planning application confirms this is the case.
- 4.19 Policy SSP12 requires the design, layout, mix and type of housing to be compatible with the housing and transport objectives in the Rendlesham neighbourhood plan. The submitted Planning Statement set out below how this proposal reflects those objectives, in particular the recognition in the neighbourhood plan that the existing housing layout at Garden Square is something which the parish council supports.
- 4.20 Policy SSP12 requires the provision of affordable housing. The planning application proposes 33% affordable housing (25 units) consisting of 48% affordable rented (12 units) and 52% Discounted Market Sales (13 units) in compliance with policy DM2.
- 4.21 Policy SSP12 states that “remaining greenspace should be used for a mix of informal open space suitable for daily dog walking, allotments or orchards in accordance with Rendlesham Neighbourhood Plan policy RNPP3”. A significant area of open space and orchards is provided on the site.
- 4.22 Policy SSP12 requires the provision of a “substantial landscape buffer to the northern and western boundaries where the site abuts open countryside”. The site does not abut open countryside on its northern and western boundaries, and this is clear from the photos in this statement, therefore a substantial landscape buffer is not required but a buffer has been provided in places nevertheless.
- 4.23 Policy SSP12 requires that an archaeological assessment be provided, and this has been done. The geophysical report and trenched evaluation confirm no risk to below ground archaeology requiring preservation in situ or justifying the refusal of planning permission.
- 4.24 Policy SSP12 also requires the submission of a transport assessment. In this case a simpler Transport Statement has been provided, although it makes clear that the conclusions show even that level of reporting was not necessary. The transport statement has nevertheless concluded that the planning application meets the requirement of the NPPF to provide for safe and suitable access and not to cause a severe residual cumulative impact on the local road network.
- 4.25 Policy SSP12 states that, in addition to the criteria discussed above, air quality impacts on

the AQMA in Woodbridge need assessing. This has been done and the report has confirmed no impact.

4.26 The planning application therefore complied with all the criteria of policy SSP12.

4.27 RfR1 introduces design and amenity policies DM21 and DM23 to justify this reason for refusal but does not identify which elements of those policies are offended; the officer's report, as poorly executed as it is, offers no clear guidance. In discussions with the Council, when discussing the precedent of the adjacent development at Garden Square and Gardenia Close, such comments as "it was an experiment of its time"⁹ and "it was judged against a different policy background"¹⁰ have been made. Forest Gardens, Rendlesham is also a design/layout precedent (Google Streetview images and planning history documents appended to this Statement) and should be visited by the Inspector.

4.28 We will demonstrate that the policy which saw Garden Square and Gardenia Closer approved (former saved policy AP19) is practically identical to the adopted policy (DM21) against which 19/1499 was refused. We will argue that if the dwellings on Garden Square and Gardenia Close were permissible (even at much closer separation distances) and not offensive to policy the appeal proposals (which have generally greater separation distances between dwellings) should also be permissible. The appellant can find no explanation for the Council's lack of consistency in this respect. RfR1 and the officer's report provides no indication that the Council has 'grasped the nettle' on this key issue.

4.29 We will be challenging the Council to explain why it reached a different conclusion on a materially similar proposal assessed against materially similar policy tests and what policy or new material consideration justifies it.

Reason for Refusal 2 Housing Mix and Affordable Housing

4.30 Reason for Refusal no.2 appears to have been written at an early stage in the Council's determination process and appears to pre-date the provision of information submitted to the Council before it formally determined the application. For example, the reason for refusal states "no information within the application as to which units are proposed as affordable units". This is incorrect.

⁹ Major Projects Officer

¹⁰ Area Planning Officer

- 4.31 The Economic Viability Assessment described the house types which were intended to be affordable and by cross referencing with the site layout plan it was possible to identify their location. If the Council were unclear, they could have asked at an early stage.
- 4.32 The 'affordable housing locations plan' was provided on 12th June 2019 in the form of a plan appended to the draft s106 showing the locations of the affordable housing units and it was in response to a request for that information from the planning officer (email of 21st May 2019).
- 4.33 The Council's refusal notice states that "there is no information and justification provided that this scheme will provide an appropriate level and tenure of affordable housing". The officer's report also states that "The proposal is not considered to be in conformity with Policy SP3 and DM2 due to the lack of information that has been submitted to the Local Planning Authority". Both statements are incorrect; information was provided in the following places:
- Planning Statement paragraph 3.35: *"the applicants have moved towards the council's request by offering the full 33% provision of affordable housing (25 units) and by offering a mix of 48% affordable rented (12 units) and 52% discounted market sales (13 units)."*
 - Planning Statement paragraph 6.30: *"This planning application proposes 33% affordable housing which far exceeds the evidenced affordable housing need of 24% set out in Paragraph 2.12 of the supporting text to policy DM2 and this needs to be recognised by the local planning authority in its decision making. It is important to note that a proposal for "approximately 50 units" would have generated approximately 17 affordable housing units at a rate of 33%. It is a material consideration in favour of this development proposal that 33% of 75 delivers more affordable housing at 25 units".*
 - Planning Statement paragraph 6.56: *"Policy SSP12 requires the provision of affordable housing. The planning application proposes 33% affordable housing (25 units) consisting of 48% affordable rented (12 units) and 52% Discounted Market Sales (13 units) in compliance with policy DM2".*
 - Table in Planning Statement paragraph 6.68.
 - Planning Statement paragraph 6.75 'Benefits versus impacts' bullet point 6.

- Planning Statement paragraph 6.90: *“The supporting text acknowledges that for Rendlesham, affordable housing “is expected to be provided through SCDC’s policy DM2”. This proposal provides 33% affordable housing in compliance with policy DM2”.*
- Planning Statement paragraph 6.98: *“Emerging local plan policy SCLP5.9 requires affordable housing of 33% which matches the offer in this planning application”.*
- Planning statement paragraph 7.4 ‘Heads of Terms advised by Birketts Solicitors’ under the sub heading ‘Affordable Housing’: *“Affordable Housing of 33% or 25 units: • 12 homes or 48% for build to rent (affordable private rent – 20% rent discount relative to local market rents inclusive of service charge and lifetime tenancies); and • 13 homes or 52% for discounted market sale”.*
- Draft s106 agreement, definitions: *“that part of the Development comprising twelve (12) Affordable Private Rented Units and thirteen (13) Discounted Market Sale Units as shown on the Affordable Housing Locations Plan” as well as numerous other references in the draft s106 agreement.*

4.34 The Council also claim that no justification has been provided “that the very bespoke design approach is likely to be attractive as housing to Registered Providers if secured by s106”. This raises two points:

- The first being that the planning officer need only have asked at any point during the determination of the planning application and information such as that provided in Appendix 6 would have been provided.
- Secondly, even if the applicant had not tested the attractiveness of his units to registered providers, the fact that the applicant was willing to enter into a s106 and be bound by it should have been sufficient for the Council to conclude that there was indeed ‘justification’ for the provision of affordable housing. There is no ‘requirement’ in policy DM2 to demonstrate ‘willingness’ from providers, although DM2 does state “The District Council will need to be satisfied as to the adequacy of arrangements to ensure that these homes are offered to local people who can demonstrate need, at a price which they can afford, and that its enjoyment is by successive, as well as initial, occupiers”. The Appellant contends this infers the adequacy of the technical arrangements in the s106.

- 4.35 The s106 agreement was drafted by Birketts Solicitors and provides industry standard provisions for the marketing of the affordable homes and the controls over the identities of the landlord(s). No response was received on the draft s106 from the Council. The Appellant looks forward to the Council engaging with him on the content and approach of the draft s106 after the submission of this planning appeal.
- 4.36 The Council then goes on to claim that the proposal does not meet the requirements of policies SP3 and DM2. DM2 is dealt with above in terms of level of provision. However, in addition policy DM2 states that “The District Council will need to be satisfied as to the adequacy of arrangements”. The draft s106 was prepared by Birketts Solicitors and provided industry-standard affordable housing provisions that in any other circumstance would be considered adequate by a Council. In this case, probably because the reason for refusal was written at an early stage, the Council has provided no feedback on the draft s106, its adequacy or otherwise.
- 4.37 Policy SP3 is a strategic policy that talks of “strategies” and “general rules” in terms of housing mix across the whole district. Insofar as SP3 is concerned, a wealth of information was provided in the Planning Statement as to how the proposal met the ‘general rules’ in Table 3.6 of the Core Strategy – see Planning Statement paragraphs 3.24 to 3.30. The application of policy SP3 to this reason for refusal is flawed. The proposal’s compliance with SP3 and its supporting text and table 3.6 has been demonstrated in the Planning Statement.

Reason for Refusal 3 Safe and Socially Inclusive Development

- 4.38 RfR3 is predominantly an outline of policies. Only the last sentence gives a view on the performance of the development against development plan policy. RfR3 refers to a “number of elements” without being clear as to what these are.
- 4.39 The Council’s RfR3 cites policies DM21 and DM22. As set out in relation to RfR1 above these policies are for practical purposes identical to the old saved policy AP19 against which the development at Garden Square and Gardenia Close was found to be permissible (Appendix 7). That was a strong material consideration not properly considered by the Council in its assessment of 19/1499 and no explanation has been given for the divergence of approach.
- 4.40 RfR3 also refers to NPPF paragraphs 127 and 129. Paragraph 127 relates to the function

and character of developments and 129 tells Councils to “make appropriate use of, tools [...] such as Building for Life” (our emphasis).

- 4.41 The Council made no reference to Building for Life at any point in the pre-app 17/5049 of November 2017, the full planning application 18/2374 of June 2018, the refusal of 18/2374 in September 2018, or the pre-app 18/4778 of November 2018. The Council mentioned Building for Life for the first time in June 2019.
- 4.42 Notwithstanding the Council’s last-minute employment of Building for Life as a basis for refusal, the appellant has provided an independent assessment by an accredited BFL assessor (appended to this Statement) of the proposed development against the Building for Life recommendations. This exercise also explains the appropriate use of Building for Life in the development management context.
- 4.43 We will demonstrate that the Council has used Building for Life inappropriately and given it primacy over development plan considerations. Notwithstanding this, the appellant has commented on the paragraphs in the officer’s report regarding the 12 BfL headings (see Appendix 9).
- 4.44 As discussed in relation to RfR1 above, by introducing Building for Life in an inappropriate manner and at a very late stage, it is the appellant’s contention that the Council are attempting to side-step the fact that the adjacent development at Garden Square and Gardenia Close was approved against practically identical policy tests (Appendix 7).
- 4.45 RfR3 is preoccupied by safety. As was its predecessor reason for refusal in 18/2374 (Appendix 8). In the Planning Statement (paragraph 3.55 and Appendix 2) we have demonstrated that the adjacent development at Garden Square and Gardenia Close (a comparable design and layout) is perfectly safe and we submitted evidence and data that should have given the Council sufficient comfort to satisfy their concerns on this matter. That data was a material consideration not properly understood by the Council. Moreover, the Gardenia Square and Gardenia Close developments have given rise to successful and safe communities.
- 4.46 As with the previous refusal 18/2374 the LPA provide no real evidence that the development would not be socially inclusive. The Planning Statement pre-empted this unhealthy pre-occupation and covered the matter in its paragraphs 3.15 to 3.24.
- 4.47 The LPA confirm their inability to let go of the matter in the officer’s report where it states: “Therefore the application is being recommended for refusal on the matter of

design and function, also the development not being for the open market and therefore not socially inclusive". The Appellant has told the LPA multiple times that the houses are for the open market and will be marketed in the usual way through relevant agencies and to the general public.

4.48 RfR3 states that "The development includes a number of elements of poor design, in that it fails to create well laid out streets and its layout would create features, barriers and exposed spaces and boundaries which would not form a safe and socially interactive development".

4.49 The proposed development is an extension of the existing, successful development on Garden Square and Gardenia Close, which is generally admired by residents and visitors to Rendlesham. It is described positively in Appendix N of the Rendlesham Neighbourhood Plan which divides the village into 8 residential neighbourhoods.

4.50 The design of the proposed development does accord with local plan policies as did the previous neighbouring development at Garden Square and Gardenia Close, as demonstrated in detail in Section 6 of the Planning Statement, ref paragraphs 6.1 to 6.113, and the LPA should not use design as a reason to object to development.

4.51 In their consultation response of 16 May 2019, the Rendlesham Parish Council write: The street scene meets the RNP criteria in providing the ideal street scene.

4.52 Policy DM21 deals with aesthetics and design generally. Here it is the site layout that is in dispute, not design generally. In paragraph 51 above the LPA have conceded that individually the external appearance of the buildings and their internal layouts are acceptable ...

4.53 The LPA finds issue with the site layout, orientation, and position of the dwellings. However, if one analyses each point one by one, there is simply no basis for this negative assertion. The design of the proposed development does meet the criteria in Policy DM21. It does establish a strong sense of place, and it does use street scenes and buildings to create attractive and comfortable places to live, work, and visit. The existing development on Garden Square and Gardenia Close gives testimony to this.

4.54 *...function and quality...* the neighbouring development, to which this is an extension of, functions well, has lower crime levels than other parts of Rendlesham and has a very high overall quality.

- 4.55 *...sympathetic to local character...*the dwellings, by echoing the approved development next door, are sympathetic to local character.
- 4.56 *...a strong sense of place...*it would be irrational to think the development does not establish a strong sense of place – this is recognized in Appendix O of the neighbourhood plan.
- 4.57 *...high standard of amenity...*the proposals have a far higher standard of amenity than many other new developments elsewhere in Rendlesham – something recognised by the Parish Council in their consultation response and in their neighbourhood plan.
- 4.58 *...crime and quality of life...*the facts show that crime levels in the adjacent Garden Square and Gardenia Close are lower than the rest of Rendlesham.

Reason for Refusal 4 Odour Assessment

- 4.59 In respect of RfR4 we would remind the Inspector of our comments made above between paragraphs 2.09 to 2.20.
- 4.60 In this case the Council is claiming that “it was not possible to determine that there will be no effects on residents which adversely affect their amenity and the effectiveness of the current extent of cordon sanitaire around the sewage treatment plant”.
- 4.61 This reason for refusal is without foundation. The Council was at liberty to ask for clarification during the planning application. The Council has acted unreasonably by advancing this reason for refusal without attempting to reconcile their concerns, and if the Council does not retreat from it, it will be the subject of a costs application.
- 4.62 The odour assessment of May 2018 was based on a sound methodology and its only shortcoming was that it included a previous layout drawing in Figure 1, page 5. This was only for information; the odour assessment took 4 receptor locations on the undeveloped field in Table 3, page 12.
- 4.63 The proposed development had been designed from the start to observe the cordon sanitaire and this can be seen simply by putting the two versions¹¹ side by side and illustrating where the cordon sanitaire would be:

¹¹ Using the site masterplan in the May 2018 odour assessment and the site masterplan in the September 2019 odour assessment.



www.parkerplanningservices.co.uk

bullet point¹².

- 4.65 This reason for refusal is therefore satisfied and we would welcome the Council conceding it through the Statement of Common Ground.

Reason for Refusal 5 Residential Amenity

- 4.66 RfR5 is not clear, contrary to the DMPO 2010¹³. It gives several generalised comments about spaces, distances and views without being specific to where these relate to. It only gives one named example; Plot 15.
- 4.67 As explained during the second pre-application (Planning Statement paragraph 3.59), Plot 15 is a special case. It is one of four Bealings that 'frame' the Maharishi Peace Palace. The other three are already built. They are 1-2, 3-4, and 5-6 Peace Palace Gardens. The Bealings on Plot 15 will complete the symmetry. This determines its position. There are existing trees to the south and west of Plot 15 to reduce overlooking from those directions. Plot 17 is a Deben bungalow, so there are no first floor or second floor windows that would overlook Plot 15. Plot 16 is a Woodbridge, but it is at an angle to Plot 15. The three existing Bealings at 1-2, 3-4, and 5-6 Peace Palace Gardens exhibit the same layout as Plot 15, but were considered acceptable against local plan policy by the LPA.
- 4.68 The RfR also states that "there are a number of significant adverse impacts upon residential amenity" without identifying them. The RfR then extrapolates this into a reason for refusal of the entire scheme. The officer's report provides no information clearly relatable to this reason for refusal. Notwithstanding this, a detailed response to matters in the officer's report assumed to relate to this issue has been included with this Statement of Case (Appendix 9). For the purposes of this Statement of Case we, nonetheless, turn to some of the matters from the officer's report (italicised text) which are assumed to relate to RfR5:
- 4.69 **Q:** *Due to the close proximity of the properties and their scale, with windows on all elevations of the building there will be overlooking between properties. Which are detailed below, some of the properties are staggered, so there will not be direct overlooking, but it would be close enough to cause concern at the overlooking between properties:*

¹² In so far as that policy requirement remains legitimate.

¹³ Sections 35.(1)(b) and (2) of the Development Management Procedure Act 2010 (as amended).

4.70 **Q:** *Plot 2 and Plot 3 – 7 m separation distance between 3rd bedroom looking into 2nd bedroom on the first floor. The 5th bedroom looks into 3rd bedroom, these are the only main windows into the room, the rest of the windows are rooflights.*

4.71 **A:** The north elevation of Plot 2 (Woodbridge) will face the south elevation of Plot 3 (Glemham). However, the north elevation of the Woodbridge has narrow 0.5 m windows on the first and second floors. The south elevation of the Glemham has a 0.5 m window on the first floor and a 1 m wide window on the second floor. In the rooms that face each other, there are other windows and rooflights on the east or west, so the occupants are not reliant on the windows that overlook or are overlooked:

- Bedroom 5 on the second floor of the Woodbridge has a rooflight on the east and a roof lantern.
- Bedroom 3 on the first floor of the Woodbridge has its main 1 m wide window on the east.
- Bedroom 3 on the second floor of the Glemham has two rooflights on the east and west.
- Bedroom 2 on the first floor of the Glemham has its main 1 m wide window to the east.

4.72 **Q:** *Plot 4 and Plot 5 - 5m separation distance between the properties, bedroom 5 will look into the bathroom on the 2nd floor, otherwise this room just has rooflights.*

4.73 **A:** The north elevation of Plot 4 (Woodbridge) will face the south elevation of Plot 5 (Framlingham). Both the Woodbridge and the Framlingham have narrow 0.5 m windows on the first and second floors on these elevations. Also, in the rooms that face each other, there are other windows and rooflights on the east or west, so the occupants are not reliant on the windows that overlook or are overlooked:

- Bedroom 5 on the second floor of the Woodbridge has a rooflight on the east and a roof lantern.
- Bedroom 3 on the first floor of the Woodbridge has its main 1 m wide window on the east.

- The room on the second floor of the Framlingham is a bathroom with frosted glass.
- Bedroom 1 on the first floor of the Framlingham has two 1 m wide windows on the east and west.

4.74 **Q:** *Plot 5 and Plot 6 - 7m separation distance between dwellings, 1st floor plot 5 bedroom 2 will look into bedroom 1 of plot 6. On the 2nd floor there will be looking between bedroom 3 and bedroom 4.*

4.75 **A:** The north elevation of Plot 5 (Framlingham) will face the south elevation of Plot 6 (Woodbridge). The north elevation of the Framlingham has two narrow 0.5 m windows on the first and second floors. The south elevation of the Woodbridge has a 0.5 m window on the first floor and a half-moon window set at 1.7 m cill height on the second floor. In the rooms that face each other, there are other windows and rooflights on the east or west:

- Bedroom 3 on the second floor of the Framlingham has a rooflight on the west.
- Bedroom 2 on the first floor of the Framlingham has two 1 m wide windows on the east and west.
- Bedroom 4 on the second floor of the Woodbridge has two rooflights on the east and west.
- Bedroom 1 on the first floor of the Woodbridge has its main 1 m wide window on the west.

4.76 **Q:** *Plot 6 and Plot 7 - 5m separation distance, the third bedroom will look into the dining room, which are both on their respective 1st floors.*

4.77 **A:** The north elevation of Plot 6 (Woodbridge) will face the south elevation of Plot 7 (Bealings). The north elevation of the Woodbridge has two 0.5 m windows on the first and second floors. The south elevation of the Bealings has a 1 m window on the first floor and two rooflights on the second floor. In the rooms that face each other, there are other windows and rooflights on the east or west:

- Bedroom 5 on the second floor of the Woodbridge has a rooflight on the east and a roof lantern.
- Bedroom 3 on the first floor of the Woodbridge has its main 1 m wide window on the

east.

- Bedroom 2 on the second floor of the Bealings has a dormer window to the west and a roof lantern.
- The open plan kitchen/dining/living room on the first floor of the Bealings has two 1 m wide windows on the east and west.

4.78 **Q:** *Plot 8 and Plot 9 - Plot 8 is a bungalow, which is separated from plot 9 by a 2m high fence. There are windows on the north elevation which are 2m from the ground, which will therefore look straight over the fence into the amenity space on Plot 9. Due to their height, as they are above 1.7m, there would be no direct overlooking but perceived overlooking instead.*

4.79 **A:** The north elevation of Plot 8 (Bramfield) will face the south elevation of Plot 9 (Woodbridge). The Bramfield is a bungalow and is separated from the Woodbridge on Plot 9 by a 2 m high fence.

4.80 **Q:** *Plot 9 to Plot 10 - there is 5m between the 1st floor bedroom 1 and the 3rd bedroom, on the 2nd floor there will be looking between bedroom 5 and a bathroom on the adjoining plot.*

4.81 **A:** This is the same as Plots 4 and 5. The north elevation of Plot 9 (Woodbridge) will face the south elevation of Plot 10 (Framlingham).

4.82 **Q:** *Plot 23 and Plot 24 - There is 5m separation distance. There will be overlooking between the 2nd floor bedroom 3 and bedroom 4, these are the only windows, otherwise there are just rooflights.*

4.83 **A:** This is the same as Plots 5 and 6 above. The north elevation of Plot 24 (Framlingham) will face the south elevation of Plot 23 (Woodbridge).

4.84 **Q:** *Plot 27 and Plot 28 - There is a 5m separation distance, on the first-floor bedroom 1 will look into bedroom 3, on the 2nd floor bedroom 5 will look into a bathroom.*

4.85 **A:** This is the same as Plots 4 and 5 and Plots 9 and 10 above. The north elevation of Plot 28 (Woodbridge) will face the south elevation of Plot 27 (Framlingham).

4.86 **Q:** *The Wilby style dwelling is proposed to have a flat on the 3rd floor, which is only served by rooflights and two dormer windows (these do not serve habitable spaces), this is not a*

positive outlook for the future residents of this dwelling. This type of dwellings is on plots 18, 19, 34 and 35. Which is not acceptable.

- 4.87 **A:** The second-floor apartment in the Wilby has 5 rooflights and two dormer windows. This is a very positive outlook for future residents.
- 4.88 The LPA raised some concerns in September 2018 in the refusal of the first application, ref DC/18/2374/FUL. The Appellant addressed these concerns in the second pre-application of November 2018 and substantially revised the scheme and the site layout. The LPA appeared to accept these revisions and did not repeat these concerns in their final pre-application advice of 26 February 2019, ref Planning Statement, Appendix 1f.
- 4.89 Section 3.0 of the Planning Statement gives the Appellant's replies to the reasons for refusal of the first application and shows where the Appellant has found common ground with the LPA in the second pre-application. Paragraphs 3.57 to 3.85 directly relate to the previous concerns with residential amenity.
- 4.90 Information was provided with the planning application 19/1499 (Appendix 5 of the Planning Statement) to show how the proposed development provided greater separation distances between properties than had been deemed acceptable by the Council on the neighbouring development. It is the appellant's position that the Council has not given this matter sufficient weight in their decision making.
- 4.91 If, as the Council claim, there were a small number of instances where the site-specific relationships between dwellings and spaces needed attention it could have been dealt with by the imposition of a condition as required by NPPF Paragraph 54. An example in this case could have been the imposition of a hard and soft landscaping scheme to include boundary treatments. This would have overcome the Council's concerns about Plot 15 for example; the only clear and specific example given by the Council in the reason for refusal.
- 4.92 RfR5 concerns residential amenity and the impact of development on existing and future residents.
- 4.93 The design is the preferred design of the applicant and is successful even if it departs from more common standards. This "departure" does not give rise to unacceptable impacts on living conditions (see appended BfL assessment by Mr. Garry Hall).
- 4.94 Policy DM23 lists matters to be considered in relation to residential amenity. It does not

rank them. The proposed dwellings conform to a design code which adds variation to the housing market. There is market demand for housing 'products' conforming to this code as demonstrated by the success of Garden Square and Gardenia Close. In this case purchasers place a premium on access to daylight and sunlight, property orientation and elegant and distinctive architecture. The residential amenity of the future occupants will not be unacceptably impacted.

- 4.95 We will demonstrate that the LPA have failed to weigh in the balance this key matter. Even if the development may appeal to persons who subscribe to a particular philosophy or lifestyle, it is not an exclusive development, and will serve to meet the housing needs of the District.

Reason for Refusal 6 Recreational Disturbance Avoidance and Mitigation (RAMS)

- 4.96 The Habitats Regulations Assessment was written by a highly experienced senior ecologist, Mr. Nicholas Sibbett of The Landscape Partnership Ltd and formerly of Natural England. Mr. Sibbett has previously been instructed to work for the Council to write the Core Strategy Appropriate Assessment. The Appellant's response to this reason for refusal has been prepared jointly with Mr. Sibbett.
- 4.97 The officer's report raises a concern that the potential odour impact from the Water Recycling Centre could mean that the open space area would not be effectively used and therefore its value for HRA mitigation is in doubt. The May 2018 and September 2019 odour assessments show that the odour levels are many times lower than levels which could cause nuisance and therefore highly unlikely to offend users of the open space.
- 4.98 The appellant pro-actively submitted the draft heads of terms and a draft s106. The on-site open space mitigation and off-site mitigation (financial contribution) would have been secured if the Council had shown willingness to participate.
- 4.99 Suffolk Wildlife Trust responded to the public consultation and were content with the HRA.
- 4.100 We note that the Council's own ecology officer directed the planning case officer to secure the RAMS contribution and consult Natural England: "In addition to the above, Natural England should be consulted on this application for their advice on the greenspace provision and HRA. Happy to discuss the above further and if you have any other queries please let me know".

4.101 The Council's ecology officer refers in his consultation response to the need for a 2.7km walking route to provide alternative SANGs provision to offset habitats impact. This is a misunderstanding of the HRA. The submitted HRA made clear that a sizeable area of public open space was provided onsite for the immediate needs of the future inhabitants of the development.

4.102 It also made clear that there were no European sites within a reasonable walking distance of the site. In recognising that dog walkers in particular, potentially unsatisfied with onsite provision, may wish to find a larger green space site than can be catered for locally, the RAMS payment covers this potential impact on European sites. On this basis there is no need to provide a walking route (which might otherwise be needed within a SANG) because there is no European site in reasonable walking distance of the development.

4.103 In this appeal it is incumbent on the Council to demonstrate why the combination of onsite open space and offsite contributions is not sufficient to conclude 'no likely significant effects' on European sites.

4.104 In addition to the above we would remind the Inspector of paragraphs 3.14 to 3.16 above in relation to the Council's **failure to exercise its legal duty** under Regulation 63(3) of The Conservation of Habitats and Species Regulations 2017 ("The Habitats Regulations"), as the competent authority, to consult Natural England for the purposes of its assessment.

4.105 There is significant doubt that the five paragraphs in the planning officer's Report for Delegated Planning Application (undated) is of sufficient quality to consist of a legally valid Habitats Regulations Assessment, as it provides very little substantive evidence to support its assertions.

4.106 Furthermore, we cannot find in the adopted Local Plan or the emerging Local Plan any policy to support the planning officers assertion that this on site mitigation (2.7km walk) is necessary for developments over 50 dwellings within the Zone of Influence in addition to strategic mitigation in the form of a RAMS contribution'¹⁴. In fact, the Hampshire County Council document that the Council's ecology officer relies on concerned the much larger Whitehill and Bordon development project; an expansion of a population of 14,000 to 23,000. Rendlesham is only approximately 3,000 in total.

4.107 The requirement to 'make an appropriate assessment of the implications of the plan or

¹⁴ The Council's ecology officer references a Hampshire County Council guidance document: <https://documents.hants.gov.uk/ccbs/countryside/planningfordogownership.pdf>

project of that site in view of that site's conservation objectives' appears to be absent as no conservation objectives are mentioned. We consider that if the Council had properly completed a Habitats Regulations Assessment and had consulted Natural England, as it is legally required to do, the conclusions of that assessment would not have resulted in a refusal.

4.108 The site is allocated in the emerging Local Plan as Policy SCLP12.62: Land West of Garden Square Rendlesham. The Suffolk Coastal District Local Plan HRA Supplementary Note (July 2019) submitted to the Local Plan Examination in Public includes this allocation as being in the 1km to 13km category, which has recreation pressure as the only impact pathway for which only the RAMs payment is required to provide strategic mitigation for in-combination effect arising from recreation pressure. The refusal on the grounds of no 2.7km walk being available is therefore not derived from that document.

4.109 As set out above, the Appellant is keen to ensure the Council's oversight is dealt with and has instructed his ecology consultant to consult with Natural England for their overview of the HRA; the purpose being to conclude the matter for the Inspector's benefit before a decision is made on the appeal.

Reason for Refusal 7 Accommodating the Sewers

4.110 In respect of RfR7 we would remind the Inspector of our comments made above between paragraphs 2.09 to 2.20.

4.111 Strategic policy SSP12 includes a criterion requiring that development "Accommodate the sewers that cross the site".

4.112 The criterion requires the applicants to accommodate the sewers, not to 'demonstrate' how this will be done: - this is the purpose of a strategic policy (as distinct to a development management policy); to guide developers in forming their proposals.

4.113 The submitted Flood Risk Assessment of May 2018 includes extensive description of the existing sewers (FRA Appendix F) and also refers to the need to divert the existing surface water sewer (paragraph 3.2.7). The appellant was perfectly aware of their presence and the need to accommodate them.

4.114 The submitted Planning Statement stated *"6.53 Policy SSP12 requires development to accommodate the sewers that cross the site. The layout has accommodated the sewers at*

significant expense to the applicants and includes proposals to realign them. The necessary survey work has been undertaken to ensure this will be achieved without detriment to the existing sewer system.”

4.115 If the Council needed additional comfort, beyond the requirements of their policy, it could have requested additional information. In that event the appellant would have happily acceded to that request and would have provided the Section 185 sewer diversion application and drawings that were submitted to Anglian Water on 28th May 2019 – see Appendix 10.

4.116 This reason for refusal is without foundation. The Council was at liberty to ask for clarification during the planning application. The Council has acted unreasonably by advancing this reason for refusal without attempting to reconcile their concerns, and if the Council does not retreat from it, it will be the subject of a costs application.

Reason for Refusal 8 Planning Obligations

4.117 Reason for Refusal no.8 is a ‘standard’ reason for refusal and is capable of resolution by the provision of an appropriate and concluded legal agreement which the appellant has always been willing to provide (reference the draft Heads of Terms section of the Planning Statement) and the draft Section 106 Agreement of 12th June 2019. This is acknowledged by the Council in the middle unnumbered paragraph of the unnumbered 36th page of the officer’s report: “the draft s106 is noted but due to the other issues with this application it cannot be progressed...”.

4.118 As the Council refused to seek or agree to the proposition of an extension of time to discuss matters, it remained in draft form. Since the Council did not give any feedback to the draft heads of terms in the Planning Statement, the appellant could not submit the draft legal agreement for further discussion and negotiations with the Council until after the consultation stage.

4.119 The Appellant looks forward to the Council engaging with him to provide a finished legal agreement which satisfies the CIL and NPPF tests. If the Council engages with the appellant in progressing the draft legal agreement, this reason for refusal can be satisfactorily addressed prior to the Appeal Inquiry.

5.0 Responses to 3rd Party Representations

East Suffolk Housing Dept.

- 5.1 In the public consultation the East Suffolk Head of Housing stated that “The amount of affordable housing to be provided is acceptable however, there needs to be more detail on the type and tenure”.
- 5.2 The appellant requests that the Council sets out in the Statement of Common Ground whether this is still a requirement of the Head of Housing.

Suffolk Wildlife Trust

- 5.3 In the public consultation Suffolk Wildlife Trust stated that *“The submitted ecological survey report (Basecology, March 2018) and the Habitats Regulations Assessment (The Landscape Partnership, March 2019) are acceptable. If the application is granted, then a further walkover survey for badgers should be undertaken prior to works commencing. A condition is to be applied to the application to ensure that all recommendations are implemented in full”*. The appellant is content with this proposed condition.

Suffolk Police

- 5.4 Suffolk Police Design Out Crime Officer objected to the planning application but it is noted that the officer confirmed *“The updated Design Access Statement mentions a crime analysis of the area [the adjacent Garden Square and Gardenia Close] under paras 3.37-3.40, outlining that crime is low in the area. It is true that crime levels when compared to other areas are reasonably low”*.

Suffolk County Council Development Contributions Manager

- 5.5 Suffolk County Council S106 Officer responded to the public consultation and stated that “Monies are required and detailed in the consultation response setting out their expectations in terms of CIL bidding process”.
- 5.6 Correspondence with the County Council were undertaken in May 2019, but Suffolk County

Council did not respond to the final email in the trail (Appendix 11). Because inconsistencies were raised by the appellant it will be necessary for the matters to be concluded and the draft s106 updated if necessary.

East Suffolk Planning Policy

- 5.7 The Council's policy department provided a response on the planning application.
- 5.8 The list of relevant development policies was incomplete with the crucial policy SP2 and its status omitted thus misinforming the case officer.
- 5.9 The policy response mentions the 'limiting factors' which saw the allocation reduced from 75 to 50 dwellings but fails to mention the representations that have been made on the local plan since 2018 dealing with that precise issue.
- 5.10 The policy response acknowledges that if education and transport limitations are overcome that the number of dwellings can be revisited.
- 5.11 The policy response claims that a proposal for more than 50 dwellings would be contrary to policy. This is utterly incorrect and displays a fundamental misunderstanding of planning policy matters.
- 5.12 The policy response refers to 'Principles' in the neighbourhood plan but fails to acknowledge the difference in status between policies, objectives and supporting text.

Rendlesham Parish Council

- 5.13 The Rendlesham Neighbourhood Plan states (our emphasis):

"Housing Growth

*10.01 There are existing determining factors that identify Rendlesham as an area for further growth. An **existing allocation in the SCLP** (Fig 35), allocation as a Key Service Centre, designation as a District Centre; both contained within the SCCS. Whilst the draft RNP initially sought to take this, and other sites forward, it has been identified through the Regulation 14 Pre-Submission consultation that, in order to work with SCDC in their 5-year housing land supply, and SCC with their areas of responsibilities, **the key tool for taking forward sites for development will be the SCLP**. The objectives and information within the RNP will guide SCDC, SCC and developers on housing density, land use, design and the*

infrastructure required to support the increase in population by reflecting the aspirations of the residents of Rendlesham. Having a Plan that looks at the future of the parish as a whole will ensure that the quality of life for those who live and work here will be not only maintained but improved to address the shortfalls that currently exist.

10.02 RPC, through the RNP, will work with SCDC on the outstanding site allocation. Under existing policy DM1, one third of the housing is expected to be 'affordable housing'

*10.03 **The RNP is not a tool to say no to housing**, it is a tool to ensure that future housing growth is sustainable and has the infrastructure to support a growing community as reflected in Objective 1 of this NP".*

5.14 Rendlesham Parish Council provided their consultation response in May 2019. It included a range of points for and against the proposal and objected having balanced these. The following is a summarised response to those matters and how, if some are answered/corrected, the outcome of the balancing exercise may well be different.

5.15 The consultation response refers to the application meeting or otherwise "criteria of the Rendlesham Neighbourhood Plan". The 'criteria' referred to are an assortment of policies, objectives and supporting paragraphs which lessening relevance to decision making from the policies down to the supporting paragraphs. Whilst the Parish Council's objection attempts to take a balanced approach, it has not weighed the 'status' of the 'criteria' into the balance. I.e. it would potentially a conflict with a supporting paragraph (less important) against a conflict with a policy (more important) and present or weight the conflicts as equally important; which they are not.

5.16 Point 1 – against RNP Objective 3a 'Type and Design' the Parish Council's point about the proposal being weighted on large properties is not correct; there was a mix of bedroom numbers as set out in the submitted Planning Statement. The application had progressed a plan for affordable housing through the draft heads of terms in the Planning Statement and the draft s106 submitted in June 2019. The transport assessment was not restricted to a particular lifestyle, rather it logically assumed that the prospective purchases of this market product would be similar to the occupiers of the existing development and rightly used this as a baseline to assess highways impacts; an approach accepted by the County Highways Authority. Against point 1 the Parish Council have arrayed supporting paragraphs and no planning policies, **some of the points made are incorrect.**

5.17 Point 2 – is concerned only with supporting paragraph 10.12 and no objective or policy.

- Point 2 concerns affordable housing and states that “there is no mention of this in the current application”. As above, **this is incorrect**.
- 5.18 Point 3 – in relation to RNP Objective 3b Density the Parish Council are content that the **proposals meet the neighbourhood plan** and in doing so refers to Appendix O where the existing development at Garden Square is described as one of the existing character areas in Rendlesham.
- 5.19 Point 4 – the Parish Council reference supporting paragraph 10.16 in relation to off-road parking and state that there is “sufficient off-road parking. **The application meets the RNP**”.
- 5.20 Point 5 – in relation to supporting paragraph 10.18 the Parish Council conclude “the proposals incorporate open green spaces and **the application meets the RNP**”.
- 5.21 Point 6 – against Objective 3c Street Scene the Parish Council state that “**the street scene meets the RNP criteria in providing the ideal street scene. The application meets the above criteria in the RNP**”.
- 5.22 Point 7 – in reference to support paragraph 10.21 ‘Road Layout’ the Parish Council conclude that “the application meets the above criteria in the RNP by providing a positive street scene”.
- 5.23 Point 8 – in reference to supporting paragraph 10.22 the Parish Council conclude that the proposed development “**has a good walking and cycling infrastructure** and in that respect meets the criteria in the RNP”.
- 5.24 Point 9 – the Parish Council express concerns about what they term “less tangible infrastructure” and criticise the planning application for not providing it. It is not clear why this is the fault of the applicant; not least when the neighbourhood plan states that “Service providers need to ensure that [less tangible infrastructure] provision is commensurate with the growing population”. The development will provide for the infrastructure it is required to do through appropriate planning mechanisms such as CIL. Reference is also made to making a tangible contribution to a licenced premises. This relates to paragraph 2.105 of the Site Allocations DPD and is a ‘suggestion’ associated with Site Allocation SSP13 not SSP12. The Parish Council do not explain what is meant by a ‘tangible contribution’ but any ‘contributions’ would need to meet the planning tests.
- 5.25 Point 10 – this point is important because it relates to the only neighbourhood plan policy

relevant to the planning application; RNPP3. The Parish Council stated that “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” and “this does not meet the RNP”. It is important to turn to RNPP3 which states “New residential or mixed-use development is required to make provision towards meeting identified local need for allotments, orchards and growing spaces”. RNPP3 expresses no preference as to which is provided. **The provision of orchard land in the planning application does conform to RNPP3.**

5.26 Of the 10 points above the following performance is noted:

‘Criteria’ in order of importance	Met?	Unmet or unclear?
Planning policy	1	0
Objective	2	1
Supporting text	4	2
Total	7	3

5.27 Under the heading ‘Other Considerations’ the Parish Council then list another 8 matters which they say remain unaddressed from the previous planning application 18/2374 and these are responded to below:

5.28 Point 1 – the parish council wanted all roads adopted. The County Highways Authority made no such requirement.

5.29 Point 2 – the Parish Council have questioned the commercial viability of the development because they are concerned about the time required to implement. However, there is no such requirement in planning, the emphasis being on starting, not completing.

5.30 Point 3 – the Parish Council want the affordable housing offered to local people only. The affordable housing will be offered to a registered provider and will be operated in the usual manner.

5.31 Point 4 – The parish council want a physical barrier to block the end of Tidy Road. Tidy Road has long been one of two accesses to the development site and residents of Tidy would/should have known this well. It will not be blocked up. The County Highways

Authority have raised no concerns about its use.

- 5.32 Point 5 – the Parish Council require construction traffic to be managed in line with the construction management plan submitted by the applicant.
- 5.33 Point 6 – the Parish Council makes a number of statements relating to flooding. This is dealt with in the FRA to the satisfaction of the Local Lead Flood Authority.
- 5.34 Point 7 – concerns about CIL and the increase from 50 to 75 dwellings however CIL increases proportionately with the number of dwellings.
- 5.35 Point 8 – the Parish Council require habitats and wildlife are not compromised. This is dealt with through the ecology report and habitats mitigation.

6.0 Conclusion

- 6.1 It is the appellant's contention that the determination of this proposal should have led to approval. It appears that the LPA has attempted to "reverse-engineer" the reasons for refusal associated with the first application 18/2374 without good and justifiable objective planning reasons. The proposal accords with the development plan and should be approved.
- 6.2 Even if it is found that the proposal does not ostensibly comply with SSP12, because of the number of houses proposed, this factor alone is clearly outweighed by the fact that the site can acceptably accommodate 75 dwellings and that such a course is absolutely in line with Govern Policy. Clearly, other planning considerations (the manifold benefits of the proposal) indicate that permission ought to be granted. Any other "harms" that might be identified could be no more than of minor significance.
- 6.3 If it is found that that the tilted balance applies, it is the appellant's case that there are no adverse impacts that individually or cumulatively outweigh the benefits of the proposed development.

Appendices

Appendix 1 LPA Email re Tilted Balance

Steven

From: Ben Woolnough <Ben.Woolnough@eastsuffolk.gov.uk>
Sent: 20 March 2018 11:20
To: Steven
Subject: RE: Latest SCDC appeals
Attachments: SCDC Bell Lane 2018 SoC Supplement 26.02.18.pdf

Hi Steven,

Very well thanks, busy as ever as at the final stages of issuing Adastral Park in the next week. Hope you and your family are also well.

You are obviously sensing what my head has been deep in lately!

Our current published HLS position is that of the 2017 HLSA, however this will be updated by the 2018 HLSA in mid June. That assessment will enable us to add in some approvals and allowed appeals over the past year (such as some the 560 approved at Candlet Road, Felixstowe).

It will also allow us to appraise what the up-to-date housing requirement position is. We have conceded that we cannot promote the 7,900 figure of the Core Strategy (495 dwellings per annum) as the requirement. This is due to SP2 of the Core Strategy being out of date due to us not commencing the review of the Core Strategy in 2015, therefore we accept that para 14 of the NPPF (tilted balance) is engaged irrespective of the 5 year supply position. However other policies are deemed to be up-to-date.

The alternative housing requirements are therefore:

- a. The 11,000 OAN of used for the Core Strategy (725 dpa), a very old OAN, based on the 2001 census and in our view, out-of-date if 7,900 is also deemed out-of-date.
- b. The OAN of the SHMA published last year which would have and may still inform the Local Plan review. This is a robust assessment across the full Housing Market Area of the 4 authorities including uplifts and it provides a reassuring annual requirement of 460 dpa, very close to the 7,900 annual requirement. This has now been subject to public consultation and the methodology is considered to be sound.
- c. The draft revised NPPF/Housing White Paper Standardised Methodology, which works out for us at 495 dpa. The likelihood is that we will need to use this for our Local Plan review.

appeals, our latest position is C. and we support this by the findings of the SHMA (b.) resulting in a similar annual requirement. This has yet to be tested in our current appeals. Whilst the Candlet Road appeal was dismissive of the SHMA, the SoS did not have the opportunity for full consideration of our SHMA position and we disagree with the position taken in that appeal which was influenced by an inquiry held in summer 2016. I was due to have an inquiry over the first week of May for an appeal in Melton when we were going to deal with HLS in detail, but it was withdrawn yesterday. The appellant did say that they have recognised a clear shift in the HLS position has influenced their withdrawal.

The next inquiry will be 26th June which is the re-determination of my Bell Lane appeal (300 homes). The original appeal was quashed due to a slightly basic approach on HLS from the inspector. Our supplement to the Statement of Case is attached and this sets out our position as summarised above.

So the simple answer is, yes we have a 5 year supply with both a 5% or 20% buffer.

Any queries, please feel free to call.

Kind regards

Ben

Appendix 2 19/1499 Planning Statement



March 2019

Planning, Design & Access Statement

Land off Garden Square,
Rendlesham

Norfolk Office 01603 516319

Orchard House
Hall Lane
East Tuddenham,
Norfolk, NR20 3LR

Suffolk Office 01284 336348

The Northgate Business Centre,
10 Northgate Street,
Bury St Edmunds,
Suffolk, IP33 1HQ

Essex Office 01245 934 184

Moulsham Mill,
Parkway,
Chelmsford
Essex, CM2 7PX

Key Information

Date of Application	March 2019
Site Address	Land off Garden Square, Rendlesham (SSP12)
Development Description	Development of 75 Dwellings
Local Planning Authority	East Suffolk Council
Applicant	Capital Community Developments Ltd.

Author: Steven Bainbridge MRTPI

Principal Planning Manager (Suffolk)

Reviewed By: Jason Parker

Director and Head of Planning

Report Revision:1

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8.0 Conclusion

Appendices

1.0 Introduction

- 1.1 This planning application is submitted on behalf of Capital Community Developments Ltd. and proposes the erection of 75 dwellings in Rendlesham. It has evolved from a planning application submitted in 2018 for a similar proposal but has benefitted from further pre-application engagement with the local planning authority. The applicants are residents of Rendlesham and have a proven track record in delivering development in Rendlesham which is important because delivery of housing is clear Government policy.
- 1.2 The intention is to develop houses and associated infrastructure which complement the village, with a range of development gains which will benefit the wider community.
- 1.3 The houses conform to specific architectural and design principles and perform very well environmentally; indeed, the Council's emerging local plan has policy aims which have moved towards the rationale behind proposal with increased focus on sustainable buildings, even the 'orientation of buildings'. The scheme is exceptionally well landscaped providing a high-quality built environment surpassing usual proposals.
- 1.4 The application site is identified in the existing and emerging local plans and has long been earmarked for housing development. Whilst the local plan currently allocates the site for approximately 50 houses¹ it has historically allocated the site for 75 houses. Government's objective is to boost housing supply and use land efficiently on sustainable sites.
- 1.5 The Council's local plan is clear that the allocations are contributing to a district-wide minimum housing requirement and that Rendlesham can likely accommodate more than the 100 dwellings currently allocated to it. It is essential then that decision makers and interested parties do not regard the 'approximately 50' figure as a cap limiting housing numbers but rather as a minimum to be exceeded where at all possible.
- 1.6 Pre-application advice from the LPA supports the contention that the site can accommodate 75 dwellings. The increase in houses proposed for this site from the minimum 50 to 75 has wider benefits to society including higher community infrastructure monies and higher proportions of affordable housing which will need to be given appropriate weight in the decision-making process as well as other development-generated benefits as summarised below.
- 1.7 This planning statement sets out how the proposed development complies with planning policies and is a sustainable development.

¹ It is material that this is a matter which is subject to objections ahead of the emerging local plan examination.

Key Development Statistics:

£700,000 The approximate amount of Community Infrastructure money which will pay for local infrastructure requirements; school spaces, healthcare capacity, roads, libraries etc.

£175,000 The proportion of the CIL money which will go to the Parish Council because they have a made neighbourhood plan (compared to the £105,000 if there wasn't a neighbourhood plan).

£600,000 The approximate amount of money generated by New Homes Bonus. Of which 80% goes to the local authority and 20% to the county council.

£15,000 The cost of a new solar-powered real time bus information screen (at the stop on Redwald Road opposite Sparrowscroft Road, assuming SCC requests this again)

£8,000 / 100m The approximate funds for a potential new bridleway which could eventually link the village with future rights of way around Rendlesham.

£1600 Monies secured for ecological mitigation under the Recreational Disturbance Avoidance & Mitigation Strategy
<https://www.eastsuffolk.gov.uk/planning/s106/habitat-mitigation/>

100+ The number of new dwellings which the Council's local plan says Rendlesham can accommodate between two sites in the coming years.

75 The number of new dwellings this planning application is proposing (on a site historically earmarked by the Council for 75 houses).

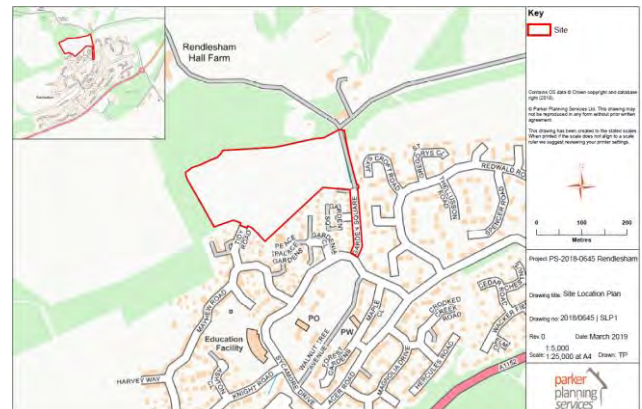
25 The number of new affordable homes (which is higher than the 17 that a development of 50 homes could have provided).

23dph The development density in dwellings per hectare (within the developable area of the site) which is favourable compared to others locally.

5 acres The approximate area of new public open space made up of formal gardens and orchards.

2.0 Site Location and Description

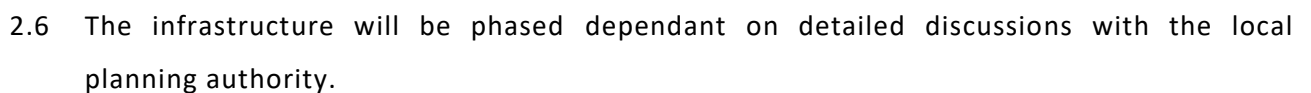
- 2.1 The site is shown on the submitted site location plan, a copy of which is shown here.
- 2.2 The site location plan shows the site's shape and extent and its location in Rendlesham and basic details of the neighbouring land uses; houses, woodland or agricultural land. As can be seen the site is located to the north of Rendlesham and is approximately 5 hectares in size. Vehicular and pedestrian access to the site will be via Tidy Road and Garden Square.



- 2.3 The site is relatively flat and bounded by woodland on the north and west boundaries and residential development on the east and south. Further to the north, beyond the woodland, the main land use is agricultural. Just to the north of the site is the sewage treatment plant which imposes a cordon sanitaire on the site limiting some of its development area,
- 2.4 The photograph below shows the site as it is now:



- Phase 1 Plots 1-7, 9-11, and 15-17
- Phase 2 Plots 8, 12, 14, and 18-25
- Phase 3 Plots 26-38



3.0 Response to the Previous Reasons for Refusal in the Context of Further Pre-Application Advice

Pre-application Advice Milestones

- 3.1 In June 2018 the applicants made an application for planning permission, ref DC/18/2374/FUL.
- 3.2 In September 2018 the local planning authority refused the application and listed 8 reasons for refusal.
- 3.3 In November 2018 the applicants made a request for pre-application advice, ref DC/PREAPP/18/4778. A copy of the cover letter is provided in Appendix 1. The applicants addressed the 8 reasons for refusal.
- 3.4 The applicants met with the LPA on 11 December 2018, and meeting notes were issued after the meeting on the 13th December 2018 and included action points agreed in the meeting.
- 3.5 The meeting notes were accepted by the local planning authority as shown in their email dated 19th December 2018.
- 3.6 The LPA gave their pre-application advice in two parts on 22 January 2019 and on 26 February 2019. Copies of the meeting notes and the pre-application advice received are provided in Appendix 1.
- 3.7 In the following paragraphs the pre-application advice is reviewed in the context of the 8 reasons for refusal.

Pre-application Advice Received in the Context of the Previous Reasons for Refusal

- 3.8 This section of the planning statement demonstrates where the applicants have found common ground with the local planning authority on the previous reasons for refusal with reference to the pre-application advice received and the officer's report and decision notice from the previous planning application, as relevant.

Reason for Refusal No.1: Dwelling Numbers

- 3.9 The previous application was refused in part because the local planning authority considered the proposed 75 dwellings to be an overdevelopment of the site contrary to local plan policies and by reference to an appeal in Kesgrave which majored on 5-year supply status at that time.
- 3.10 The previous planning did not advance or rely on 5-year housing supply arguments. This planning application takes the same approach.
- 3.11 Arguments have been made to the local planning authority during pre-app that:
- the Core Strategy housing figures (from which the Site Allocations figures derive) are minimums and not a cap on development
 - the previous planning application did not require there to be a lack of 5-year supply to be permissible
 - the 'additional' 25 dwellings above the allocation figure should be regarded as a windfall for which an allowance is made in the local plan
 - it is an efficient use of land
 - there is sufficient developable area within the allocated site and outside of the cordon sanitaire for around 100 dwellings at an acceptable development density of around 30 to 35 dwellings per hectare
 - due to the Council acknowledging their strategic housing numbers and distribution policy SP2 being out of date the 'tilted balance' approach should be taken to decision making.
- 3.12 The local planning authority now advise that; "more dwellings [than the approximately 50] may be acceptable if it can be proven that there is no adverse effect on the future and current residents of the site".
- 3.13 On the basis that it is common ground that 75 dwellings is not unacceptable in principle (but a matter to be decided against detailed design and amenity issues) but also in terms of the 'tilted balance' being properly applied and demonstrated to be so, the applicants have again proposed 75 dwellings and the justification for this is set out in the policy section below.

3.14 In support of this the applicants have provided additional plan-based information on separation distances, developable area and design responses (please see Appendix 5) to reduce the potential for overlooking or amenity issues and again this is discussed further below.

Reason for Refusal No.2 Open Market Status

3.15 The second reason for refusal noted “concerns” about the open market status of some of the houses and related this to general social objectives in policy SP1 and the NPPF in respect of sustainable communities. The previous planning application made clear that “The houses will be available on the open market for anyone wishing to buy homes of their particular specification, for which a waiting list already exists”.

3.16 The applicants have made clear their position that having a waiting list is no different to a developer selling plots ‘off-plan’ i.e. before planning permission is granted to people on a waiting list. It is the applicant’s opinion that this is a market-matter and not a planning matter. It is akin to a developer wishing to build bungalows to ‘Lifetime Homes’ standard with the clear and reasonable expectation that this will make them highly attractive to a particular part of the wider housing market; reducing his target audience through niche design is ‘developer’s prerogative’ and not a planning matter.

3.17 This has been agreed by the local planning authority (through the planning officer) during pre-app that “such a process lies outside the planning application process”.

3.18 No evidence was provided by the local planning authority to support the concerns (expressed by third parties and encompassed by the local planning authority in a reason for refusal) that the houses would not be available on the open market or any justification that this is even a proper planning matter. Indeed, the local planning authority has agreed (through the planning officer) that the ‘concerns’ “lie outside of the planning process” thereby acknowledging a basic planning principle that ‘concerns’ are not necessarily sound reasons for refusing planning permission.

3.19 Notwithstanding, the applicant has volunteered additional information through the pre-application process to allay those concerns and to assist the local planning authority in avoiding stepping into delicate territory which could raise issues of equalities and discrimination if not addressed carefully moving forwards.

- 3.20 It is the case that the residents of the existing housing at Garden Square and Gardenia Close hail from very diverse demographic and social backgrounds, and are engaged in a wide range of activities and organisations in the wider community and cannot and should not be 'branded' as a singular group, as "one community" as described in the previous officer's report.
- 3.21 In a telephone conversation with Parker Planning Services during the pre-application process a District Councillor described the residents of Garden Square and Gardenia Close as "those people". Members of the public who objected to the previous planning application used such terms as "closed community", "followers" and even "cult". These offensive and likely defamatory comments were uploaded to, and remain on, the Council's public website in breach of its standards.
- 3.22 The only 'commonality' the current and potential residents share is a market-orientated desire to own a home of a particular specification under-represented by other parts of the housing market.
- 3.23 The local planning authority are urged to guard against discrimination in any form and from any source whether internal or external and take appropriate action where necessary.

Reason for Refusal No.3 Housing Mix

- 3.24 The third reason for refusal related to housing mix and a claimed non-conformity with strategic policy SP3 and policy DM21. It is the applicant's opinion, expressed through the previous planning application and subsequent pre-application discussions, that the mix of dwellings previously submitted complied with those policies, insofar as they are relevant.
- 3.25 In particular Table 3.6 (which supports policy SP3) because it states that the proportions of house sizes in the Core Strategy should be taken as "a general rule" and was "to be updated on a regular basis to reflect latest published guidance" (the applicants have not been made aware of any updates to Table 3.6 since 2012).
- 3.26 Notwithstanding, the applicant has followed the planning officer's pre-app advice by providing more 3-bedroom properties, fewer 4+-bedroom properties and has made other changes to the proposed housing mix bringing it closer to the 'general rule' of Table 3.6 of the Core Strategy.
- 3.27 Previous (refused) mix (SCDC Table 3.6 figures shown in brackets):

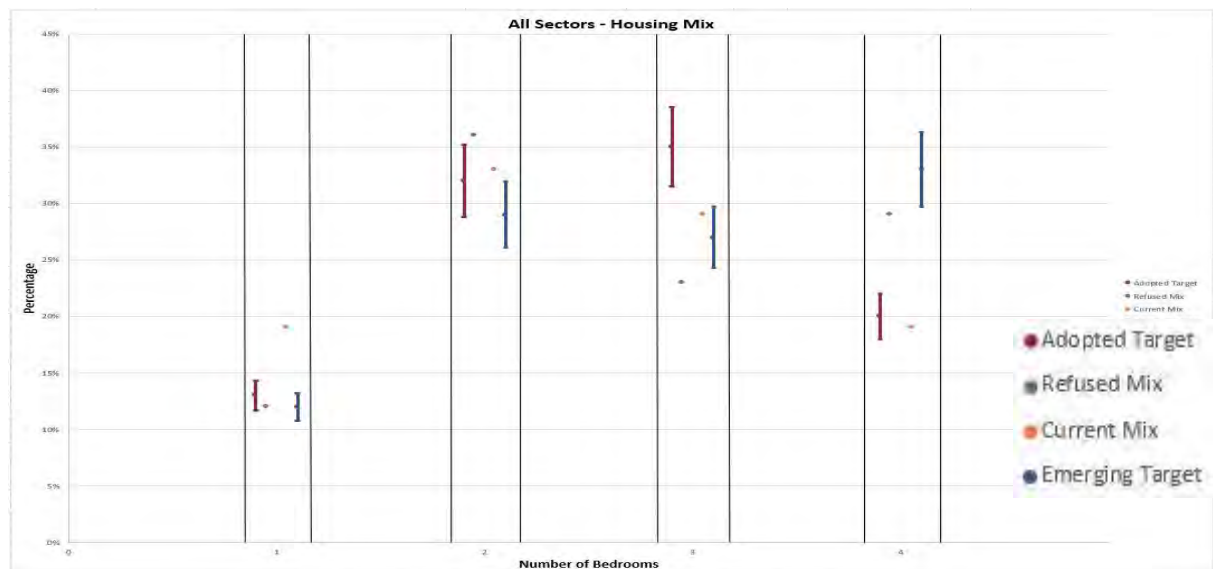
Bedrooms	1	2	3	4+
Open Market Housing	0% (6%)	59% (32%)	100% (39%)	100% (22%)
Affordable housing	100% (43%)	41% (31%)	0% (16%)	0% (11%)
All sectors	12% (13%)	36% (32%)	23% (35%)	29% (20%)

3.28 Current mix (SCDC Table 3.6 figures shown in brackets):

Bedrooms	1	2	3	4+
Open Market Housing	7% (6%)	27% (32%)	40% (39%)	25% (22%)
Affordable Housing	50% (43%)	50% (31%)	0% (16%)	0% (11%)
All Sectors	19% (13%)	33% (32%)	29% (35%)	19% (20%)

(Figures are rounded so may not add up to 100%)

3.29 The following graph represents the various dwelling mix figures compared to one another:



3.30 It can be seen that in response to the further pre-application advice received:

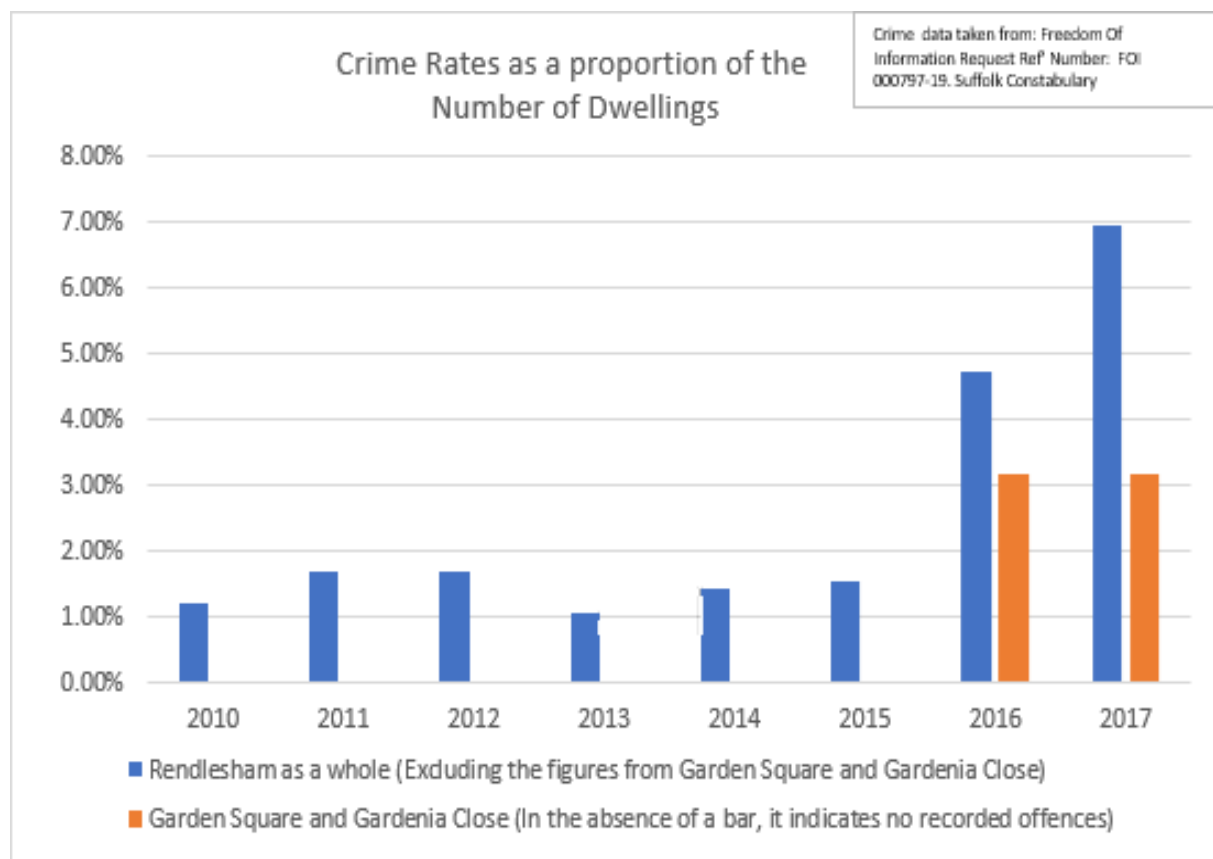
- the percentage of 2 bed dwellings has dropped to within a single percentage point of the adopted target figure and is well within an acceptable range of it,
- the percentage of 3 bed dwellings has increased and is nearer to the adopted target and is within an acceptable range of the emerging targets and
- the number of 4+ bed dwellings has dropped significantly (from a position comparable to the emerging targets) to be comfortably within an acceptable range of the adopted target figure.

Reason for Refusal No.4 Affordable Housing

- 3.31 The fourth reason for refusal centred on affordable housing and stated (incorrectly) that 24% affordable housing was being offered and that none would be made available for specific local affordable housing needs. The first incorrect point was clarified by the applicants by email (31st July) one week after the public consultation period had ended (24th July) as an affordable housing offer of 27%. So it is unclear how or why this then featured in the officer's report unless that had been written at an early stage.
- 3.32 More importantly, the entirely shared equity tenure of the affordable housing previously offered and supported by a viability assessment was rejected by the LPA supported only by 'concerns' expressed by the Housing dept. Notably that in August 2018 the Housing Development Manager called for the Council to undertake its own viability report to counter the viability report the applicants presented, and this was never done.
- 3.33 During the pre-application meeting the applicants pointed out to the local planning authority (through the planning officer) that the LPA was both requiring 50 dwellings and 33% affordable housing and that would generate up to 17 affordable dwellings and that by proposing 75 dwellings with 27% affordable housing the overall number of affordable units was higher than 17 at 20 units. The local planning authority (through the planning officer) acknowledged not having thought of it that way and agreed to seek further advice from the Housing dept.
- 3.34 Further advice was provided by the LPA during the pre-app process and stated "If you are proposing a scheme with less affordable dwellings than that required by planning policy, a viability report would need to be submitted to demonstrate, why the policy requirements cannot be fulfilled, and the level of affordable housing that can be located on the site".
- 3.35 Notwithstanding this, the applicants have moved towards the council's request by offering the full 33% provision of affordable housing (25 units) and by offering a mix of 48% affordable rented (12 units) and 52% discounted market sales (13 units).
- 3.36 It is essential for the local planning authority to note the conclusions of the viability assessment and that whilst 33% affordable housing is proposed this is solely at the developer's discretion, having denied themselves perfectly legitimate profit margins in order to satisfy planning requirements. The viability report makes clear that an offer of 0% affordable housing could have been sought and was defensible.

Reasons for Refusal No.5 Safe Built Environment and No.6 Design

- 3.37 The fifth reason for refusal stated that the design was not well designed because it was not safe. The previous planning officer's report relied heavily on the consultation response from Suffolk Constabulary to support this. The sixth reason for refusal focussed on overlooking, overshadowing and dominating effects.
- 3.38 No party has provided any evidence to support the contention that the housing layout is inherently unsafe. In fact, evidence exists that the housing layout is safe because there is no increased crime data for the existing housing at Garden Close and Gardenia Square which is laid out to the same format.
- 3.39 In March 2019 the applicants made a Freedom of Information request to Suffolk Constabulary and have learnt that during 2010 to 2018 there were 262 recorded offences in Rendlesham, and only 4 of these occurred on Garden Square and Gardenia Close (Appendix 2). For ease of reference the data has been represented below. As can be seen crime in Garden Square and Gardenia Close is proportionately lower than the rest of Rendlesham:



	Year	2010	2011	2012	2013	2014	2015	2016	2017
Rendlesham as a whole (Excluding the figures from Garden Square and Gardenia Close)	Total Number of Crimes	15	21	21	13	18	19	59	87
	Number of Dwellings ¹	1250	1250	1250	1250	1250	1250	1250	1250
	%	1.20%	1.68%	1.68%	1.04%	1.44%	1.52%	4.72%	6.96%
Garden Square and Gardenia Close (In the absence of a bar, it indicates no recorded offences)	Total Number of Crimes	0	0	0	0	0	0	2	2
	Number of Dwellings	63	63	63	63	63	63	63	63
	%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.17%	3.17%
Total Number of Crimes		15	21	21	13	18	19	61	89

¹ The number of dwellings in Rendlesham is based on paragraph 4.01 of the Neighbourhood Plan 2015.

3.40 There would, therefore, appear to be no evidence of a link between the layout of the existing development at Garden Square and Gardenia Close and crime. There is therefore no justification to maintain this line of objection. The data provided should give those purporting fear of crime as a reason to object to the proposed housing layout the comfort that their fear is unfounded.

3.41 Notwithstanding this and other general comments on design, the applicants have worked hard to satisfy the comments made in the previous planning officer's report (in bold in the following paragraphs) and made the following responses during the pre-application process (further commentary is provided in the design and access section of this planning statement):

3.42 **Continuity of design from Tidy Road and Mayhew Road:** The overall intention is for the new development to be an extension of the existing development on Garden Square and Gardenia Close, i.e. to create one integrated development of 138 units in design terms rather than two differentiated developments of 75 units and 63 units.

3.43 The applicants have used the existing and previously approved house designs, and the applicants have extended the grid layout on Garden Square and Gardenia Close. Grid layouts are not uncommon in Rendlesham as can be seen from the Redwald Estate. The layout of Tidy Road and Mayhew Road is rather random and chaotic. The RNP is complimentary about the design and layout of GS and GC but is critical of that of Mayhew Road and Tidy Road.

3.44 **Small amenity space to rear:** It is true that the traditional English approach is to have a small public garden to the front and a larger private garden to the rear. This is typical of suburban developments where houses tend to be much closer together, often in a row of semi-detached or a terrace. This is less of an issue in this development but also in other

parts of Rendlesham where the former American housing is; such as Suffolk Drive.

- 3.45 **Front of plots dominated by car parking and hard standing:** In the site layout for the earlier planning application the applicants allowed for 186 parking spaces to meet SCC guidance. The applicants thought this was excessive, but it was to meet guidance. On 15 January the applicants met with Ben Chester at CHA and they now understand that they can manage with 165 spaces.
- 3.46 The submitted parking plan substantially reduces the amount of car parking and hard standing. The applicants have also softened the impact of hard standing by planting shrubs and hedges in between groups of spaces, and by using cellular paving with grass or gravel for the parking spaces.
- 3.47 **No variation in heights, all two and three storey buildings:** In the revised drawings there is more of a variation. The applicants have introduced a bungalow at 4.8m. The actual heights vary from 4.8m to 11.1m.
- 3.48 **High fences or brick walls to rear of properties:** The report raises a concern that on the west side of the vertical north-south roads there will be a long line of fences and brick walls. This was not a problem on Garden Square or Gardenia Close so the applicants thought SCDC would accept the precedent.
- 3.49 The applicants have softened this by staggering the boundaries, by having different heights for fences or walls, and especially by planting and landscaping. Please find enclosed in Appendix 5 a street scene which illustrates how this can be done.
- 3.50 **Outdoor space associated with Peace Palace:** In the revised layout plan this area has been removed.
- 3.51 **Play area too far away from the properties, less accessible on foot or bicycle, too close to the STW:** In the revised layout plan the applicants have brought this play area closer to the dwellings and away from the STW.
- 3.52 **Visitor parking too far away from the dwellings:** In the earlier plan the applicants had 34 parking spaces in the north-east, of which 18 were for the properties, 12 for visitors, and 4 for PTW (powered two-wheelers). In the revised plan the applicants have reduced this to 12 spaces for visitors and 4 for PTW.
- 3.53 **Green space in cordon sanitaire left unmanaged and used as scrubland:** The green space

and gardens on Garden Square and Gardenia Close are well maintained by an estate management company. Residents pay an estate rent charge to this company. The applicants propose to use the same structure for the new development and are confident it will not be left unmanaged or used as scrubland. Residents will have a strong interest in maintaining it well.

- 3.54 **Too many vertical north-south access roads:** In the revised layout plan the applicants have fewer but also shorter roadways as was in the earlier layout.
- 3.55 **Suffolk Constabulary concerns regarding safety, e.g. surveillance to deter crime, and permeability of the development:** Overall it must be said that the grid layout provides good lines of sight. Garden Square and Gardenia Close are part of a Neighbourhood Watch Scheme and the co-ordinator has confirmed that the actual experience over a number of years is that there has been virtually nil incidence of crime (see Appendix 2). The Suffolk Constabulary concerns are perhaps hypothetical and are not supported by the actual evidence.
- 3.56 Also, some of the changes in the revised layout plan have reduced the 'permeability' of the site, for example the applicants have omitted the trim trail around the back or sides of properties. There will be a perimeter fence along the western and northern boundaries. The applicants have removed the pond area.
- 3.57 **Overlooking, overshadowing, dominating effect - Overlooking Plot 20.** In the revised layout the applicants have removed the tall building with a balcony on Plot 20.
- 3.58 **Overlooking generally:** Please find a plan with the separation distances for the new development and for the existing development on Garden Square and Gardenia Close in Appendix 5. The distances are better in this proposal when compared to Garden Square and Gardenia Close, and also better compared to Tidy Road and Mayhew Road.
- 3.59 **Overlooking Plot 15:** The applicants have three maisonette blocks around the peace palace, and to maintain the design symmetry would require building a fourth maisonette block on the northwest corner of the building. The separation distance is the same between Plot 15 and 5-6 Peace Palace Gardens as it is between 1-2 PPG and 3-4 PPG. There are trees between Plot 15 and 5-6 PPG which will provide privacy.
- 3.60 **Overlooking between flank elevations (north-south):** Generally, the house designs tend to have very few windows on the north elevations. Also, the separation distances between

flank elevations on the new development are better compared to the existing and previously acceptable GS and GC and to Tidy Road and Mayhew Road, see plan attached.

3.61 **Overshadowing between flank elevations:** The applicants have staggered some of the buildings to respond to this point.

3.62 **Trim trail - noise and overlooking:** In the layout plan the applicants have removed the trim trail and maintained the eastern stretch which could become the bridleway.

3.63 Further pre-application advice was provided at the end of the pre-application process and gratefully received by the applicants. The advice is set out below (paragraphs beginning 'Q') with the applicants' current responses included (paragraphs beginning 'A'):

3.64 Q: *Access through the site: The amount of roads have been reduced from the previous application, to the east of the site but there are still a large amount of roads to the west of the site. Why can roads 1, 2, 3, 4, 5 and 6 not be removed from the site? This will then half the amount of hard standing that is being developed.*

3.65 A: Compared to the site layout of June 2018 the applicants have already removed large sections of road. The applicants propose to use clay pavers as the surface material for the shared driveways so as to soften the impact of hard standing. Here the planning officer is suggesting that the applicants go further and remove more sections of roads by having one north-south road serve two rows of houses on the east and on the west. The applicants prefer to have the main entrances to the individual properties on the east or on the north, and consequently one road serves one row of houses with the main entrance on the east or north. If one road was to serve two rows of houses, firstly the houses on the west of the road would be accessed from the rear/west of the properties and this would require a footpath to the entrance at the front/east or at the side/north. Secondly it would double the amount of car parking in that road. Thirdly it would shorten separation distances east-west and might add to overlooking, since some rows of houses would be brought closer together by the omission of some of the roads. By having one road serve one row of houses, access to the main entrance is much easier, the car parking is dispersed and diluted, and the separation distances are more generous.

3.66 Q: *Can there not be connections made at the areas circled on the map attached? This will then improve the accessibility around the site.*

3.67 A: There are vehicular and pedestrian access points from Garden Square on the east of the

site and Tidy Road on the west, and a further pedestrian access point in the middle of the site between Plot 15 and 5-6 Peace Palace Gardens (existing). This provides 5 points of access in total.

3.68 Q: *The main road through the site is better, this makes a feature of it.*

3.69 A: The central east-west road gives ease of access to the buildings on either side, and with judicious landscaping and planting can become a beautiful approach road to the development.

3.70 Q: *Community space: What is this going to be used for? who is going to own this? It says educational, is this going to be a school for the rest of Rendlesham to use? Depending on the proposed use are two houses this close going to be impacted upon?*

3.71 A: The applicants propose to reserve the area to the west of the site between Plots 18 and 19 for some future educational or community use, similar to the peace palace on Gardenia Close. Plots 18 and 19 will frame the proposed future building, and there is sufficient space to allow this without being impacted upon. This will be a separate stand-alone planning application in the next few years. In the meantime, the land will be used as formal open space.

3.72 Q: In the new local plan that is going through the consultation process (depending when a new application is going to be submitted) there is a requirement for a public house or other development of that nature.

3.73 A: This would be better placed in the village centre, close to the existing shops and community centre, rather than on the periphery of Rendlesham.

3.74 Q: *Because this would be a development at the end of the main road through the site and highly visible it would be appropriate for it to be developed at an early stage so it is not left as blank land or depending onto the potential development of the site this would be more appropriate as a garden. But detail would need to be provided at an early stage, to ensure that this can be conditioned or developed in a phase of the overall site.*

3.75 A: In the interim the applicants propose to use this land as formal open space and to landscape it as formal gardens, not to leave it as blank land.

3.76 Q: Site Layout: Thank you for the separation distances, but this does not make it clear if there would still be direct looking between windows the houses appear to be staggered

slightly but this could appear messy once developed if they are not lined up. Further detail would be required on the design of the dwellings and their relationship between each other.

3.77 A: The proposed separation distances front to back (east-west) and between flank elevations (north-south) are better than those on the existing development on Garden Square and Gardenia Close. The applicants have lined up the houses and reduced the staggering. The applicants have sought to reduce overlooking in other ways as well – by planting and landscaping between rows of houses, by reducing the number of windows on north elevations, and by placing some second-floor windows on north and south elevations at a cill height of 1.7m.

3.78 Q: *Bungalows have been provided, where?*

3.79 The applicants have provided two bungalows on Plots 8 and 17.

3.80 Q: *Are these still three and two storey height dwellings? Any semi-detached properties Terraced properties? to mix up the site*

3.81 A: There is a mix of heights from 5.1 m to 10.8 m, a mix of one-storey and three-storey dwellings, and a mix of property types: 18 detached properties, 8 semi-detached properties, 12 maisonettes, and 37 apartments.

3.82 Q: *Why is the visitor parking still located near the park area? Can the parking for the properties be relocated to the side of the dwellings so they do not dominate the front of the properties?*

3.83 A: There are 15 visitor car parking spaces. 11 of these are interspersed amongst the dwellings. Only 4 are near to the parkland area.

3.84 Q: *Hedges and fences to the rear of the properties, it has been stated that these will be staggered and different heights. But there would still be a whole street of just hedges and fences. This would occur 13 times through the development. Once or twice, where there is an awkward site within the application site, but this is square and spacious enough not for there to be a problem where this needs to occur. This would be rectified by having back to back dwellings and them not facing the same direction. This would also open up some space for the gardens and the sites would not be restricted for the size of the dwellings.*

3.85 A: This raises similar issues as question 1.2 above, i.e. one road serving two rows of

houses. If there were back to back dwellings not facing the same direction, this would create a concentration of car parking and shorter separation distances. On Garden Square and Gardenia Close there are examples of hedges and fences along the rear/west of properties, and this is not a problem. With planting and landscaping, the street scenes can be very attractive. To illustrate this the applicants have prepared an artist's impression of a proposed street scene. This is shown in Appendix 5. As stated in the local plan review orientation is an integral requirement of sustainable construction. Capital Community Developments specialises in creating healthy living environments, this includes sustainable construction as detailed in the design and access section of this statement.

Reason for Refusal No.7 Habitats Regulations Assessment and Mitigation

- 3.86 The seventh reason for refusal states that mitigation to confirm the HRA report conclusion has not been provided or secured.
- 3.87 During pre-application discussions the applicant's Ecological Consultant (who has separately worked for the District Council supporting their local plan) pointed out that up to that point RAMS (the Recreation Avoidance Mitigation Scheme) had not been formally adopted to his knowledge and therefore the applicants could not comply with something that did not yet exist. The local planning authority (through the planning officer) could not confirm that RAMS was in place, only that planning officers were required by the Head of Planning to secure it in planning decisions. The conclusion of the pre-application discussions was that RAMS was still not formally adopted but by the time of this resubmission and any subsequent approval it probably would be and therefore this planning application is accompanied by the Council's RAMS proforma. Evidently, if RAMS is still not formally adopted by the Council the local planning authority will have to be cautious about requiring compliance with it

Reason for Refusal No.8 Planning Obligations

- 3.88 The eight reason for refusal is a standard addition to a decision notice where a section 106 has not yet been provided. In this case draft heads of terms have been provided covering the planning obligations likely to be required from this planning application including; affordable housing, public open space, RAMS, CIL etc.

Summary of the Pre-application Advice and Responses

3.89 The applicants are content that the following matters remain common ground between the parties as a result of the further pre-application discussions:

- The local planning authority's housing numbers and distribution policy is out of date engaging the 'tilted balance'.
- The proposal to erect 75 dwellings on a site allocated for at least 'approximately 50' is permissible in principle and subject to detail.
- The affordable housing offer can be below the target level subject to viability assessment.
- The recommended housing mix in the Core Strategy is a target only.

3.90 The applicants are grateful of the further design advice provided by the local planning authority through the pre-application process and are content that a great deal of progress has been made with the assistance of the planning officer on matters of design and layout.

4.0 Review of Complementary Topics

4.1 The following table summarises topics covered by reports and surveys which accompany this planning application; it sets out the response of the relevant statutory consultee in the previous planning application, whether any changes have been made to the documents submitted now and, if so, what the outcome is expected to be.

Topic	Previous Statutory Consultee Response	Any change made to report? What is the new conclusion?
Air quality	No consultee specifically referenced this report.	The report has been resubmitted and no issues are expected to arise again.
Arboriculture	The surrounding trees have been surveyed and it is not anticipated that the development will have any adverse impact on them.	This report has been updated to reflect the amended layout design and should receive the same positive response as before.
Landscape	The site is visually well contained, this landscape impact is restricted to the site itself and will not extend to the wider landscape.	The layout plan has been amended following further pre-application advice and should receive the same positive response as before.
Archaeology	Suffolk County Council recommended standard conditions.	The earlier Geophysical Survey Report has been resubmitted. In March 2018 SCC Archaeological Service requested a trenched archaeological excavation. Suffolk Archaeology carried this out in August 2018 and the applicants have submitted their report.
Contamination	Environmental health recommended standard planning conditions be attached to an approval.	The report has been resubmitted and no issues are expected to arise again.
Ecology Survey	No responses were received from wildlife organisations.	The report has been resubmitted and no issues are expected to arise again.
Habitats Regulations Assessment		This report has been updated to reflect the pre-application discussions.
Odour	No consultee specifically referenced this report.	The report has been resubmitted and no issues are expected to arise again.
Highways and Transport	Suffolk County Council Highways recommended planning conditions and obligations to attach to an approval.	This report has been updated to reflect the pre-application discussions and should receive the same positive response as before.
Flood risk and drainage	Environment Agency not clear why they were consulted. SCC Flood team replied to say "We have reviewed the following submitted documents and we recommend approval of this application subject to conditions". Anglia Water recommended a planning condition.	This report has been updated to reflect the amended layout design and should receive the same positive response as before.
Planning obligations	NHS made recommendations for planning obligations as did Suffolk County Council Development Contributions Manager.	The information submitted has been amended following further pre-application advice and the applicants look forward to discussing the details with the LPA.

5.0 Design and Access Principles

- 5.1 National Planning Practice Guidance provides guidance on the design and access information a planning application should include. It states:

“What should be included in a Design and Access Statement accompanying an application for planning permission? A Design and Access Statement must:

- (a) Explain the design principles and concepts that have been applied to the proposed development; and*
- (b) Demonstrate the steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account.*

A development’s context refers to the particular characteristics of the application site and its wider setting. These will be specific to the circumstances of an individual application and a Design and Access Statement should be tailored accordingly.

Design and Access Statements must also explain the applicant’s approach to access and how relevant local plan policies have been taken into account. They must detail any consultation undertaken in relation to access issues, and how the outcome of this consultation has informed the proposed development. Applicants must also explain how any specific issues which might affect access to the proposed development have been addressed.”

- 5.2 In addition, National Planning Practice Guidance also states:

“A Design and Access Statement is a concise report accompanying certain applications for planning permission and applications for listed building consent. They provide a framework for applicants to explain how the proposed development is a suitable response to the site and its setting and demonstrate that it can be adequately accessed by prospective users. Design and Access Statements can aid decision-making by enabling local planning authorities and third parties to better understand the analysis that has underpinned the design of a development proposal. The level of detail in a Design and Access Statement should be proportionate to the complexity of the application but should not be long.”

- 5.3 The project architects have provided the requisite information arranged under the NPPG topics and set out below:

The design principles and concepts that have been applied to the proposed development

- 5.4 The proposed development is intended to be an extension of the existing development on Garden Square and Gardenia Close which lies to the south. It is not intended to be a stand-alone, separate development.
- 5.5 The existing development on Garden Square and Gardenia Close is based on a grid layout. The proposed development continues this theme and is also based on a grid layout.
- 5.6 To the east of the proposed development the former USAF housing on the Redwald Estate is also based on a grid layout, as can be seen in the foreground of this aerial photograph.



- 5.7 There is a central east-west road from the end of Garden Square which runs through the middle of the site, with shared driveways running north-south off the central road, and housing in formal groupings on these shared driveways.



- 5.8 The north-east of the site is informal open space and orchards. It has not been developed due to the exclusion zone around the Water Recycling Centre which lies to the north of the site boundary. There are two feature spaces with formal gardens, one to the south of the site, and one to the west. In addition there are extensive areas of planting and soft landscaping on the sides of roads, on the shared driveways, and amongst the buildings.
- 5.9 The applicant has sought to soften the impact of parking spaces and hard standing by introducing planting and by using different surface materials such as clay pavers, cellular paving with grass, and cellular paving with gravel.



- 5.10 There is a very varied mix of housing – 18 detached houses (3-5 bedrooms), 8 semi-detached houses (3-4 bedrooms), 12 maisonettes (2-3 bedrooms), and 37 apartments (1-3 bedrooms). In terms of density, there are 23 units per hectare, based on a nett developable area of 3.2 hectares.
- 5.11 Since the proposed development is intended to be an extension of the existing development on Garden Square and Gardenia Close, the proposed development continues the styles and materials already used on Garden Square and Gardenia Close.
- 5.12 The development on Garden Square and Gardenia Close draws on principle of architecture which promotes the health and well-being of the occupants of the buildings. The key principles are right direction, right placement of rooms, right proportion, and the use of natural and non-toxic materials. However, the styling of the buildings is Suffolk vernacular, i.e. rural Georgian and Suffolk farmhouse or cottage. There is also one contemporary design (Bramfield).
- 5.13 There are 37 buildings in 9 designs: five for detached houses (Easton, Woodbridge, Framlingham, Parham, Bramfield), one for semi-detached houses (Great Glemham, Little Glemham), one for maisonettes (Great Bealings, Little Bealings), and two for apartments (Wilby, Sudbury).
- 5.14 Five of the designs are taken from the existing designs on Garden Square and Gardenia Close (Easton, Woodbridge, Framlingham, Glenham, Bealings). This gives visual continuity between the two developments. The Sudbury is an adaptation of an existing design of the same name. The other three designs are new (Parham, Bramfield, Wilby).



5.15 The main materials used will be brick, clay blocks, clay pantiles, and timber.

5.16 The overall design of the site and that of individual dwellings has been carried out with a holistic approach to enhance the health and well-being of people as occupants of individual dwellings and as residents of the development as a whole. This has included practical solutions to address conventional design issues including the following twelve points.

5.17 To maximise the many recognised benefits of natural light for the mental and physical health of the occupants, the design includes certain measures to bring more sunlight into the home:

- Orientation of buildings NSEW so more near-horizontal sunlight can penetrate through the house in the morning and evening throughout the year.
- Proportions of buildings so that East-West elevations to front and rear are longer than North-South elevations to the sides. This gives the opportunity for a higher proportion of glazing on East and West sides than on North and South.
- Large spaces between buildings on the streets to the East and West of each unit (average 7m measured North-South see Site Plan). This allows for more sunlight to shine through the gaps than would be the case on many new estates where buildings are closer to each other.
- Increased floor to ceiling heights * (2580 – 2700mm) facilitate higher lintels, so that glazing in the upper part of windows can bring more unobstructed light into the rooms. Portrait windows are preferred in deeper designs such as the apartments to catch more direct sunlight in the upper part without the windows becoming unduly wide.
- Windows to internal walls are an unusual feature of the houses and apartments. Together with glazed internal doors these allow for the further penetration of East-West light in the morning and evening into rooms on the opposite side of the house to the sun.
- Raised ground floors - 480mm above surrounding ground level rather than the building control minimum 150mm. Whilst predominantly a measure to reduce flood risk, this feature of the design also helps to reduce obstruction of light to the ground floor from any garages, sheds or planting close to the building.

5.18 The value of high ceilings in making small rooms more liveable is increasingly recognised in

many innovative new developments such as those by Urban Splash in Manchester, and by Nationwide in Swindon - where ground floor ceiling heights are nearly 300mm higher than the industry standard of 2300-2400mm.

5.19 The following measures have been taken to minimise heat loss to the dwellings:

- Thick-wall construction through a fabric-first approach to the design. The 420mm insulated external walls provide a high standard of thermal insulation.
- Large gap between any dwelling and the adjacent building to the South (average 7m for the site ref Site Plan Pd) increases solar gain on any South wall.
- Minimal glazing on all North elevations also contributes to reduction of heat loss to the dwellings.
- Heat-recovery units are to be included to the extractor fans to kitchen and bathrooms.

5.20 To maximise natural cooling:

- Thick-wall construction through a fabric-first approach to the design. The 420mm insulated external walls are in masonry which increases their thermal mass thereby contributing to internal comfort in each dwelling. The heat is held more in the fabric which reduces reliance on the required ventilation system.
- Cross-ventilation through predominance of windows on East-West elevations and doors and windows to internal walls in between. The ability to open these facilitates cooling in the summer.

5.21 Many of these measures were included to good effect at the adjacent development at Garden Square / Gardenia Close. Their performance has been monitored over the last 5-12 years with feedback from customers and the results then used to improve the design of the proposed scheme.

The steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account

5.22 The proposed development lies on the northern periphery of the village of Rendlesham.

5.23 Rendlesham has grown out of the redevelopment of the former US Airforce domestic base at Bentwaters. The technical base is on the east of the A1152 and has been redeveloped as a business park and is a growing employment area. The village centre is well serviced. This

is a sustainable location to live and work. The site has been identified for residential development since 1996.

- 5.24 The site itself is relatively level. It has been a cultivated field for many decades. There is mature woodland to the west and north of the site boundary, and open farmland beyond that. There is a line of hedges and trees along the eastern site boundary, with the Redwald Estate further to the east. To the south there is the existing development on Garden Square and Gardenia Close.



- 5.25 The applicant has taken into consideration the context of the proposed development and has sought to create an extension to the existing development on Garden Square and Gardenia Close, by continuing the grid layout for the site, and by continuing some of the existing property designs.



The applicant's approach to access and how specific issues which might affect access to the proposed development have been addressed

- 5.26 There are two vehicular points of access to the proposed development, one from Garden Square to the east and the other from Tidy Road to the west. There are three pedestrian points of access from Garden Square and Tidy Road, and from Peace Palace Gardens (off Gardenia Close) to the south.
- 5.27 There is a loop road that connects the two vehicular access points at Garden Square and Tidy Road.
- 5.28 There is very good access to the district centre to the south at the heart of the village. The site is within a 6 minute walk or 2 minute cycle ride of the village centre.
- 5.29 Within the proposed development there is a minor access road connecting the two access points from Garden Square and Tidy Road, three shared surface roads, and various shared driveways. There are several footways and footpaths.
- 5.30 Overall there is good access within the proposed development, and from the proposed development to the rest of Rendlesham.

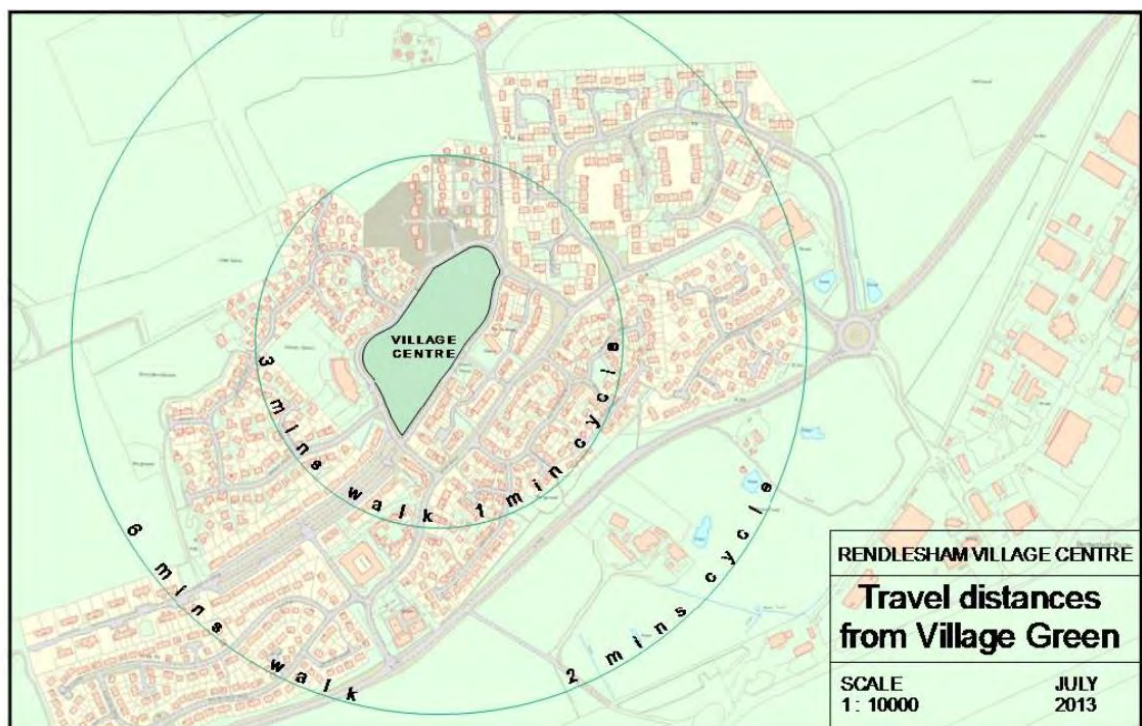


Figure 29 from the Rendlesham Neighbourhood Plan.

6.0 Planning Policy and Analysis

- 6.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in the context of the Development Plan and its policies unless material considerations indicate otherwise.
- 6.2 This part of the planning statement confirms the status of the Development Plan, the planning policies relevant to the determination of this planning application, the existence of material considerations to weigh in the planning balance and an explanation of why the proposed development should be granted planning permission irrespective of how it is approached in policy terms.

Status of the Development Plan

- 6.3 The Development Plan currently consists of the following planning documents:
- Core Strategy and Development Management Policies adopted in 2013
 - Site Allocations and Area Specific Policies adopted in 2017
 - Rendlesham Neighbourhood Plan Made in 2015
 - Saved Policies of the 2001 Local Plan
- 6.4 The local planning authority have accepted through pre-application advice that policy SP2 of the Core Strategy is out of date. This remains the case since the previous planning application.
- 6.5 Policy SP2 is out of date because of the late commencement of the Local Plan review which has resulted in the Core Strategy being out of date.
- 6.6 As a Core Planning Principle, the NPPF requires local planning authorities to keep their local plans up to date.
- 6.7 The result of the local planning authority's principle planning policy on housing supply and distribution (Core Strategy policy SP2) being out of date is that it, and the policies that derive from it or are 'most important' in the decision-making process should be given less weight; i.e. should not be used to limit development on sustainable sites.

6.8 This situation also means that Paragraph 11 of the National Planning Policy Framework and the ‘tilted balance’ is engaged. The local planning authority will need to clearly demonstrate the balancing exercise in their decision making this time.

6.9 Other material planning considerations, which are discussed below, include:

- The emerging local plan review and the following policies:
 - SCLP3.1 Growth Strategy
 - SCLP3.2 Settlement Hierarchy
 - SCLP3.3 Settlement Boundaries
 - SCLP3.5 Infrastructure Provision
 - SCLP5.1 Housing Development in Large Villages
 - SCLP5.8 Housing Mix
 - SCLP5.10 Affordable Housing on Residential Developments
 - SCLP8.2 Open Space
 - SCLP9.2 Sustainable Construction
 - SCLP Sustainable Drainage Systems
 - SCLP10.1 Biodiversity
 - SCLP10.4 Landscape Character
 - SCLP11.1 Design Quality
 - SCLP11.2 Residential Amenity
 - SCLP12.62 Land West of Garden Square Rendlesham
- The National Planning Policy Framework 2019 which post-dates the Council’s 2008 Core Strategy. Relevant supporting paragraphs include:
 - Paragraph 8 and the three dimensions of sustainable development.
 - Paragraph 11 and the Presumption in Favour of Sustainable Development.
 - Paragraph 47 of the NPPF sets out in clear terms the role of the planning system to “boost significantly the supply of housing”. This imperative is

emphasised when key housing policies are out of date.

- Paragraph 59 and the imperative to ‘boost significantly the supply of housing’.

6.10 The local planning authority have acknowledged that the Paragraph 11 ‘tilted balance’ is engaged because their main housing supply and distribution policy is out of date and this requires:

“where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.*

Comprehensive Policy Analysis Methodology

6.11 This planning policy analysis takes a comprehensive approach by assessing the development against planning policies and guidance in both principle ways:

Decision Making Approach 1: Determination in Accordance with the Development Plan

- Assessment of Development Plan policy compliance and whether any identified policy conflicts are countered by material considerations.

Decision Making Approach 2: Determination in Accordance with the Presumption in Favour of Sustainable Development

- Whether the proposal is compliant with the Development Plan in the first instance.
- Whether any Footnote 6 considerations exist and provide a clear reason for refusing the proposed development.
- Balancing exercise of development benefits and any adverse impacts.
- The effect of any other material considerations to the planning balance.

6.12 The first approach simply assumes the adopted Development Plan is intact (i.e. not out of date) and assesses the proposal against Development Plan policies applying material considerations in the usual way; that planning applications which accord with an up to date

Development Plan should be approved without delay.

- 6.13 The other approach takes the local planning authority's own acknowledgement that the Development Plan is out of date, and that the 'tilted balance' is engaged, and assesses the development in the approximate way following Paragraph 11 of the NPPF.

Decision Making Approach 1: Determination in Accordance with the Development Plan

- 6.14 In this section Parker Planning Services has reviewed the Development Plan in order to assess the development's performance against its policies.

- 6.15 Policy SP1 sets out how the local planning authority will pursue its strategy of sustainable development including some relevant to this planning application:

- *To relate new housing development to the settlement hierarchy*
- *Achieve a balance between employment opportunities, housing growth and environmental capacity*
- *Ensure the provision of the appropriate infrastructure in order to support existing and proposed communities*
- *Promote sustainable construction*
- *Maintain and enhance a sense of place*

- 6.16 This planning application supports these criteria for the following reasons:

- The site is located in Rendlesham which is a key service centre and thus a sustainable settlement in the local planning authority's settlement hierarchy.
- Because the site is located in Rendlesham the scheme will be located near to employment opportunities (in the village and the large general employment area at Bentwaters Park). Rendlesham is sufficiently distant from areas of high environmental sensitivity such that a balance between housing growth, employment and environment will be achieved.
- Community infrastructure levy funds from this development will provide off-site infrastructure to support the community.
- Sustainable construction methods and materials are at the heart of this scheme which will maintain and enhance a sense of place.

- 6.17 No conflicts with SP1 criteria exist. This proposal is compliant with the requirements of policy SP1.
- 6.18 Strategic Policy SP1a Presumption in Favour of Sustainable Development states that “where [...] policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise taking into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits or specific policies in the Framework indicate that development should be restricted”. The local planning authority have again accepted through the further pre-application advice that the NPPF paragraph 11 ‘presumption in favour of sustainable development’ and ‘tilted balance’ applies and this planning statement demonstrates that the balance of benefits versus impacts is clearly in favour of granting planning permission.
- 6.19 Strategic Policy SP2 Housing Numbers and Distribution is confirmed (as a result of the further pre-application advice) by the local planning authority to be out of date because of the long delay in the commencement of the Core Strategy review and as a result the housing requirement in SP2 is not based on an Objectively Assessed Need in accordance with the Framework.
- 6.20 Policy SP2 sets the overarching housing numbers and distribution across the district upon which all other housing policies in the development plan are predicated. Therefore, housing policies concerned with setting numbers, such as the guide figure of ‘approximately 50’ dwellings set out in policy SSP12, should not be regarded as limiting factors in of themselves but rather re-considered in light of the Presumption in Favour of Sustainable Development. In this case the prerogative to boost housing supply significantly should direct the local planning authority to act positively and support the applicant in their efficient use of an allocated site. As such this proposed development should not be considered to be in conflict with the aims of policy SP2.
- 6.21 Strategic Policy SP3 New Homes states that the Council’s strategy will be to “increase the stock of housing to provide for the full range of size, type and tenure of accommodation” and “such provision is to be made in a manner that addresses both the immediate needs of the resident population and the longer term future needs of the population, in accordance with the principles of sustainable development and sustainable communities”. Approving this proposed development would help increase the district’s housing stock in a sustainable location. The proposed scheme would also contribute to the range of accommodation available in the district in compliance with this policy.
- 6.22 Strategic Policy SP11 Accessibility states that “in relation to foot and cycle provision this will mean securing safe and easy access to local facilities where walking or cycling offers a realistic alternative for most people”. The proposed design provides for pedestrian and cycle links to the village and on

to the district centre in compliance with this policy. This also meets a key aim of the Rendlesham Neighbourhood Plan.

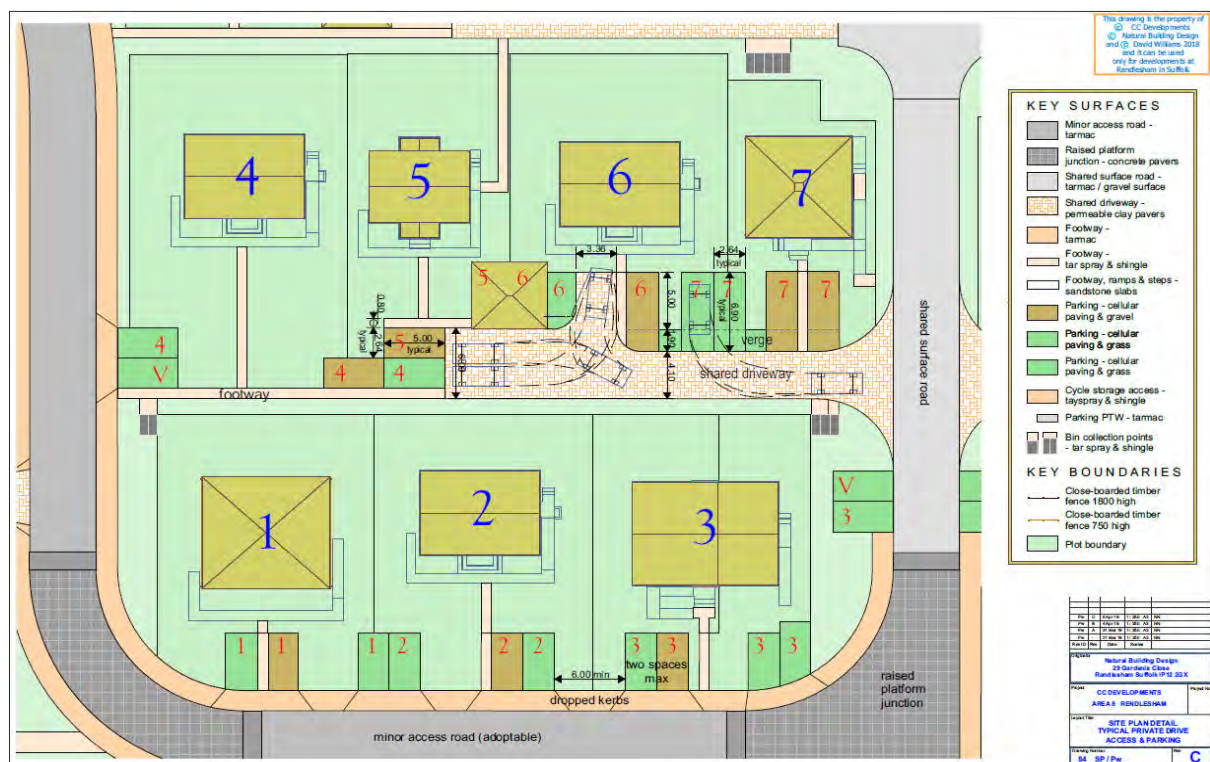
- 6.23 Strategic Policy SP12 Climate Change states that “the district council will contribute towards mitigating climate change by ensuring development minimises the use of natural resources by utilising recycled materials where appropriate, minimises greenhouse gas emissions, incorporates energy efficiency, encourages the use of public transport, helps to reduce waste and minimises the risk of pollution”. Environmental sustainability is at the heart of the applicant’s design rationale where sustainable materials and architectural principles place compliance with this policy at the core of the development.
- 6.24 Strategic Policy SP14 Biodiversity states that biodiversity will be protected. This planning application is accompanied by site specific and habitats-level ecological appraisals which meet the requirements of this policy.
- 6.25 Strategic Policy SP15 Landscape and Townscape states that “the policy of the Council will be to protect and enhance the various landscape character areas within the district”. This proposed development site is well contained by the existing built form of the village and to the north and west by dense established woodland in compliance with his policy:



- 6.26 Strategic Policy SP16 Sport and Play requires that “the appropriate provision, protection and enhancement of formal and informal sport and recreation facilities for all sections of the community will be supported, particularly where shortfalls in local provision can be addressed and it accords with local requirements”. Strategic Policy SP17 Green Space states that “The Council will seek to ensure that communities have well-managed access to green space within settlements [...], in order to benefit health, community cohesion and greater understanding of the environment, without detriment to wildlife and landscape character. Where adequate green space is not provided as part of a development, developer contributions will be sought to fund the creation of appropriate green space and/ or management and improvement of access to green space [...] Developer contributions will be secured by means of conditions, legal agreements and/or through the Community Infrastructure Levy (CIL)”. This application provides substantial areas of exceptionally high quality informal and formal recreational public open space in compliance with these policies.
- 6.27 Strategic Policy SP18 Infrastructure states that “CIL will become the primary means of securing off - site contributions. In respect of specific proposals such as housing allocations, the necessary infrastructure will be identified, and costs estimated in order that its provision can be tied into and phased with the development itself”. The Suffolk Coastal CIL calculator (see Appendix 3 estimates that the CIL money raised from this development will be in the region of £700,000 and because Rendlesham has a ‘Made’ neighbourhood plan 25% of this (£175,000) will be spent on local infrastructure projects in Rendlesham.
- 6.28 Strategic Policy SP19 Settlement Policy classifies Rendlesham as a key service centre because it provides “an extensive range of specified facilities” including “public transport, shops, local employment, meeting place, post office, pub or licensed premises, primary school or doctors’ surgery” and that “within the defined physical limits of key service centres modest estate scale development will be appropriate where consistent with scale and character of the settlement”. This development proposal is a modest scale development of 75 houses on a site historically allocated for 75 dwellings.
- 6.29 Strategic Policy SP27 Key Service Centres states that the Council’s strategy will be to “permit housing development within defined physical limits”. The application site is entirely within the settlement boundary for Rendlesham and is allocated for housing in compliance with this policy.
- 6.30 Development Management Policy DM2 Affordable Housing on Residential Sites states that “the Council commissioned a Local Housing Assessment, completed in July 2006, which identified the affordable housing need of the district as 24% of all new homes. Policies SP1, SP19, DM1 and DM2

provide the framework within which to provide the estimated 1,896 affordable homes required over the period 2010 to 2027". Policy DM2 aims for 33% affordable housing. This planning application proposes 33% affordable housing which far exceeds the evidenced affordable housing need of 24% set out in Paragraph 2.12 of the supporting text to policy DM2 and this needs to be recognised by the local planning authority in its decision making. It is important to note that a proposal for "approximately 50 units" would have generated approximately 17 affordable housing units at a rate of 33%. It is a material consideration in favour of this development proposal that 33% of 75 delivers more affordable housing at 25 units. The viability report is clear that the affordable housing offer has been made with the applicant choosing to deny himself legitimate development profits and this needs to be borne in mind also by decision makers.

6.31 Development Management Policy DM19 Parking Standards requires "proposals for all types of new development will be required to conform to the District Council's adopted parking standards as set out in a Supplementary Planning Document". Parking standards are governed by the Suffolk County Standards and this development proposal has been designed in accordance with them in compliance with this policy.



6.32 Development Management Policy DM20 Travel Plans applies to new development which would have "significant transport implications". The Highways Statement which accompanies this planning application has assessed that "a Travel Plan is not warranted for this site" because it will not cause

significant transport implications.

6.33 Development Management Policy DM21 Design Aesthetics states that “Proposals that comprise poor visual design and layout, or otherwise seriously detract from the character of their surroundings will not be permitted. Development will be expected to establish a strong sense of place, using street scenes and buildings to create attractive and comfortable places to live, work and visit. Accordingly, development will be permitted where the following criteria are met:

- Relate well to the scale and character of their surroundings
- Create a new composition and point of interest
- Provide a positive improvement in the standard of the built environment of the area generally
- Layouts should incorporate and protect existing site features of landscape, ecological, heritage or amenity value as well as enhance such features e.g. habitat creation
- Attention must be given to the form, scale, use, and landscape of the spaces between buildings and the boundary treatment of individual sites particularly on the edge of settlements”

6.34 The policy ‘tests’ for refusing planning applications using policy DM21 are high and require proposals to “comprise poor visual design and layout, or otherwise seriously detract from the character of their surroundings”. This is reinforced by the NPPF which states that “where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development”.

6.35 The proposed design cannot reasonably be said to ‘significantly detract from the character of the surroundings’ when those ‘surroundings’ include an existing development by the same applicants on land adjacent to the site at Garden Square and Gardenia Close. Likewise, the layout cannot be ‘poor’ when it follows the same architectural principles at Garden Square and Gardenia Close previously approved as acceptable by the local planning authority.

6.36 Because of the design’s adherence to previously acceptable design and layout standards the proposals must:

- Relate well to the scale and character of their surroundings
- Create a new composition and point of interest
- Provide a positive improvement in the standard of the built environment of the area generally

6.37 In addition, the proposed layout incorporates and protects existing site features of landscape,

ecological, heritage or amenity value as well as enhance such features e.g. habitat creation. As a direct result of the further pre-application advice provided the applicants have focussed greater attention to the form, scale, use, and landscape of the spaces between buildings and the boundary treatment of individual sites in compliance with this policy.

6.38 Development Management Policy DM22 Design Function requires the following matters to be achieved by new developments:

- To make adequate provision for cars, cycling, garages, parking areas, access ways and footways
- To enable access, turning and manoeuvring for emergency and waste vehicles

6.39 The proposed layout has been designed with input from highways advisor and further pre-application advice and provides the requisite access and parking standards in compliance with this policy.

6.40 Development Management Policy DM23 Residential Amenity states that “the local planning authority will have regard to a number of criteria in assessing the impact of new development on residential amenity”. The further pre-application advice has focussed the applicant’s attention on issues of overlooking and separation between dwellings. The applicants have developed the layout plan specifically to minimise instances of overlooking by moving dwellings types or by inserting narrowed windows on flanking elevations. The applicants have also provided a drawing which compares the separation distances between the proposed dwellings and those previously deemed acceptable by the local planning authority at Garden Square and Gardenia Close showing that the separation distances within this proposal are greater, in compliance with this policy.

6.41 Development Management Policy DM24 Sustainable Construction states that “the Council will expect all new developments [...] to use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care in order to reduce emissions linked to changes to the climate and take into account the effects of climate change”. As described in the design and access section above this development is highly sustainable in terms of its resource use and choice of materials etc. in compliance with this policy.

6.42 Development Management Policy DM26 Lighting states that “the Council will seek to reduce light pollution from development”. This development will not introduce any new sources of light which do not already exist on neighbouring residential land. This policy is complied with.

6.43 Development Management Policy DM27 Biodiversity requires that, amongst other matters; “all development proposals should protect the biodiversity value of land, maximise enhancement and

connection of natural habitats and incorporate beneficial biodiversity conservation features where appropriate". The ecology reports submitted with this planning application confirm that biodiversity will not be adversely affected at both the site level and the wider habitats-level in compliance with this policy.

- 6.44 Development Management Policy DM28 Flood Risk states that "Proposals for new development, or the intensification of existing development, will not be permitted in areas at high risk from flooding, i.e. Flood Zones 2 and 3". This planning application is supported by a flood risk assessment which confirms that the site is outside of flood zones 2 and 3 and the development will not increase the risk of flooding elsewhere, in compliance with this policy.
- 6.45 Development Management Policy DM32 Sport and Play states that "Proposals for new residential development will be expected to provide or contribute towards indoor and outdoor sport and play space, including equipment and maintenance, where a local need has been identified. Contributions to off-site provision will be secured as part of the standard charges set in the Community Infrastructure Levy Charging Schedule, when adopted". The CIL revenues derived from this development will contribute to local infrastructure needs in compliance with this policy.
- 6.46 Development Management Policy DM33 Allotments states that "the district council will encourage the provision of new allotments in order to meet demand that might be identified". The policy test here is for the local planning authority to 'encourage' the provision of allotments. The neighbourhood plan policy RNPP3 which overrides policy DM33 by providing locally specific policy guidance provides alternatives to allotment provision including growing spaces and community orchards. Objective 4 supporting RNPP3 states "that off-site provision allotment will be sought where land is not available on site". In this case land is available on site and it is proposed as orchards which are RNPP3 compliant. Whilst the proposal conflicts with this policy, it complies with the more locally specific and therefore more relevant neighbourhood plan policy RNPP3.
- 6.47 Site Allocations Policy SSP1 New Housing Delivery 2015 to 2027 derives from Local Plan policy SP2 which the local planning authority confirm is out of date. Therefore, any conflict with policy SSP1 should be given less weight in decision making. Policy SSP1 states "in order to meet at least the minimum Core Strategy housing delivery for the plan area over the period 2010 to 2027, new housing delivery should be provided in accordance with Table 2 as set out in columns B and C". This confirms that "at least" 100 dwellings are allocated to Rendlesham. It continues "in addition to sites with planning permission, and to meet at least the Core Strategy housing requirements for the plan area, new housing provision in the form of new site-specific allocations is identified at the following

settlements: Settlement – Rendlesham, Allocation 100”. Again, this confirms that the 100 dwellings allocated to Rendlesham are minimum figures. There are two sites allocated for housing in Rendlesham; SSP12 and SSP13; both for ‘approximately 50 dwellings’; totalling the ‘at least’ 100 dwellings referred to in this policy. In terms the policy allows more than 50 dwellings being developed on either site and there is nothing in policy preventing both sites contributing to a cumulative figure greater than 100 dwellings, in fact supporting text to the policy acknowledges this. It follows therefore that a planning application for 75 new homes in Rendlesham does not necessarily conflict with this policy.

- 6.48 Site Allocations Policy SSP2 Physical Limits Boundaries states that Rendlesham is a “settlement which the Core Strategy has defined as sustainable. The physical limits boundaries identify the parts of those settlements to which new development, particularly new housing development is directed. Accordingly, in principle, proposals for development within the defined physical limits boundary will be acceptable”. The application site is allocated site and within the physical limits boundary meaning this proposal complies with this policy.
- 6.49 Site Allocations Policy SSP12 Land West of Garden Square Rendlesham is the site-specific policy and states that the site is allocated for “approximately 50 units”. It provides criteria against which planning applications will be assessed.
- 6.50 There is at first sight a potential conflict with the wording of policy SSP12 because the number of proposed dwellings is over the “approximately 50” specified in the policy. Notwithstanding, the preamble to policy SSP12 and elsewhere in the development plan, it is clear that the Local Plan housing figures are minimums and not ceiling figures. From that perspective the proposal is achieving what the Core Strategy aims to do, to meet the minimum housing figures. In addition to this the Core Strategy housing figures on which SSP12 is based are out of date and in that case the NPPF requires local planning authorities to respond positively and to boost housing numbers accordingly. Therefore, the conflict with this policy, is merely a numeric one and the ‘over-provision’ actually conforms to wider objectives of the development plan.
- 6.51 Policy SSP12 requires any development to meet the minimum distance from the Water Recycling Centre which the proposed layout has achieved.
- 6.52 Policy SSP12 requires the provision of a flood risk assessment. This has been undertaken and has concluded no adverse flood risk.
- 6.53 Policy SSP12 requires development to accommodate the sewers that cross the site. The layout has

- accommodated the sewers at significant expense to the applicants and includes proposals to realign them. The necessary survey work has been undertaken to ensure this will be achieved without detriment to the existing sewer system.
- 6.54 Policy SSP12 requires there to be adequate capacity in the foul network. The drainage report accompanying this planning application confirms this is the case.
- 6.55 Policy SSP12 requires the design, layout, mix and type of housing to be compatible with the housing and transport objectives in the Rendlesham neighbourhood plan. Parker Planning Services has set out below how this proposal reflects those objectives, in particular the recognition in the neighbourhood plan that the existing housing layout at Garden Square is something which the parish council supports.
- 6.56 Policy SSP12 requires the provision of affordable housing. The planning application proposes 33% affordable housing (25 units) consisting of 48% affordable rented (12 units) and 52% Discounted Market Sales (13 units) in compliance with policy DM2.
- 6.57 Policy SSP12 states that “remaining greenspace should be used for a mix of informal open space suitable for daily dog walking, allotments or orchards in accordance with Rendlesham Neighbourhood Plan policy RNPP3”. A significant area of open space and orchards is provided on the site.
- 6.58 Policy SSP12 requires the provision of a “substantial landscape buffer to the northern and western boundaries where the site abuts open countryside”. The site does not abut open countryside on its northern and western boundaries, and this is clear from the photos in this statement, therefore a substantial landscape buffer is not required.
- 6.59 Policy SSP12 requires that an archaeological assessment be provided, and this has been done. The geophysical report and trenched evaluation confirm no risk to below ground archaeology requiring preservation in situ or justifying the refusal of planning permission.
- 6.60 Policy SSP12 also requires the submission of a transport assessment. In this case a Transport Statement has been provided, although it makes clear that the conclusions show it was not necessary. The transport statement has nevertheless concluded that the planning application meets the requirement of the NPPF to provide for safe and suitable access and not to cause a severe residual cumulative impact on the local road network.
- 6.61 Policy SSP12 states that, in addition to the criteria discussed above, air quality impacts on the AQMA in Woodbridge need assessing. This has been done and the report has confirmed no impact.

- 6.62 This planning application complies with all the criteria of policy SSP12. The requirement for 'approximately 50 units' does not preclude a submission for 75.
- 6.63 The supporting text to policy SSP12 makes the following relevant comments which is material to decision making in this case:
- "The site was formerly allocated for 75 units"
 - "The village has capacity to accommodate more than the 100 homes proposed but is limited predominantly by highway factors"
 - "The main limiting factors are its proximity to the water recycling centre, the sewers that cross the site [...] the number of homes and the area on which development could take place has therefore been reduced to approximately 50".
- 6.64 The pre-amble to policy SSP12 discusses 'limiting factors' and explains these were the reason the earlier allocation of 75 houses on this site was reduced to approximately 50. The applicants have made representations to the local plan process (in regard to emerging policy SCLP12.62) seeking to have these references removed and the figure increased back up to 75. A copy of the representations is included in Appendix 4 for ease of reference.
- 6.65 The reference to 'highway factors' is akin to a reference that was included in draft versions of Policy SSP24 for Bentwaters. The author of this planning statement, acting for the owners of Bentwaters at that time, demonstrated that these references were unjustified and was successful in having them removed through representations made at the Site Allocations Local Plan examination in relation to policy SSP24. At that time no one was making parallel arguments in relation to policy SSP12 and the references to 'limiting factors' remained in the adopted document. The submitted transport assessment confirms that highways factors are not a limiting factor for the 75 new homes proposed.
- 6.66 The cordon sanitaire and the sewers have been considered in the proposed layout and are clearly not 'limiting factors'. In fact the developable area outside of the cordon sanitaire could deliver up to 100 dwellings at otherwise acceptable development densities.
- 6.67 Rendlesham Neighbourhood Plan Policy RNPP3 'Allotments, Orchard and Growing Space Provision' requires "new residential or mixed-use development is required to make provision towards meeting identified local need for allotments, orchards and growing spaces" without expressing a preference for any one type. This planning application conforms to RNPP3 by providing a large area of open space with orchards.

6.68 The table below summarises the proposal's compliance with development plan policies and shows clearly that most policies are complied with and where there are conflicts these are minor, or positive; i.e. there is a context to the conflict which is material.

Policy	Name/Description	Compliant y/n?
SP1	Presumption in Favour of Sustainable Development	Yes
SP1a	Sustainable Development	Yes
SP2	<i>Housing Numbers and Distribution</i>	No but a positive conflict
SP3	New Homes	Yes
SP11	Accessibility	Yes
SP12	Climate Change	Yes
SP14	Biodiversity	Yes
SP15	Landscape and Townscape	Yes
SP16	Sport and Play	Yes
SP17	Green Space	Yes
SP18	Infrastructure	Yes
SP19	Settlement Policy	Yes
SP27	Key Service Centres	Yes
DM2	Affordable Housing on Residential Sites	Yes
DM19	Parking Standards	Yes
DM20	Travel Plans	N/A as confirmed in TS
DM21	Design Aesthetics	Yes
DM22	Design Function	Yes
DM23	Residential Amenity	Yes
DM24	Sustainable Construction	Yes
DM26	Lighting	Yes
DM27	Biodiversity	Yes
DM28	Flood Risk	Yes
DM32	Sport and Play	Yes
DM33	Allotments	No, but complies with RNPP3 instead
SSP1	New Housing Delivery	Yes
SSP2	Physical Limits Boundaries	Yes
SSP12	Land West of Garden Square, Rendlesham	There is a minor numerical conflict but the compliance with the wider objectives of the development plan are considered to override this.
RNPP3	Allotment, Orchard and Growing Space Provision	Yes

Decision Making Approach 2: Determination in Accordance with the Presumption in Favour of Sustainable Development

6.69 In this section Parker Planning Services has taken the conclusion of Approach 1 above that the proposal is in conformity with the development plan and then reviewed NPPF Footnote 6 considerations, undertaken a balancing exercise of benefits versus impacts and then applied the

effects of any other material considerations to the outcome of the balancing exercise in order to draw a Paragraph 11 compliant conclusion.

Development Plan Compliance

- 6.70 The only adverse policy impacts of approving this planning application relate to compliance with policy SP2 which is a positive impact and SSP12 (minor positive).
- 6.71 There are no other materially adverse impacts arising from this planning application including matters of residential amenity, overlooking, landscape, flooding and drainage, ecology, trees, highways, design, density and mix that, when approached proportionately, could justify the refusal of major housing scheme.
- 6.72 Therefore, Parker Planning Services are of the opinion that approached positively the proposal complies with the development plan.

Footnote 6 Considerations

- 6.73 Footnote 6 on page 6 of the NPPF lists policies which may restrict development related to “habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change”.
- 6.74 None of these policies or designations affect the application site and so Footnote 6 is not engaged.

Benefits Versus Impacts

- 6.75 The benefits that would arise from approving this planning application are significant and include:
- Making efficient use of land on an allocated housing site.
 - Boosting the supply of housing in the context of an out of date housing and distribution policy.
 - Providing high quality housing and contributing to the established mix of housing in Rendlesham and the district.

- The sustainable location of the site within the settlement boundary of a key service centre.
 - Contribution towards ongoing housing land supply beyond the minimum Core Strategy delivery figures.
 - Provision of affordable housing above the evidenced need in the district.
 - Very limited environment or landscape impacts.
 - ‘Local finance considerations’ and the contribution towards local infrastructure through the Community Infrastructure Levy (CIL) which is increased through the uplift in the number of houses proposed.
 - The provision of significant on-site pedestrian links to the wider village and village centre.
 - A development density and layout reflecting local character.
- 6.76 No developmental harms were identified in the previous planning application by technical statutory consultees and none are anticipated this time. Having considered carefully the very limited planning policy conflicts discussed above, there are no adverse impacts that would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 6.77 Parker Planning Services are of the opinion that the benefits deriving from this development significantly and demonstrably outweigh any minor or localised impacts, and therefore the balance falls in favour of granting planning permission.

Other Material Considerations to Weigh in the Balance?

- 6.78 The Rendlesham Neighbourhood Plan (RNP) includes several objectives which are not development plan policies but qualify as material considerations.
- 6.79 RNP Objective 3 is *“to ensure that adequate land for housing is provided for sustainable growth to meet the needs of future generations and enable the provision of affordable housing. The RNP would look for the principles contained within it to be included as part of any development brief for the outstanding allocation and any sites that are taken forward”*. Policy SSP12 of the Local Plan does not require a development brief. Nonetheless, as local residents, the applicants of this planning are fully aware of the principles of the RNP and have had due regard to the requirements of the Neighbourhood Plan.

- 6.80 The supporting text to Objective 3 makes it clear that *“the key tool for taking forward sites for development will be the Local Plan. The objectives and information within the RNP will guide SCDC, SCC and developers on housing density, land use, design and the infrastructure required to support the increase in population by reflecting the aspirations of Rendlesham”*. Policy SSP12 was written after RNP Objective 3.
- 6.81 In the supporting text to Objective 3, the RNP states that *‘CIL contributions will be the means by which provision of land in the District Centre to provide for the community’s needs’* rather than any specific contribution via planning applications. The supporting text to Objective 3 is clear that *“the potential for Rendlesham to encompass housing growth exists”*.
- 6.82 RNP Objective 3a states *“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. Whilst new housing has introduced larger properties into the village, new housing should have regard to the sustainable mix of housing as identified in Appendix N”*.
- 6.83 It is assumed that reference to RNP Appendix N should have been a reference to Appendix O of the RNP which describes 9 housing areas with distinct urban character that contribute to the ‘sustainable mix’ described in Objective 3a. Character Area E is described as *“Area E – This development within Rendlesham is constructed in accord with the principles of Maharishi Sthapatya Veda and provides a mix of low density detached, semi-detached, maisonettes and flats. Sufficient off-road parking to avoid congestion or obstruction of footways”*.
- 6.84 Area E is Garden Square and Gardenia Close; built to the same design principles as this scheme. As this development follows the design of a character area favoured by the neighbourhood plan this proposed housing scheme complies with the requirements of Objective 3a.
- 6.85 RNP Objective 3b states *“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”*. The supporting text to Objective 3b includes *‘best practice design principles’*; the majority of which this development proposal achieves; sufficient off-road parking to Suffolk County standards, significant open green spaces and high-quality landscaping to be incorporated. This scheme meets the principles of Objective 3b.
- 6.86 RNP Objective 3c states *“the street scene is an important part of the aesthetics of any housing*

development and development should be guided by the design principles in this NP. Inadequate parking can lead to overcrowded street scenes and inconsiderate parking on pavements, causing obstruction to pedestrians and cyclists. The guidance provided in this NP should be used to ensure provision of on-street landscaped parking bays as well as off-road parking for residents". The supporting text to Objective 3c summarises the 'ideal street scene' which consists of:

- Sufficient off-road parking
- On-road landscaped parking bays
- Landscaping
- Open green spaces
- Grass strips between road and footway
- Low hedges
- Brick wall or panel fencing where gardens front roads
- Open front gardens and
- Natural fencing or timber post and rail

6.87 The proposed scheme meets all the requirements of an ideal street scene, with the exception of landscaped on-road parking bays. On-road landscaped bays, in this case, are better provided for with off-road parking. The proposed scheme is comparable to the scheme for Gardenia Close and Garden Square which the RNP describes as having "Sufficient off-road parking to avoid congestion or obstruction of footways".

6.88 RNP Objective 3d states "*Sustainable transport is an important aim and off-road provision should be made on artery roads in developments to promote the use of cycling and shared space schemes within the village. Good examples of this can be found in Rendlesham and these principles should be followed when designing new housing schemes*". This proposed scheme includes significant provision of cycleways and footways and a bus timetable in compliance with this Objective.

6.89 RNP Objective 3e is "*To ensure less tangible infrastructure is provided for. This list is not exclusive: telephony, sewage, and services such as doctors, dentist and family services*". The supporting text makes clear that it is "*service providers [and not developers who] need to ensure provision is commensurate with the growing population*".

6.90 RNP Objective 3f states "*to ensure that local homes are built for local people so that people who live*

and work in Rendlesham can afford to stay in the village when personal circumstances change e.g. the sale of a rented property, leaving home, downsizing for older people or finding more suitable accommodation because of disability". The supporting text acknowledges that for Rendlesham, affordable housing *"is expected to be provided through SCDC's policy DM2"*. This proposal provides 33% affordable housing in compliance with policy DM2.

- 6.91 This planning application conforms to the housing objectives of the Rendlesham Neighbourhood Plan and the applicant's previous development at Gardenia Close and Garden Square is described in the Neighbourhood Plan as an example of a residential development that provided *"Sufficient off-road parking to avoid congestion or obstruction of footways"*.
- 6.92 Emerging local plan policy SCLP3.1 states that the Council will "deliver an ambitious plan for growth2 and will "significantly boost housing supply". These emerging policy objectives support the provision of additional land on site SSP12. Policy SCLP3.1 states that the strategy for growth will "create and enhance sustainable and inclusive communities" and defines how this will be done through the "delivery of new Garden Neighbourhood, road and rail opportunities, strategic employment, market town strategies and appropriate growth in rural areas". Inclusivity, according to the emerging plan, is not determined by who lives in future housing development.
- 6.93 Emerging local plan policy SCLP3.2 includes Rendlesham in the emerging settlement hierarchy as a 'Large Village' meaning it is a sustainable settlement capable of accommodating growth.
- 6.94 Emerging local plan policy SCLP3.3 states that "new development within defined settlement boundaries will be acceptable in principle, subject to consideration of other relevant policies of the development plan". The application site is wholly within the settlement policy in compliance with this emerging policy.
- 6.95 Emerging local plan policy SCLP3.5 states that "all development will be expected to contribute towards infrastructure provision to meet the needs generated". This development will generate CIL contributions in the order of £700,000 of which approximately £175,000 is available to spend on local infrastructure because Rendlesham has a made neighbourhood plan.
- 6.96 Emerging local plan policy SCLP5.1 relates to Large Villages and states that "residential development will be permitted within the defined settlement boundaries where it is [...] of a scale appropriate to the size, location and character of the village". The application was historically allocated for 75 dwellings and the developable area is capable of accommodating around 100 dwellings at a development density of around 35dph which is comparable to neighbouring development densities

in compliance with this emerging policy.

- 6.97 The emerging local plan states at paragraph 5.46 that “to achieve a greater mix of housing types, the starting point will be that all developments of 5 or more residential units will be expected to provide a mix of house types and sizes”. Emerging local plan policy SCLP5.8 states that “proposals of 5 or more units should provide for a mix of sizes and types based upon table 5.1”. The mix graph in Section 3 above shows how the proposed housing mix compares to adopted policy but also this emerging policy. Of interest is the increase in the requirement of larger dwellings, contrary to the requirements of the local planning authority through the recent pre-application exercise.
- 6.98 Emerging local plan policy SCLP5.9 requires affordable housing of 33% which matches the offer in this planning application.
- 6.99 Emerging local plan policy SCLP8.2 states that “new residential development will be required to contribute to the provision of open space and recreational facilities in order to benefit community health, well-being and green infrastructure” and this proposal includes large areas of open space in compliance with this emerging policy.
- 6.100 Emerging local plan policy SCLP9.2 states that “proposals should improve the efficiency of heating, cooling and lighting of buildings by maximising daylight and passive solar gain through the orientation of buildings”. The proposed layout of housing in this scheme has been ahead of the curve in this respect. The east-west orientation of the houses maximises natural light and solar gain in the initial portions of the day but the south façade with its relatively few windows helps to reduce solar heating at the height of the day. This is discussed in greater detail in the design and access section above.
- 6.101 Emerging local plan policy SCLP9.6 states that “Developments of 10 dwellings or more, or non-residential development with upwards of 1,000 sq. m of floorspace or on sites of 1 hectare or more, will be required to utilise sustainable drainage systems, unless demonstrated to be inappropriate”. The FRA which accompanies this planning application conforms to this emerging policy.
- 6.102 Emerging local plan policy SCLP10.1 requires new development to maintain and enhance green infrastructure and biodiversity. This proposed scheme includes significant area of open space and landscaping in compliance with this emerging policy.
- 6.103 Emerging local plan policy SCLP10.4 states that “proposals should include measures that enable a scheme to be well integrated into the landscape and enhance connectivity to the surrounding green infrastructure”. This proposed landscaping scheme for this development includes significant area of

green space and green infrastructure planting linking the surrounding woodland through the site supporting biodiversity.

6.104 Emerging local plan policy SCLP11.1 includes a number of criteria intended to steer design quality in new developments and states that permission will be granted where proposals meet, amongst others, the following criteria:

- Support inclusive design environments which are distinctive
- Complement local character and respond to local context – the proposal matches the neighbouring development
- The layout should fit in well with the existing neighbourhood layout – again, the proposal matches the neighbouring development
- The height and massing of developments should be well related to that of their surroundings – again, the proposal matches the neighbouring development
- Make use of high-quality materials appropriate to the local context
- Have well integrated car parking and landscaping which create a high-quality public realm

6.105 Emerging local plan policy SCLP12.62 is intended to replace policy SSP12 and includes much the same criteria and supporting text as policy SSP12. The applicants have made representations to the local plan process and the representations are included in Appendix 4 which include objections to the quantum of development and the 'limitations' used to justify the quantum of development. The outstanding objections to the local plan are a material consideration in terms of the quantum of development and any intention by decision makers to use it to resist development in excess of the 'approximately 50 dwellings' cited in this policy and SSP12.

6.106 This planning application conforms to the policies of the emerging local plan. In fact, certain policies including those of mix, design and housing orientation are considered to have moved towards the developers position and are therefore supportive of the proposal should it be determined at planning appeal.

6.107 There are no other material considerations which counter the planning balance which favours approving this planning application.

6.108 The revised NPPF emphasises delivery of housing. The applicants have a proven local track record of delivering housing in Rendlesham. Granting planning permission for this proposal would ensure delivery of a significant proportion of the Local Plan's housing allocations to Rendlesham as part of a very high-quality scheme; the evidence for which can be seen in Garden Square and Gardenia Close.

Planning Policy Conclusion

6.109 The local planning authority acknowledge that the Paragraph 11 tilted balance is engaged because their housing supply and distribution policy is out of date. Parker Planning Services has weighed up the Development Plan policy compliance and consider that the only impacts which arise are to policies SP2 (housing numbers and distribution which is out of date) and SSP12 (by proposing a higher number of dwellings than in the policy).

6.110 The impact with SP2 and SSP12 is a positive one because providing more housing than the minimum provision sought by the development plan will help the local planning authority 'boost housing supply' beyond the Core Strategy minimum figures on a sustainable site.

6.111 The proposed development would be in conformity with all other relevant Local Plan policies.

6.112 The proposed development will contribute to the three dimensions of sustainable development by performing the following roles:

Economic

- Employment in the construction phase
- Support by way of patronage to local facilities and services
- An influx of new residents some of whom may set up new local businesses
- Contributions to local infrastructure by way of the Community Infrastructure Levy (CIL) to the order of approximately £700,000 of which £175,000 will be directed locally.

Social

- Provision of affordable housing and contribution to the mix and tenure of housing in a sustainable settlement
- Support by way of patronage to local facilities and services
- An influx of new residents some of whom may join local clubs and societies
- Maintaining and enhancing settlement character and residential amenity

Environmental

- Efficient use of allocated land of low environmental value
- Minimal environmental impacts arising from development

6.113 Based on the lessened weight to be given to the local planning authority's housing supply and distribution policy and the opportunity to contribute to ongoing housing supply in a sustainable location with minimal impacts in a location that is sustainable, Parker Planning Services consider this proposal represents sustainable development in its simplest and clearest form and should be approved without delay.

7.0 Heads of Terms (Advised by Birketts Solicitors LLP)

7.1 This section sets out the items anticipated to be delivered through Section 106 and the Community Infrastructure Levy.

7.2 Planning obligations mitigate the impact of development to make it acceptable in planning terms. Obligations should meet the statutory tests in the Community Infrastructure Levy Regulations 2010 and the policy tests in the Framework.

7.3 The Framework states:

Planning obligations must only be sought where they meet all of the following tests (Set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010):

- a) necessary to make the development acceptable in planning terms;*
- b) directly related to the development; and*
- c) fairly and reasonably related in scale and kind to the development.*

Affordable Housing

7.4 Affordable Housing of 33% or 25 units:

- 12 homes or 48% for build to rent (affordable private rent – 20% rent discount relative to local market rents inclusive of service charge and lifetime tenancies); and
- 13 homes or 52% for discounted market sale.

Public Open Space

7.5 Transfer to and ongoing maintenance of public open space by a management company.

Community Infrastructure Levy

7.6 The proposed development will be subject to Community Infrastructure Levy. Using the local planning authorities own online CIL calculator the anticipated CIL contribution arising

from the development would be around £700,000 of which around £175,000 would go to the parish council because they have a made neighbourhood plan.

- 7.7 25% of this figure will be allocated to the Parish Council by the District Council. This is higher than the baseline 15% because Rendlesham has a Made neighbourhood plan.
- 7.8 By comparison the likely CIL figure that would arise from a development of 50 dwellings could be in the region of the lower figure of £450,000.

Recreation Avoidance Mitigation Scheme (RAMS)

- 7.9 In conjunction with the submitted Habitats Regulations Assessment the Council's RAMS a contribution is to be agreed with the local planning authority. Whilst it remains unclear whether RAMS has been formally adopted by the local planning authority it is expected that it will have been by the time this application is determined. Clearly if the scheme has not been adopted the local planning authority will need to consider whether it is proper to require the applicant to adhere to the scheme.

Bridleway Link

- 7.10 Provision of a bridleway link within the site along the eastern boundary (location to be confirmed) with a contribution in the region of £8,071.25 payable to SCC.

Sustainable Transport

- 7.11 Transport Information Board Contribution - £15,000 payable to SCC for provision of a solar-powered real time screen at the Redwald Drive stop opposite Sparrowscroft Road.

Note

- 7.12 Although the refusal of DC/18/2371/FUL referred to a "failure to provide a Travel Plan, in accordance with SCC guidance", the scale of the development does not require a Travel Plan and SCC proposed that travel plan measures would be secured via condition.

8.0 Conclusion

- 8.1 This planning application proposes 75 new homes on land long-allocated for residential use within a key service centre where the local planning authority acknowledge there is room for growth beyond the current allocations subject to detailed considerations.
- 8.2 This planning application has benefitted from significant further pre-application engagement with the local planning authority which has shown that certain of the previous reasons for refusal were unfounded, but it has also provided additional design input which has led to an improved scheme in terms of design, overlooking and layout.
- 8.3 This planning statement has tested the proposal via two different method of analysis; against the development plan and via the tilted balance. Either way Parker Planning Services are of the opinion that the planning application meets policy requirements and that the benefits derived from development significantly and demonstrably outweigh the very minor impacts from the development.

Appendix 1a

**ESSEX OFFICE****PHONE: 01603 516319**

Parker Planning Services Ltd
Moulsham Mill
Parkway
Chelmsford
Essex
CM2 7PX

NORFOLK OFFICE**PHONE: 01603 516319**

Parker Planning Services Ltd
Orchard House
Hall Lane
East Tuddenham
Norfolk
NR20 3LR

SUFFOLK OFFICE**PHONE: 01284 336348**

Parker Planning Services Ltd
Northgate Business Centre
Bury St Edmunds
Suffolk
IP33 1HQ

Planning Dept.
Suffolk Coastal District Council
East Suffolk House
Station Road
Melton
Woodbridge
IP12 1RT
(Sent Via Email)

Contact: Mr. Jason Parker
Phone: 01284 336348
Email: jason@parkerplanningservices.co.uk
Office: Suffolk Office
Our Ref: PS-2018-0645
Date: 16 November 2018

Dear Sir / Madam,

Pre-application Advice Request in Relation to a Planning Application for Residential Development on Land West of Garden Square (Site SSP12 in the Suffolk Coastal Local Plan), Rendlesham, Suffolk

On behalf of our clients Capital Community Developments Ltd. we are hereby requesting pre-application discussions with the Local Planning Authority for a proposed development of up to 75 dwellings on the land currently allocated in the local plan and now referred to as SCLP12.57 (previously SSP12).

This request for pre-application advice follows a previous refused planning application (ref. DC/18/2374/FUL) and, necessarily, the pre-application discussions will need to focus on the reasons for refusal and other matters of importance to the local planning authority, the parish council, and consultees, as expressed in that planning application.

The applicant has studied carefully the reasons for refusal and has tried in good faith to address the concerns of the local planning authority to the best of its ability. The applicant is in the process of amending the site masterplan and will provide a draft of this prior to the meeting.

In our opinion the principal matters for discussion are:

- The principle of development and the quantum of housing.
- Whether the development will create an inclusive and sustainable community.
- The mix of different bedroom properties.
- The provision of Affordable Housing.
- Design – whether the development will create a safe and socially interactive environment.
- Design – overlooking, overshadowing, a dominating effect.
- Further information on the Recreational Avoidance Mitigation Strategy.
- Initial discussion on planning contributions.

We look forward to discussing these matters in greater depth at a meeting with the local planning authority. In order to inform those discussions we have provided further commentary below on the principal matters listed above.

Yours sincerely

Jason Parker MRTPI
Managing Director and Head of Planning
Parker Planning Services Ltd

Based in East Anglia and dealing with Planning Proposals and Appeals throughout the UK

Parker Planning Services Ltd
Registered in England No. 07752807
Registered Office: 17 Waterloo Road, Norwich, Norfolk, NR3 1EH

Principle of development and the quantum of housing

It is true that the local plan currently allocates *approximately 50 units* to the site, but it is important to bear in mind that from 1996 to 2014 the site had an allocation of 75 units, reference the Bentwaters Redevelopment Strategy Report of November 1996, the New Rendlesham Master Plan of April 2003, and the SHLAA of November 2010.

In the SHLAA of May 2014 the allocation was reduced to 50 units. In the Preferred Options consultation of October 2015 the reasons given for the reduced allocation were the exclusion zone around the Water Recycling Centre and the easements over the sewers that cross the site.

In August 2016 Persimmon Homes made a representation (no. 7901) as part of the Proposed Submission Document that, taking into account the exclusion zone and the easements over the sewers, the nett developable area was 3.2 ha, and based on a normal average density of 30 dwellings per hectare, the site could accommodate up to 100 dwellings.

In the Site Allocations and Area Specific Policies document of January 2017, it is stated that the village has capacity to accommodate more than 100 homes currently allocated to it (two sites with approximately 50 units each), but the numbers are limited predominantly by highway factors.

In the Transport Assessment that accompanied the earlier planning application the consultant concluded that there were no material adverse impacts on highway safety or highway capacity from the proposed development of 75 units.

Pre-application advice given by the local planning authority in January 2018 stated that the "principle of the proposal [was] considered to be acceptable [subject to] the mix of dwellings closely relating to the local plan mix requirements". No exceptions made in relation to the number of dwellings proposed.

The applicant will need an update from the LPA on the status of the local plan policy SP2 and the 'tilted balance' in the context of Government planning policy to significantly boost housing supply, make efficient use of land identified for the purpose and to deliver a wide choice of homes.

The applicant respectfully asks the local planning authority to also consider the nett developable area and the highway factors in the course of making their decision on the number of dwellings. If the number of dwellings is significantly lower, this will undermine the viability of the development.

Whether the development will create an inclusive and sustainable community

The local planning authority will be well aware that Objective 3 of the core strategy is "To provide for **the full range of types and locations of new homes to meet the needs of existing and future residents of the district**". Strategic policy SP3 states that "The strategy will be to increase the stock of housing to provide for the full range of size, type and tenure of accommodation to meet the needs of the existing and future population, including Gypsies, Travellers and Travelling Showpeople".

Reference is made in reason no.2 of the decision notice to Paragraph 8 of the NPPF (now Paragraph 8b in NPPF2). Paragraph 8b states "a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and **range of homes** can be provided to meet the **needs of present and**

future generations". Reference is made also to Strategic Policy SP1 which states that an element of the core strategy is to "create and promote inclusive and sustainable communities in both urban and rural locations".

Against this background the applicant wishes to provide the local planning authority with further information about the local community.

The new development is an extension of the existing development on Garden Square and Gardenia Close. The residents of the existing development are from diverse economic and social backgrounds. They share a common goal to live in a property built to a specification that meets their needs, and to live a healthy lifestyle. They have lived in the area as long as or longer than other residents of Rendlesham. Many are Suffolk born and bred. They are also very actively engaged in the wider community, for example in the parish council, Rendlesham Fair, Greener Rendlesham, St Felix Church, local choirs, different faith groups, various charities, volunteering, and many other activities.

This is a vibrant, inclusive community that makes a rich contribution to the wider community. There is no evidence that the existing community is not inclusive or sustainable, and it is significant that the parish council supported the earlier application, and did not share the planning officer's concerns.

The applicant, like any other developer up and down the country, has an imperative to sell the properties. The properties will be available on the open market. Over the last 10 or so years the applicant has received many enquiries. However this does not constitute a waiting list of definite buyers.

Most developments have a theme and a target market, for example retirement villages, live-work units, young professionals with families, students, etc. For example, the marketing for the new units at Snape Maltings may feature the attractions of the concert hall, the complex of shops, galleries and restaurants, and the musical and cultural events during the year.

Similarly the proposed new development has an environmental theme of 'healthy living and healthy buildings' and offers the benefits of buildings constructed according to certain architectural principles such as orientation of buildings, placement of rooms, proportion and measurements, natural non-toxic materials, alternative energy sources, and environmentally-friendly sustainable technologies.

The mix of properties

The applicant has noted the planning officer's concern to bring the mix of properties on the new development closer to the general mix in Table 3.6 supporting Policy SP3, specifically by providing more 3-bedroom properties and fewer 4+-bedroom properties. The applicant has sought to address this in the revised masterplan.

The provision of Affordable Housing

The applicant accepts that the standard policy aim is to provide 33% affordable housing and to provide this in a mix of 70% affordable rented, 30% shared ownership and/or shared equity. However national planning policy and guidance recognise that other factors also need to be considered, such as the viability and deliverability of new developments.



For the earlier planning application the applicant submitted a detailed Economic Viability Assessment arguing for 27% affordable housing (20 units out of 75), and for this to be provided as shared equity units. This exceeds the evidenced need of 24% referenced in the Core Strategy.

As well as discussing the proposed tenure, location and mix of the affordable properties (in light of recent definitions in NPPF2) we are keen to understand the local planning authorities position on percentage provision of affordable housing at the pre-application meeting, after which a revised EVA could be provided for feedback from the housing development manager.

Design – whether the development will create a safe and socially interactive environment

The members of the applicant's team are all residents of Rendlesham, and the applicant fully supports the planning objective for the new development to create a safe and socially interactive environment. The applicant has identified 21 more detailed points under this heading in the main body of the planning officer's report (pages 18, 19, and 20), and has attempted to address each of these points in the revised site masterplan.

Design – overlooking, overshadowing, a dominating effect

Similarly, the applicant shares the planning officer's concern for the new development not to cause overlooking, overshadowing or a dominating effect. The applicant has identified 5 more detailed points under this heading in the main body of the planning officer's report (pages 21 and 21), and has attempted to address each of these points in the revised site masterplan.

Further information on the Recreational Avoidance Mitigation Strategy

The applicant is willing to provide further information on whether or not the new development is likely to have a significant effect on ecology and the Suffolk Recreational Disturbance Avoidance and Mitigation Strategy, to demonstrate on site mitigation, and to make a financial contribution should this be deemed necessary or relevant.

We would propose that the applicant's ecologist attends part of the pre-application meeting in order to discuss this.

Initial discussion on planning contributions

The applicant is willing to provide the planning contributions that are reasonably required and proposes to agree heads of terms for these planning contributions at an early stage, prior to the granting of any planning permission, so that the legal agreements can be put into place more smoothly in the event that planning permission is granted. Please note that we are seeking to agree with the Parish Council their requirements for the open spaces in terms of policy RNPP3 (allotments, orchards and growing spaces) ahead of any resubmission.

Appendix 1b



Our Ref: DC/PREAPP/18/4778
Date: 29th November 2018
Case Officer: Jane Rodens
Dial Direct: (01394) 444505
E-mail: jane.rodens@eastsoffolk.gov.uk

AGENT

Parker Planning Services Ltd
Northgate Business Centre
10 Northgate Street
BURY ST EDMUNDS
Suffolk
IP33 1HQ

APPLICANT

Parker Planning Services Ltd
Northgate Business Centre
10 Northgate Street
BURY ST EDMUNDS
Suffolk
IP33 1HQ

Pre-application Planning Advice

Proposal: The site is allocated for residential development. The proposal is currently for the development of UP TO 75 dwellings, car parking, open space, hard and soft landscaping and associated infrastructure and access.

Address: Land North Of Gardenia Close And, Garden Square, Rendlesham, Suffolk

Date Valid: 26th November 2018
File ref: DC/PREAPP/18/4778
Expiry Date: 23rd December 2018

Case Officer: Jane Rodens
(01394) 444505
jane.rodens@eastsoffolk.gov.uk

Dear Parker Planning Services Ltd,

Your request for pre-application planning advice described above has been received.

Receipt is acknowledged of the sum of £5400.00 in payment of the prescribed charges for the above proposal. A tax receipt for V.A.T registered persons is attached.

It should normally be possible to provide the advice within the 28 day target period shown as the expiry date above. If you have not heard from us or received the formal letter of advice by that date, please do not hesitate to contact this office.

Yours sincerely,

Philip Ridley BSc (Hons) MRTPI
Head of Planning & Coastal Management
Suffolk Coastal and Waveney District Councils

Planning and Coastal Management

Suffolk Coastal District Council, East Suffolk House, Station Road, Melton, Woodbridge, IP12 1RT
Telephone: (01394) 383789, E-mail: d.c.admin@eastsoffolk.gov.uk
DX: Woodbridge 41400
Website: www.eastsuffolk.gov.uk

Appendix 1c

Subject: FW: Rendlesham pre app DC/PREAPP/18/4778
Attachments: Site masterplan HH 05 12 18.pdf; Pre app meeting agenda notes 11_12_18.pdf
Importance: High

From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>

Sent: 13 December 2018 17:27

To: 'Jane.Rodens@eastsoffolk.gov.uk' <Jane.Rodens@eastsoffolk.gov.uk>

Subject: Rendlesham pre app DC/PREAPP/18/4778

Good afternoon Jane,

Thank you for meeting with us with regard to the Rendlesham site. Attached is a set of meeting notes and action points for you to review and confirm please. It is a version of the agenda document I left with you with the notes section filled in. Items highlighted in yellow are action points for you or us. With regard to our action points information on mix is below and I have attached a layout plan for comments. Can I suggest we send this plan backward and forwards a few times until issues such as boundaries and windows which you talked through at the meeting are generally resolved? The pre-app deadline is 23rd December – in terms of getting info back from your housing colleague, reviewing the layout plan and writing the pre-app up can we assume you have sufficient time set aside in your workload for this please?

Mix

- CS mix requirement
3.50 As a general rule across the district the proportions shown in Table 3.6 should be sought in terms of house size. These have emerged from the Local Housing Assessment. The achievement of these targets will be monitored.

Table 3.6 Target proportions of house sizes

Bedrooms	1	2	3	4+
Open market housing	6%	32%	39%	22%
Affordable housing	43%	31%	16%	11%
All sectors	13%	32%	35%	20%

- Previous mix:

Bedrooms	1	2	3	4+
Open Market Housing	4.5%	24%	29%	16.5%
Affordable housing	32%	23%	12%	8%
All sectors	9%	27%	17%	22%

- Proposed mix:

Bedrooms	1	2	3	4+
Open Market Housing	5%	24%	29%	17%
Affordable housing	32%	23%	12%	8%
All sectors	10%	24%	26%	15%

- Emerging policy mix:

Table 3.1 Housing need by size, source: Strategic Housing Market Assessment Part 2 (May 2017)

Number of bedrooms	Percentage of District wide need
1	13%
2	29%
3	30%
4	28%

Meeting of 11th December 2018. Attendees:

- Applicants CCD Ltd. Representatives. Anthony Hardy and John Renwick
- Parker Planning Ltd. Representatives. Jason Parker and Steven Bainbridge
- SCDC Representatives: Jane Rodens (JR)
- The Landscape Partnership Ltd. Mr. Nick Sibbett.

The purpose of this pre-application meeting is to discuss the planning matters related to the development of Site SSP12 in Rendlesham.

Agenda item	Notes	Lead
1 Ecology and HRA	JR to provide NS with details of the RAMS scheme which JR has said has been implemented in Suffolk Coastal. There were no other significant ecology matters.	NS
2 SSP12, Local Plan and housing numbers	JR acknowledged that SP2 is out of date and the NPPF Para 11 tilted balance applies. JR acknowledged that in respect of Para 11 the "most important" policies in this case are SP2, SP27 and SSP12 but added SP1 and SP1a. JR acknowledged that in the event that SSP12 is regarded by the LPA as a restrictive policy in terms of housing numbers then, by virtue of it being a derivative policy of SP2 and the Core Strategy, then it must be 'infected' by the out of date status of SP2 (and the higher housing requirement DPA figures in the Aldeburgh appeal decision) and be out of date itself and therefore of less weight – insofar as any 'numbers restriction' might be implied or applied. JR also acknowledged that if SSP12 is not 'restrictive' then the first 50 or so dwellings could be seen as compliant with the policy and the subsequent 25 or so as windfall and therefore be plan compliant that way. Either way JR was content that 75 dwellings was acceptable in principle having better understood why the 'limiting factors' referred to in the pre-ambles of SSP12 were either never limiting factors or were shown in the previous application to have been addressed therefore lifting the 'restriction'.	SB
3. Homes, Residents, Mix and Affordable Housing	JR accepted that it is a developers prerogative to design houses to meet a specific and niche market demand if they choose and that this was not a planning matter but a matter for the market. JR accepted that having a 'waiting list' was not a planning matter and was no different to another developer selling 'off plan'. JR accepted that there was no mechanism to somehow restrict the sale or occupancy of the dwellings to a specific group and that any attempt to categorise a group based on a set of shared principles and then claim they were not socially inclusive was problematic because residents (being from a wide range of backgrounds) might also have shared interests with other groups or organizations to which they should not be 'categorised'. JR was content this was "no longer an issue". The applicants were to provide further commentary on this in the planning application and beforehand if JR would like to receive it.	JP

	<p>The applicants were to provide the latest housing mix info for feedback.</p> <p>JR is to obtain further guidance from her Housing colleague on their consultation response to the previous application and also to put it to them that if they push for different less viable tenures then on sound viability grounds this would probably reduce the overall affordable housing offer.</p>	
4. Design	<p>The applicants are to provide a copy of the latest layout plan and by exchange with JR review and reflect suggested minor changes to such things as boundaries, window positions etc.</p>	AH/ JR

Appendix 1d

Subject: FW: Rendlesham pre app DC/PREAPP/18/4778

From: Jane Rodens <Jane.Rodens@eastssuffolk.gov.uk>

Sent: 19 December 2018 11:20

To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

Sorry for the delay in getting back to you and not being available yesterday.

Thank you for the meeting notes, I will add them to my own.

I have asked affordable housing the question about the additional information as detailed below and the meeting notes.

As detailed below, you have asked for information to be provided before and after the Christmas break. I cannot guarantee that I can provide the information before Christmas as tomorrow is planning committee, I have items to take.

I will try and provide the information that you have requested after Christmas, but I will let you know if I require any further information.

Regards

Jane Rodens BA (Hons) MA MRTPI

Area Planning and Enforcement Officer

Planning

Suffolk Coastal and Waveney District Councils

From: steven@parkerplanningservices.co.uk [mailto:steven@parkerplanningservices.co.uk]

Sent: 18 December 2018 14:40

To: Jane Rodens

Subject: FW: Rendlesham pre app DC/PREAPP/18/4778

Importance: High

Good afternoon Jane,

Further to our recent pre-app meeting, email of 13th Dec and attempts to telephone you yesterday and today, we are mindful of the limited time before the pre-app deadline can we suggest dividing the pre-app advice on the following basis: the first part to be provided by the end of this week and the second part asap after the Christmas break and by way of an extension of time and additional design meeting if required.

Part 1 before 5pm Friday 21st Dec

- With reference to our pre-app letter, meeting notes and with senior officer oversight as necessary, provide feedback on the principle of development and the quantum of housing
- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

Part 2 after Christmas

- The provision of Affordable Housing with additional feedback from your Housing dept.
- Design – whether the development will create a safe and socially interactive environment.
- Design – overlooking, overshadowing, a dominating effect.
- Initial advice on planning contributions.

Appendix 1e

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 29 January 2019 14:11
To: 'steven@parkerplanningservices.co.uk'
Cc: planning
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

Thank you for your email, I will put in the information below.

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505

On 1 April 2019, we will become East Suffolk Council – a new 'super district' authority, serving the residents, businesses and communities of both Suffolk Coastal and Waveney. Importantly, it will be business as usual and the high quality services you receive from us will not be affected.

www.eastsuffolk.gov.uk



From: steven@parkerplanningservices.co.uk [mailto:steven@parkerplanningservices.co.uk]
Sent: 25 January 2019 18:00
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Good afternoon Jane,

Thank you for sending the first part pre-app advice over. We would like to clarify a few points from the first part advice and then below this you will see some discussion and further information on the second part. It would be easier for us to follow if your answers are inserted underneath the questions. We would be happy to discuss any of this on the telephone if anything is unclear.

First part

- *With reference to our pre-app letter, meeting notes and with senior officer oversight as necessary, provide feedback on the principle of development and the quantum of housing*

- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
 - Provide further information on the Recreational Avoidance Mitigation Strategy.
 - Provide feedback on the mix of different bedroom properties.
1. In respect of your advice on the quantum of development please confirm (yes/no) the following adaptation of your sentence: "As discussed within the meeting this level of development on the site may be acceptable where other material planning considerations are taken into account **in the planning balance** and would not impact on the future and current occupants in and around the site." This is important because at the meeting it was agreed that the tilted balance applies because SP2 is out of date. It would also be useful if you could set out some of the material considerations such as the 'additional' housing being windfall and/or an efficient use of land in a sustainable location etc. Also if it helps we discussed the following (which relates to the attached developable area plan) at the meeting and were expecting a specific response to it: The site is physically capable of accommodating up to 100 units, let alone 50 or 75. Please find attached a site plan showing the nett developable area. The gross area is 51,020 m2. The landscape buffer, the easements over the sewers, and the exclusion zone account for 18,664 m2. If we deduct this, this leave a nett developable area of 32,356 m2. If we use a reasonable density of 30 dwellings per hectare, this could accommodate up to 100 dwellings. The numbers were reduced from 75 units to 50 units because of the landscape buffer, the easements and the exclusion zone. Based on the evidence this is not justified and we are making comments to the local plan consultation to this effect. But please can you tell us whether there were any specific reasons why 75 units would not be an efficient use of land; land that has space for 100 units?

The planning balance refers to the material planning considerations, if 75 dwellings cannot fit in because there is overlooking or amenity issues, or the design of the layout is unacceptable, then the amount of dwellings would need to be reduced to overcome these problems. More dwellings may be acceptable if it can be proven that there is no adverse effect on the future and current residents of the site.

As you state above there is still a requirement for the provision of the sewerage network, treatment plant, landscape buffer, which are all requirements of the policy, this then reduces the amount of dwellings further. This may have been a representation at the Local Plan and the new local plan but this is the policy as it currently stands, if the policy changes in the new local plan then this would be a different matter. However, at this stage the New Local Plan policy for the site SCLP12.62 is the same as the current policy. Therefore still keeping the amount of dwellings at approximately 50 dwellings, subject to the above.

2. Please give us some feedback on the point made at the meeting that the 'limiting factors' for Rendlesham referred to in the Site Allocations and Area Specific Policies DPD were either not limiting factors in the first place or have been shown not to be limiting factors through subsequent assessment.

I am assuming that the limiting factors are the need for sewerage network, treatment plant, landscape buffer. These has come about through the development of the policy and are criteria in the policy and therefore should be applied to the application.

3. Please confirm we are correct in our understanding (yes/no) that Table 3.6 (mix) of the Core Strategy includes target figures, is referred to as a "general rule" and is not in policy SP3 but rather is supporting text to it. Please note in Revision MM we are closer still to the desired target mix in the local plan and would appreciate your thoughts on this.

These are target figures and developments will be looked upon favourably where they meet and are closest to it.

4. The link you provided for RAMS information says repeatedly that the scheme "will be" required. But when? At the meeting Nick Sibbett said he had not seen that the scheme had actually been formally implemented yet. You said you would provide evidence that it had been implemented (an action point on the attached meeting note). It appears that RAMS is still not formally in place yet. Please confirm that you agree (yes/no) with your Babergh colleague's statement on RAMS (below) and that therefore RAMS was not in place in 2018, is not in place yet, but probably will be by the time we submit:

From: Clare Dawson <Clare.Dawson@tlf.uk.com>
Sent: 10 January 2019 07:14
To: Nick Sibbett <nick.sibbett@tlf.uk.com>
Subject: RE: Latest position with RAMS for European sites

Hi Nick

The Suffolk Coast and Estuary RAMS has been through a final proof read and we are awaiting the final strategy as we speak.

Once we (all five Local Authorities) are in agreement that the Strategy is complete we will then be able to go through the process to get it endorsed.

Information regarding the RAMS will be up online as soon as I know the Strategy is ready – hopefully in the next month or two

If you have any further questions please do not hesitate to ask

Kind regards

Clare

Clare Dawson
Strategic Planning Policy Officer

I cannot comment on the above email, but I have been informed, and have been applying RAMS to all applications that refer to development of new dwellings and holiday lets, by the Team Leaders and the Head of Planning that are to apply this to all applications.

5. You said you would get comments from the Housing Officer (an action point in the attached meeting note) – are these yet to be received? In his consultation response of 20 August 2018 Peter Goodrick, the Housing Development Manager, called for the Council to carry out its own viability report to check “concerns” about land values, build costs and open market values “In my opinion a 2nd viability report should be undertaken on this site for the Council”. In the absence of such a report or further feedback from him it is difficult for us to understand what was actually wrong with the previous viability report.

I did and they are put into the pre-application sent to you, it is recommended that a new viability report is submitted, there are questions raised over the figures and the costs of the site as this is a Green field site, if you cannot meet the requirements for affordable dwellings then this would need to be further justified for the site.

6. We see you remain concerned about inclusivity but there are no comments about the points we discussed at the meeting. Will we get this in the final formal response? Please explain what you mean by “limited physical connectivity” to the wider community – the houses are well linked via pavements to Rendlesham. In terms of your other points please note that the applicants have had a meeting with Clarke and Simpson and are proposing to use them for sales and marketing – of course this is a chicken and egg situation because the marketing can’t happen until there’s something to market. C&S will provide an internet presence on property portals such as Rightmove and On The Market, take enquiries, and then hand over to the in-house sales team. You will know they already work in this way with other property developers such as Hopkins Homes. It would be useful to hear from you that knowing this sort of info helps to allay your concerns about how the site will be marketed ‘post-consent’. But on a wider point of social connectivity, and this goes back to the discussions in the meeting, the peace palace and the health centre are open to *all* members of the public, whether or not they have any interest in meditation. The peace palace is promoting itself to public visitors for Bed and Breakfast stays, and to businesses and other organisations as a conference venue, and the health centre is actively offering consultations and treatments to the general public. <https://peacepalace.org.uk/bb> <https://peacepalace.org.uk/business> <https://ayurveda-rendlesham.co.uk/our-health-centre/>. As the applicants said at the meeting, the existing residents on Garden Square and Gardenia Close are active members of many ‘groups’ in and around Rendlesham and come from a wide variety of backgrounds.

That use is not for dwelling it is an education centre, I don't know how this would be applicable to the dwellings on this site? Also is the ownership different? as the developer is not the same as this application?

Second part – this will be looked at and come back to you

- The provision of Affordable Housing with additional feedback from your Housing dept.

- *Design – whether the development will create a safe and socially interactive environment.*
- *Design – overlooking, overshadowing, a dominating effect.*
- *Initial advice on planning contributions.*

Please see attached layout plans, mix info, streetscenes, parking info and a copy of the neighbourhood watch response re the absence of crime locally.

You will appreciate that we maintain that these are matters of detailed design that could and should have been discussed during the process of the previous planning application but that is not a debate for now. Below is our response to the previous officer's report pages 18 to 20 in terms of design and security etc.

Continuity of design from Tidy Road and Mayhew Road. The overall intention is for the new development to be an extension of the existing development on Garden Square and Gardenia Close, i.e. to create one integrated development of 138 units rather than two differentiated developments of 75 units and 63 units. By and large we have used the existing and previously approved house designs, and we have extended the grid layout on Garden Square and Gardenia Close. Grid layouts are not uncommon in Rendlesham as you know from the Redwald Estate. The layout of Tidy Road and Mayhew Road is rather random and chaotic. The RNP is complimentary about the design and layout of GS and GC, but is critical of that of Mayhew Road and Tidy Road.

Small amenity space to rear. It is true that the traditional English approach is to have a small public garden to the front and a larger private garden to the rear. This is typical of suburban developments where houses tend to be much closer together, often in a row of semi-detached or a terrace. This is less of an issue in this development but also in other parts of Rendlesham where the former American housing is.

Front of plots dominated by car parking and hard standing. In the site layout for the earlier planning application we allowed for 186 parking spaces to meet SCC guidance. We thought this was excessive but it was to meet guidance. On 15 January we met with Ben Chester at CHA and we now understand that we can manage with 165 spaces. Please find attached the site master plan showing parking. This substantially reduces the amount of car parking and hard standing. We can also soften the impact of hard standing by planting shrubs and hedges in between groups of spaces, and by using eco-grids or grasscrete for some of the spaces.

No variation in heights, all two and three storey buildings. In the revised drawings there is more of a variation. We have introduced a bungalow at 4.8m. The actual heights vary from 4.8m to 11.1m.

High fences or brick walls to rear of properties. The report raises a concern that on the west side of the vertical north-south roads there will be a long line of fences and brick walls. This was not a problem on Garden Square or Gardenia Close so we thought SCDC would accept the precedent. We can soften this by staggering the boundaries, by having different heights for fences or walls, and especially by planting and landscaping. Please find attached a street scene which illustrates how this can be done.

Outdoor space associated with Peace Palace. In Revision MM we have moved this area to the west of the site, and instead of referring to it as *Outdoor space associated with the existing peace palace educational facility* we now refer to it as *Reserved for future educational/community building*. It is not uncommon for areas to be reserved in large sites for future developments, to be decided on their own merits at the appropriate time.

Play area too far away from the properties, less accessible on foot or bicycle, too close to the STW. In Revision MM we have brought this play area closer to the dwellings and away from the STW.

Visitor parking too far away from the dwellings. In Revision W we had 34 parking spaces in the north-east, of which 18 were for the properties, 12 for visitors, and 4 for PTW (powered two-wheelers). In Revision MM we have reduced this to 12 spaces for visitors and 4 for PTW.

Green space in *cordon sanitaire* left unmanaged and used as scrubland. The green space and gardens on Garden Square and Gardenia Close are well maintained by an estate management company. Residents pay an estate rent charge to this company. We propose to use the same structure for the new development and are confident it will not be left unmanaged or used as scrubland. Residents will have a strong interest in maintaining it well.

Too many vertical north-south access roads. In Revision MM we have 7 instead of 9 as in the earlier Revision W.

Suffolk Constabulary concerns regarding safety, e.g. surveillance to deter crime, and permeability of the development. Overall it must be said that the grid layout provides good lines of sight. Garden Square and Gardenia Close are part of a Neighbourhood Watch Scheme and the co-ordinator has confirmed that the actual experience over a number of years is that there has been virtually nil incidence of crime, copy attached. The Suffolk Constabulary concerns are perhaps hypothetical, and are not supported by the actual evidence. Also some of the changes in Revision MM have reduced the 'permeability' of the site, for example we have omitted the trim trail around the back or sides of properties. We have labelled the trim trail as an ecological wildlife corridor. We have now reduced or removed the trim trail, and instead refer to it as an ecological wildlife corridor. There will be a perimeter fence along the western and northern boundaries. We have removed the pond area.

Overlooking, overshadowing, dominating effect.

Overlooking Plot 20. In Revision MM we have removed the tall building with a balcony on Plot 20.

Overlooking generally. Please find a site masterplan with the separation distances for the new development and for the existing development on Garden Square and Gardenia Close. The distances are better compared to Garden Square and Gardenia Close, and also better compared to Tidy Road and Mayhew Road.

Overlooking Plot 15. We have three maisonette blocks around the peace palace, and symmetry encourages us to build a 4th block to complete the pattern of around the peace palace. The separation distance is the same between Plot 15 and 5-6 Peace Palace Gardens as it is between 1-2 PPG and 3-4 PPG. There are trees between Plot 15 and 5-6 PPG which will provide privacy.

Overlooking between flank elevations (north-south). Generally the house designs tend to have very few windows on the north elevations. Also the separation distances between flank elevations on the new development are better compared to the existing and previously acceptable GS and GC and to Tidy Road and Mayhew Road, see plan attached.

Overshadowing between flank elevations. We have staggered some of the buildings to respond to this point.

Trim trail - noise and overlooking. In Revision MM we have removed sections of the trim trail and maintained the eastern stretch which also becomes the bridleway.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



Norfolk Office:

Parker Planning Services Ltd, Orchard House, Hall Lane, East Tuddenham, NR20 3LR
Phone: 01603 516319

Suffolk Office:

Parker Planning Services Ltd, Northgate Business Centre, 10 Northgate Street, Bury St Edmunds, Suffolk, IP33 1HQ
Phone: 01284 336348

Essex Office:

Parker Planning Services Ltd, Moulsham Mill, Parkway, Chelmsford, Essex, CM2 7PX
Phone: 01245 934184

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From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>

Sent: 22 January 2019 16:23

To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

Here is the councils response to the first stage of the pre-application.

A meeting was held with the applicant and agent for this pre-application to discuss the way forward and the previous planning permission decision.

It was agreed that advice would be given to the applicant on the following points before a final report is given on the final points of the pre-application.

- Provide feedback on the principle of development and the quantum of housing
- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

The quantum of development the principle of development

This proposal site is allocated in the Site allocation document SSP12 therefore the principle of development is considered to be established. However, the policy refers to approximately 50 dwellings on the site whereas this application refers to 75 dwellings.

As discussed within the meeting this level of development on the site may be acceptable where other material planning considerations are taken into account and would not impact on the future and current occupants in and around the site.

There are to be further plans submitted as part of this pre-application to be able to consider the design of the site and other material planning considerations.

Inclusive and sustainable community

There is still a concern on the inclusivity of the site, this will depend on the additional information that is still to be submitted to the Planning Authority. Based upon the information available, the scheme appears to have limited physical or social connectivity to the existing wider local community across the settlement of Rendlesham, and the dwellings

within the scheme would not be truly open market dwellings because their sale would be limited to a particular group of individuals.

Therefore based upon the information provided on the previous application and within the current submission, the proposal would be not be socially inclusive, and lack connectivity to the existing wider community, and thus not represent sustainable development as defined in local planning policy SP1 and the NPPF, because it would not "create and promote inclusive and sustainable communities".

I have received a number of phone calls, which suggest that potential residents of the site are being asked to pay money for the proposed homes, even though there is no planning permission for the proposed development. Whilst such a process lies outside the planning application process, it is of concern, and also suggests that the proposed dwellings are being marketed solely to those which have a connection/form part of the applicants group.

It has also been suggested that existing dwellings on the existing adjacent development have restrictions on them and can be sold too only those who form part of the group, and therefore in effect can not be sold to anyone who may be able to afford them. This suggests they are not truly open market.

This site is allocated in the Site Allocations document for open market housing with one-third affordable dwellings. Therefore in order to comply with the policy these requirements will need to be met.

Mix of different bedroom properties

Policy SP3 of the Core Strategy refers to the amount of house sizes in regards of bedrooms.

Bedrooms	1	2	3	4+
Open Market Housing	(6%) 4.5	(32%) 24	(39%) 29.25	(22%) 16.5
Affordable Housing	(43%) 32.25	(31%) 23.25	(16%) 12	(11%) 8.25
All sectors	(13%) 9.75	(32%) 24	(35%) 26.25	(20%) 15

This would be the required level of development on the site for 75 dwellings.

The adopted local plan policy (DM2) requires 33% of housing to be provided on this site to be affordable housing units comprising of 75% affordable rented and 25% low cost home ownership (normally shared ownership or shared equity). Current working practice is to ask for a 70% / 30% split. The affordable houses would need to be provided to a registered social landlord.

The draft local plan policy which is currently at the prior to submission stage, requires 33% affordable housing comprising of 50% affordable rented, 25% shared ownership and 25% discounted home ownership to reflect the findings of the published SHMA report.

This is a greenfield site and there are no other adverse planning constraints. Therefore it is expected the full policy requirement for affordable housing is provided on the site (i.e. one-third of the units need to be affordable to be transferred to a Registered Social Landlord). If you are proposing a scheme with less affordable dwellings than that required by planning policy, a viability report would need to be submitted to demonstrate, why the policy requirements cannot be fulfilled, and the level of affordable housing that can be located on the site.

Recreational Avoidance Mitigation Strategy

This is currently implemented by the Local Planning Authority, any development within 13km of the European Protected sites are to provided mitigation on the site or a payment towards mitigation off of the site.

The following link provides information on the councils process and methods of payment:

<http://www.eastsuffolk.gov.uk/planning/s106/habitat-mitigation/>

Community Infrastructure Levy (CIL)

As this proposal is for residential development, it would also be CIL Liable. Rendlesham is in the Medium Charging Zone. Further details on rates etc can be found online via <http://www.eastsuffolk.gov.uk/planning/community-infrastructure-levy/>

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505
Mobile: 07919303788

On 1 April 2019, we will become East Suffolk Council – a new 'super district' authority, serving the residents, businesses and communities of both Suffolk Coastal and Waveney. Importantly, it will be business as usual and the high quality services you receive from us will not be affected.

www.eastsuffolk.gov.uk



From: steven@parkerplanningservices.co.uk [<mailto:steven@parkerplanningservices.co.uk>]
Sent: 22 January 2019 08:02
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello again Jane,

We have the drawings and information ready for the 2nd half of the pre-app advice on detailed design matters. Do you have an eta for the first half covering the principal issues?

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



Norfolk Office:
Parker Planning Services Ltd, Orchard House, Hall Lane, East Tuddenham, NR20 3LR
Phone: 01603 516319

Suffolk Office:
Parker Planning Services Ltd, Northgate Business Centre, 10 Northgate Street, Bury St Edmunds, Suffolk, IP33 1HQ
Phone: 01284 336348

Essex Office:

Parker Planning Services Ltd, Moulsham Mill, Parkway, Chelmsford, Essex, CM2 7PX
Phone: 01245 934184

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From: Jane Rodens <Jane.Rodens@eastsoffolk.gov.uk>

Sent: 15 January 2019 14:03

To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

I am working on the information below, I am sorry for the delay in getting it to you, but I send out has to be cleared by a line manager as well.

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505
Mobile: 07919303788

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From: steven@parkerplanningservices.co.uk [<mailto:steven@parkerplanningservices.co.uk>]

Sent: 15 January 2019 13:51

To: Jane Rodens

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Good afternoon Jane,

Just a quick reminder on the email below.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



Norfolk Office:

Parker Planning Services Ltd, Orchard House, Hall Lane, East Tuddenham, NR20 3LR
Phone: 01603 516319

Suffolk Office:

Parker Planning Services Ltd, Northgate Business Centre, 10 Northgate Street, Bury St Edmunds, Suffolk, IP33 1HQ
Phone: 01284 336348

Essex Office:

Parker Planning Services Ltd, Moulsham Mill, Parkway, Chelmsford, Essex, CM2 7PX
Phone: 01245 934184

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From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>

Sent: 10 January 2019 16:30

To: 'Jane Rodens' <Jane.Rodens@eastssuffolk.gov.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Importance: High

Good afternoon Jane,

Further to our correspondence below please can we pick this up again with a similar staged approach as requested before? i.e.:

Part 1 (asap)

- With reference to our pre-app letter, meeting notes and with senior officer oversight as necessary, provide feedback on the principle of development and the quantum of housing
- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

Part 2 (for the design elements we will very soon provide an amended revised draft to you)

- The provision of Affordable Housing with additional feedback from your Housing dept.
- Design – whether the development will create a safe and socially interactive environment.
- Design – overlooking, overshadowing, a dominating effect.
- Initial advice on planning contributions.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>

Sent: 19 December 2018 11:31

To: 'Jane Rodens' <Jane.Rodens@eastssuffolk.gov.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello Jane,

Thanks for your email. The deadline for the pre-app response is this Sunday and assuming you're not in the office on Sunday do you want or need to extend it?

Clearly our preference is always to get pre-app advice within the 28 day period. However in this case we would prefer to receive bespoke advice even if that means it coming in after the deadline because we need to advise our clients in terms of returning to the previous refusal or other options going forwards.

In order for them to use the Christmas period for putting their thinking caps on a response before Friday on the principle/numbers and RAMS points as a minimum would be appreciated.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk

Parker Planning Services Ltd will be closed for the Christmas Holidays from 5pm on 21st December 2018 until 9am on 2nd January 2019.

On behalf of Parker Planning Services Ltd, We would like to take this opportunity to say thank you and to wish you the very best for the New Year. May your Christmas go as planned!



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From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>

Sent: 19 December 2018 11:20

To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

Sorry, for the delay in getting back to you and not being available yesterday.

Thank you for the meeting notes, I will add them to my own.

I have asked affordable housing the question about the additional information as detailed below and the meeting notes.

As detailed below, you have asked for information to be provided before and after the Christmas break. I cannot guarantee that I can provide the information before Christmas as tomorrow is planning committee, I have items to take.

I will try and provide the information that you have requested after Christmas, but I will let you know if I require any further information.

Regards

Jane Rodens BA (Hons) MA MRTPI

Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505
Mobile: 07919303788

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From: steven@parkerplanningservices.co.uk [<mailto:steven@parkerplanningservices.co.uk>]
Sent: 18 December 2018 14:40
To: Jane Rodens
Subject: FW: Rendlesham pre app DC/PREAPP/18/4778
Importance: High

Good afternoon Jane,

Further to our recent pre-app meeting, email of 13th Dec and attempts to telephone you yesterday and today, we are mindful of the limited time before the pre-app deadline can we suggest dividing the pre-app advice on the following basis; the first part to be provided by the end of this week and the second part asap after the Christmas break and by way of an extension of time and additional design meeting if required.

Part 1 before 5pm Friday 21st Dec

- With reference to our pre-app letter, meeting notes and with senior officer oversight as necessary, provide feedback on the principle of development and the quantum of housing
- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

Part 2 after Christmas

- The provision of Affordable Housing with additional feedback from your Housing dept.
- Design – whether the development will create a safe and socially interactive environment.
- Design – overlooking, overshadowing, a dominating effect.
- Initial advice on planning contributions.

Regards,

Appendix 1f

Subject: FW: Rendlesham pre app DC/PREAPP/18/4778
Attachments: jrodens_26-02-2019_15-45-03.pdf

Part 2
pre-app

From: Jane Rodens <Jane.Rodens@eastssuffolk.gov.uk>
Sent: 26 February 2019 15:46
To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

I have been looking at the design of the application as part 2 of the pre-application, I have the following comments to make, I have attached a scanned version of your plan to make it easier to refer to.

Access through the site

The amount of roads have been reduced from the previous application, to the east of the site but there are still a large amount of roads to the west of the site. Why can roads 1, 2, 3, 4, 5 and 6 not be removed from the site? This will then half the amount of hard standing that is being developed.

Can there not be connections made at the areas circled on the map attached? This will then improve the accessibility around the site.

The main road through the site is better, this makes a feature of it

Community space

What is this going to be used for? who is going to own this? It says educational, is this going to be a school for the rest of Rendlesham to use? Depending on the proposed use are two houses this close going to be impacted upon?

In the new local plan that is going through the consultation process (depending when a new application is going to be submitted) there is a requirement for a public house or other development of that nature.

Because this would be a development at the end of the main road through the site and highly visible it would be appropriate for it to be developed at an early stage so it is not left as blank land, or depending onto the potential development of the site this would be more appropriate as a garden. But detail would need to be provided at an early stage, to ensure that this can be conditioned or developed in a phase of the overall site.

Site Layout

Thank you for the separation distances, but this does not make it clear if there would still be direct looking between windows the houses appear to be staggered slightly but this could appear messy once developed if they are not lined up. Further detail would be required on the design of the dwellings and their relationship between each other.

Bungalows have been provided, where?

Are these still three and two storey height dwellings? Any semi-detached properties Terraced properties? to mix up the site

Why is the visitor parking still located near the park area? Can the parking for the properties be relocated to the side of the dwellings so they do not dominate the front of the properties?

Hedges and fences to the rear of the properties, it has been stated that these will be staggered and different heights. But there would still be a whole street of just hedges and fences. This would occur 13 times through the development. Once or twice, where there is an awkward site within the application site, but this is square and spacious enough not for there to be a problem where this needs to occur. This would be rectified by having back to back dwellings and them not facing the same direction. This would also open up some space for the gardens and the sites would not be restricted for the size of the dwellings.

From: steven@parkerplanningservices.co.uk [<mailto:steven@parkerplanningservices.co.uk>]
Sent: 15 February 2019 18:51
To: Jane Rodens
Cc: 'Jason Parker'
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Good afternoon Jane,

We are disappointed not to have yet received the pre-application advice which we felt sure would have been with us by now following our meeting on Monday and earlier assurances.

Please can you give us a concrete date so that we can properly advise our clients on their options.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 07 February 2019 10:15
To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

The last bit of the pre-application is currently with my team leader for her to look at before I can send it over, I hope to have it by then.

Jane

From: steven@parkerplanningservices.co.uk [<mailto:steven@parkerplanningservices.co.uk>]
Sent: 07 February 2019 10:14
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Good morning Jane,

We are meeting on Monday. Will you be able to complete the pre-app for Rendlesham by then?

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>
Sent: 31 January 2019 21:21
To: 'Jane Rodens' <Jane.Rodens@eastsuffolk.gov.uk>
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Good evening Jane,

Do you have an eta for the pre-app response on the 2nd part please?

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>

Sent: 29 January 2019 14:11

To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>

Cc: planning <planning@eastsuffolk.gov.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

Thank you for your email, I will put in the information below.

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505

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From: steven@parkerplanningservices.co.uk [mailto:steven@parkerplanningservices.co.uk]

Sent: 25 January 2019 18:00

To: Jane Rodens

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Good afternoon Jane,

Thank you for sending the first part pre-app advice over. We would like to clarify a few points from the first part advice and then below this you will see some discussion and further information on the second part. It would be easier for us to follow if your answers are inserted underneath the questions. We would be happy to discuss any of this on the telephone if anything is unclear.

First part

- *With reference to our pre-app letter, meeting notes and with senior officer oversight as necessary, provide feedback on the principle of development and the quantum of housing*
 - *Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community*
 - *Provide further information on the Recreational Avoidance Mitigation Strategy.*
 - *Provide feedback on the mix of different bedroom properties.*
1. In respect of your advice on the quantum of development please confirm (yes/no) the following adaptation of your sentence: "As discussed within the meeting this level of development on the site may be acceptable where other material planning considerations are taken into to account **in the planning balance** and would not impact on the future and current occupants in and around the site." This is important because at the meeting it was agreed that the tilted balance applies because SP2 is out of date. It would also be useful if you could set out some of the material considerations such as the 'additional' housing being windfall and/or an efficient use of land in a sustainable location etc. Also if it helps we discussed the following (which relates to the attached developable area plan) at the meeting and were expecting a specific response to it: The site is physically capable of accommodating up to 100 units, let alone 50 or 75. Please find attached a site plan showing the nett developable area. The gross area is 51,020 m². The landscape buffer, the easements over the sewers, and the exclusion zone account for 18,664 m². If we deduct this, this leave a nett developable area of 32,356 m². If we use a reasonable density of 30 dwellings per hectare, this could accommodate up to 100 dwellings. The numbers were reduced from 75 units to 50 units because of the landscape buffer, the easements and the exclusion zone. Based on the evidence this is not justified and we are making comments to the local plan consultation to this effect. But please can you tell us whether there were any specific reasons why 75 units would not be an efficient use of land; land that has space for 100 units?

The planning balance refers to the material planning considerations, if 75 dwellings cannot fit in because there is overlooking or amenity issues, or the design of the layout is unacceptable, then the amount of dwellings would need to be reduced to overcome these problems. More dwellings may be acceptable if it can be proven that there is no adverse effect on the future and current residents of the site.

As you state above there is still a requirement for the provision of the sewerage network, treatment plant, landscape buffer, which are all requirements of the policy, this then reduces the amount of dwellings further. This may have been a representation at the Local Plan and the new local plan but this is the policy as it currently stands, if the policy changes in the new local plan then this would be a different matter. However, at this stage the New Local Plan policy for the site SCLP12.62 is the same as the current policy. Therefore still keeping the amount of dwellings at approximately 50 dwellings, subject to the above.

2. Please give us some feedback on the point made at the meeting that the 'limiting factors' for Rendlesham referred to in the Site Allocations and Area Specific Policies DPD were either not limiting factors in the first place or have been shown not to be limiting factors through subsequent assessment.

I am assuming that the limiting factors are the need for sewerage network, treatment plant, landscape buffer. These has come about through the development of the policy and are criteria in the policy and therefore should be applied to the application.

3. Please confirm we are correct in our understanding (yes/no) that Table 3.6 (mix) of the Core Strategy includes target figures, is referred to as a "general rule" and is not in policy SP3 but rather is supporting text to it. Please note in Revision MM we are closer still to the desired target mix in the local plan and would appreciate your thoughts on this.

These are target figures and developments will be looked upon favourably where they meet and are closest to it.

4. The link you provided for RAMS information says repeatedly that the scheme "will be" required. But when? At the meeting Nick Sibbett said he had not seen that the scheme had actually been formally implemented yet. You said you would provide evidence that it had been implemented (an action point on the attached meeting note). It appears that RAMS is still not formally in place yet. Please confirm that you agree (yes/no) with your Babergh colleague's statement on RAMS (below) and that therefore RAMS was not in place in 2018, is not in place yet, but probably will be by the time we submit:

From: Clare Dawson <Clare.Dawson@baberghmidsuffolk.gov.uk>

Sent: 10 January 2019 07:14

To: Nick Sibbett <nick.sibbett@tlf.uk.com>

Subject: RE: Latest position with RAMS for European sites

Hi Nick

The Suffolk Coast and Estuary RAMS has been through a final proof read and we are awaiting the final strategy as we speak.

Once we (all five Local Authorities) are in agreement that the Strategy is complete we will then be able to go through the process to get it endorsed.

Information regarding the RAMS will be up online as soon as I know the Strategy is ready – hopefully in the next month or two

If you have any further questions please do not hesitate to ask

Kind regards

Clare

Clare Dawson

Strategic Planning Policy Officer

I cannot comment on the above email, but I have been informed, and have been applying RAMS to all applications that refer to development of new dwellings and holiday lets, by the Team Leaders and the Head of Planning that are to apply this to all applications.

5. You said you would get comments from the Housing Officer (an action point in the attached meeting note) – are these yet to be received? In his consultation response of 20 August 2018 Peter Goodrick, the Housing Development Manager, called for the Council to carry out its own viability report to check "concerns" about land values, build costs and open market values "*In my opinion a 2nd viability report should be undertaken on this site for the Council*". In the absence of such a report or further feedback from him it is difficult for us to understand what was actually wrong with the previous viability report.

I did and they are put into the pre-application sent to you, it is recommended that a new viability report is submitted, there are questions raised over the figures and the costs of the site as this is a Green field site, if you cannot meet the requirements for affordable dwellings then this would need to be further justified for the site.

6. We see you remain concerned about inclusivity but there are no comments about the points we discussed at the meeting. Will we get this in the final formal response? Please explain what you mean by “limited physical connectivity” to the wider community – the houses are well linked via pavements to Rendlesham. In terms of your other points please note that the applicants have had a meeting with Clarke and Simpson and are proposing to use them for sales and marketing – of course this is a chicken and egg situation because the marketing can’t happen until there’s something to market. C&S will provide an internet presence on property portals such as Rightmove and On The Market, take enquiries, and then hand over to the in-house sales team. You will know they already work in this way with other property developers such as Hopkins Homes. It would be useful to hear from you that knowing this sort of info helps to allay your concerns about how the site will be marketed ‘post-consent’. But on a wider point of social connectivity, and this goes back to the discussions in the meeting, the peace palace and the health centre are open to *all* members of the public, whether or not they have any interest in meditation. The peace palace is promoting itself to public visitors for Bed and Breakfast stays, and to businesses and other organisations as a conference venue, and the health centre is actively offering consultations and treatments to the general public. <https://peacepalace.org.uk/bb> <https://peacepalace.org.uk/business> <https://ayurveda-rendlesham.co.uk/our-health-centre/>. As the applicants said at the meeting, the existing residents on Garden Square and Gardenia Close are active members of many ‘groups’ in and around Rendlesham and come from a wide variety of backgrounds.

That use is not for dwelling it is an education centre, I don't know how this would be applicable to the dwellings on this site? Also is the ownership different? as the developer is not the same as this application?

Second part – this will be looked at and come back to you

- *The provision of Affordable Housing with additional feedback from your Housing dept.*
- *Design – whether the development will create a safe and socially interactive environment.*
- *Design – overlooking, overshadowing, a dominating effect.*
- *Initial advice on planning contributions.*

Please see attached layout plans, mix info, streetscenes, parking info and a copy of the neighbourhood watch response re the absence of crime locally.

You will appreciate that we maintain that these are matters of detailed design that could and should have been discussed during the process of the previous planning application but that is not a debate for now. Below is our response to the previous officer’s report pages 18 to 20 in terms of design and security etc.

Continuity of design from Tidy Road and Mayhew Road. The overall intention is for the new development to be an extension of the existing development on Garden Square and Gardenia Close, i.e. to create one integrated development of 138 units rather than two differentiated developments of 75 units and 63 units. By and large we have used the existing and previously approved house designs, and we have extended the grid layout on Garden Square and Gardenia Close. Grid layouts are not uncommon in Rendlesham as you know from the Redwald Estate. The layout of Tidy Road and Mayhew Road is rather random and chaotic. The RNP is complimentary about the design and layout of GS and GC, but is critical of that of Mayhew Road and Tidy Road.

Small amenity space to rear. It is true that the traditional English approach is to have a small public garden to the front and a larger private garden to the rear. This is typical of suburban developments where houses tend to be much closer together, often in a row of semi-detached or a terrace. This is less of an issue in this development but also in other parts of Rendlesham where the former American housing is.

Front of plots dominated by car parking and hard standing. In the site layout for the earlier planning application we allowed for 186 parking spaces to meet SCC guidance. We thought this was excessive but it was to meet guidance. On 15 January we met with Ben Chester at CHA and we now understand that we can manage with 165 spaces. Please find attached the site master plan showing parking. This substantially reduces the amount of car parking and hard standing.

We can also soften the impact of hard standing by planting shrubs and hedges in between groups of spaces, and by using eco-grids or grasscrete for some of the spaces.

No variation in heights, all two and three storey buildings. In the revised drawings there is more of a variation. We have introduced a bungalow at 4.8m. The actual heights vary from 4.8m to 11.1m.

High fences or brick walls to rear of properties. The report raises a concern that on the west side of the vertical north-south roads there will be a long line of fences and brick walls. This was not a problem on Garden Square or Gardenia Close so we thought SCDC would accept the precedent. We can soften this by staggering the boundaries, by having different heights for fences or walls, and especially by planting and landscaping. Please find attached a street scene which illustrates how this can be done.

Outdoor space associated with Peace Palace. In Revision MM we have moved this area to the west of the site, and instead of referring to it as *Outdoor space associated with the existing peace palace educational facility* we now refer to it as *Reserved for future educational/community building*. It is not uncommon for areas to be reserved in large sites for future developments, to be decided on their own merits at the appropriate time.

Play area too far away from the properties, less accessible on foot or bicycle, too close to the STW. In Revision MM we have brought this play area closer to the dwellings and away from the STW.

Visitor parking too far away from the dwellings. In Revision W we had 34 parking spaces in the north-east, of which 18 were for the properties, 12 for visitors, and 4 for PTW (powered two-wheelers). In Revision MM we have reduced this to 12 spaces for visitors and 4 for PTW.

Green space in *cordon sanitaire* left unmanaged and used as scrubland. The green space and gardens on Garden Square and Gardenia Close are well maintained by an estate management company. Residents pay an estate rent charge to this company. We propose to use the same structure for the new development and are confident it will not be left unmanaged or used as scrubland. Residents will have a strong interest in maintaining it well.

Too many vertical north-south access roads. In Revision MM we have 7 instead of 9 as in the earlier Revision W.

Suffolk Constabulary concerns regarding safety, e.g. surveillance to deter crime, and permeability of the development. Overall it must be said that the grid layout provides good lines of sight. Garden Square and Gardenia Close are part of a Neighbourhood Watch Scheme and the co-ordinator has confirmed that the actual experience over a number of years is that there has been virtually nil incidence of crime, copy attached. The Suffolk Constabulary concerns are perhaps hypothetical, and are not supported by the actual evidence. Also some of the changes in Revision MM have reduced the 'permeability' of the site, for example we have omitted the trim trail around the back or sides of properties. We have labelled the trim trail as an ecological wildlife corridor. We have now reduced or removed the trim trail, and instead refer to it as an ecological wildlife corridor. There will be a perimeter fence along the western and northern boundaries. We have removed the pond area.

Overlooking, overshadowing, dominating effect.

Overlooking Plot 20. In Revision MM we have removed the tall building with a balcony on Plot 20.

Overlooking generally. Please find a site masterplan with the separation distances for the new development and for the existing development on Garden Square and Gardenia Close. The distances are better compared to Garden Square and Gardenia Close, and also better compared to Tidy Road and Mayhew Road.

Overlooking Plot 15. We have three maisonette blocks around the peace palace, and symmetry encourages us to build a 4th block to complete the pattern of around the peace palace. The separation distance is the same between Plot 15

and 5-6 Peace Palace Gardens as it is between 1-2 PPG and 3-4 PPG. There are trees between Plot 15 and 5-6 PPG which will provide privacy.

Overlooking between flank elevations (north-south). Generally the house designs tend to have very few windows on the north elevations. Also the separation distances between flank elevations on the new development are better compared to the existing and previously acceptable GS and GC and to Tidy Road and Mayhew Road, see plan attached.

Overshadowing between flank elevations. We have staggered some of the buildings to respond to this point.

Trim trail - noise and overlooking. In Revision MM we have removed sections of the trim trail and maintained the eastern stretch which also becomes the bridleway.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



Norfolk Office:

Parker Planning Services Ltd, Orchard House, Hall Lane, East Tuddenham, NR20 3LR
Phone: 01603 516319

Suffolk Office:

Parker Planning Services Ltd, Northgate Business Centre, 10 Northgate Street, Bury St Edmunds, Suffolk, IP33 1HQ
Phone: 01284 336348

Essex Office:

Parker Planning Services Ltd, Moulsham Mill, Parkway, Chelmsford, Essex, CM2 7PX
Phone: 01245 934184

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From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>

Sent: 22 January 2019 16:23

To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

Here is the councils response to the first stage of the pre-application.

A meeting was held with the applicant and agent for this pre-application to discuss the way forward and the previous planning permission decision.

It was agreed that advice would be given to the applicant on the following points before a final report is given on the final points of the pre-application.

- Provide feedback on the principle of development and the quantum of housing
- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

The quantum of development the principle of development

This proposal site is allocated in the Site allocation document SSP12 therefore the principle of development is considered to be established. However, the policy refers to approximately 50 dwellings on the site whereas this application refers to 75 dwellings.

As discussed within the meeting this level of development on the site may be acceptable where other material planning considerations are taken into account and would not impact on the future and current occupants in and around the site.

There are to be further plans submitted as part of this pre-application to be able to consider the design of the site and other material planning considerations.

Inclusive and sustainable community

There is still a concern on the inclusivity of the site, this will depend on the additional information that is still to be submitted to the Planning Authority. Based upon the information available, the scheme appears to have limited physical or social connectivity to the existing wider local community across the settlement of Rendlesham, and the dwellings within the scheme would not be truly open market dwellings because their sale would be limited to a particular group of individuals.

Therefore based upon the information provided on the previous application and within the current submission, the proposal would not be socially inclusive, and lack connectivity to the existing wider community, and thus not represent sustainable development as defined in local planning policy SP1 and the NPPF, because it would not "create and promote inclusive and sustainable communities".

I have received a number of phone calls, which suggest that potential residents of the site are being asked to pay money for the proposed homes, even though there is no planning permission for the proposed development. Whilst such a process lies outside the planning application process, it is of concern, and also suggests that the proposed dwellings are being marketed solely to those which have a connection/form part of the applicants group.

It has also been suggested that existing dwellings on the existing adjacent development have restrictions on them and can be sold too only those who form part of the group, and therefore in effect can not be sold to anyone who may be able to afford them. This suggests they are not truly open market.

This site is allocated in the Site Allocations document for open market housing with one-third affordable dwellings. Therefore in order to comply with the policy these requirements will need to be met.

Mix of different bedroom properties

Policy SP3 of the Core Strategy refers to the amount of house sizes in regards of bedrooms.

Bedrooms	1	2	3	4+
Open Market Housing	(6%) 4.5	(32%) 24	(39%) 29.25	(22%) 16.5
Affordable Housing	(43%) 32.25	(31%) 23.25	(16%) 12	(11%) 8.25
All sectors	(13%) 9.75	(32%) 24	(35%) 26.25	(20%) 15

This would be the required level of development on the site for 75 dwellings.

The adopted local plan policy (DM2) requires 33% of housing to be provided on this site to be affordable housing units comprising of 75% affordable rented and 25% low cost home ownership (normally shared ownership or shared equity). Current working practice is to ask for a 70% / 30% split. The affordable houses would need to be provided to a registered social landlord.

The draft local plan policy which is currently at the prior to submission stage, requires 33% affordable housing comprising of 50% affordable rented, 25% shared ownership and 25% discounted home ownership to reflect the findings of the published SHMA report.

This is a greenfield site and there are no other adverse planning constraints. Therefore it is expected the full policy requirement for affordable housing is provided on the site (i.e. one-third of the units need to be affordable to be transferred to a Registered Social Landlord). If you are proposing a scheme with less affordable dwellings than that required by planning policy, a viability report would need to be submitted to demonstrate, why the policy requirements cannot be fulfilled, and the level of affordable housing that can be located on the site.

Recreational Avoidance Mitigation Strategy

This is currently implemented by the Local Planning Authority, any development within 13km of the European Protected sites are to provide mitigation on the site or a payment towards mitigation off of the site.

The following link provides information on the councils process and methods of payment:

<http://www.eastsuffolk.gov.uk/planning/s106/habitat-mitigation/>

Community Infrastructure Levy (CIL)

As this proposal is for residential development, it would also be CIL Liable. Rendlesham is in the Medium Charging Zone. Further details on rates etc can be found online via <http://www.eastsuffolk.gov.uk/planning/community-infrastructure-levy/>

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505
Mobile: 07919303788

On 1 April 2019, we will become East Suffolk Council— a new 'super district' authority, serving the residents, businesses and communities of both Suffolk Coastal and Waveney. Importantly, it will be business as usual and the high quality services you receive from us will not be affected.

www.eastsuffolk.gov.uk



From: steven@parkerplanningservices.co.uk [<mailto:steven@parkerplanningservices.co.uk>]

Sent: 22 January 2019 08:02

To: Jane Rodens

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello again Jane,

We have the drawings and information ready for the 2nd half of the pre-app advice on detailed design matters. Do you have an eta for the first half covering the principal issues?

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



Norfolk Office:

Parker Planning Services Ltd, Orchard House, Hall Lane, East Tuddenham, NR20 3LR
Phone: 01603 516319

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Phone: 01284 336348

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Phone: 01245 934184

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From: Jane Rodens <Jane.Rodens@eastssuffolk.gov.uk>

Sent: 15 January 2019 14:03

To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

I am working on the information below, I am sorry for the delay in getting it to you, but I send out has to be cleared by a line manager as well.

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505
Mobile: 07919303788

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www.eastsuffolk.gov.uk



From: steven@parkerplanningservices.co.uk [<mailto:steven@parkerplanningservices.co.uk>]

Sent: 15 January 2019 13:51

To: Jane Rodens

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Good afternoon Jane,

Just a quick reminder on the email below.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



Norfolk Office:

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From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>

Sent: 10 January 2019 16:30

To: 'Jane Rodens' <Jane.Rodens@eastsuffolk.gov.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Importance: High

Good afternoon Jane,

Further to our correspondence below please can we pick this up again with a similar staged approach as requested before? I.e.:

Part 1 (asap)

- With reference to our pre-app letter, meeting notes and with senior officer oversight as necessary, provide feedback on the principle of development and the quantum of housing
- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

Part 2 (for the design elements we will very soon provide an amended revised draft to you)

- The provision of Affordable Housing with additional feedback from your Housing dept.
- Design – whether the development will create a safe and socially interactive environment.
- Design – overlooking, overshadowing, a dominating effect.
- Initial advice on planning contributions.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>

Sent: 19 December 2018 11:31

To: 'Jane Rodens' <Jane.Rodens@eastssuffolk.gov.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello Jane,

Thanks for your email. The deadline for the pre-app response is this Sunday and assuming you're not in the office on Sunday do you want or need to extend it?

Clearly our preference is always to get pre-app advice within the 28 day period. However in this case we would prefer to receive bespoke advice even if that means it coming in after the deadline because we need to advise our clients in terms of returning to the previous refusal or other options going forwards.

In order for them to use the Christmas period for putting their thinking caps on a response before Friday on the principle/numbers and RAMS points as a minimum would be appreciated.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



*Parker Planning Services Ltd wish to extend their Christmas Holidays from Sept 24th to Dec 24th
2nd January 2019*

*On behalf of Parker Planning Services Ltd, we would like to take this opportunity to say thank you
for the joy that the Christmas season has brought to all.*



Norfolk Office:

Parker Planning Services Ltd, Orchard House, Hall Lane, East Tuddenham, NR20 3LR
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From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>

Sent: 19 December 2018 11:20

To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

Sorry, for the delay in getting back to you and not being available yesterday.

Thank you for the meeting notes, I will add them to my own.

I have asked affordable housing the question about the additional information as detailed below and the meeting notes.

As detailed below, you have asked for information to be provided before and after the Christmas break. I cannot guarantee that I can provide the information before Christmas as tomorrow is planning committee, I have items to take.

I will try and provide the information that you have requested after Christmas, but I will let you know if I require any further information.

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505
Mobile: 07919303788

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www.eastsuffolk.gov.uk



From: steven@parkerplanningservices.co.uk [<mailto:steven@parkerplanningservices.co.uk>]
Sent: 18 December 2018 14:40
To: Jane Rodens
Subject: FW: Rendlesham pre app DC/PREAPP/18/4778
Importance: High

Good afternoon Jane,

Further to our recent pre-app meeting, email of 13th Dec and attempts to telephone you yesterday and today, we are mindful of the limited time before the pre-app deadline can we suggest dividing the pre-app advice on the following basis; the first part to be provided by the end of this week and the second part asap after the Christmas break and by way of an extension of time and additional design meeting if required.

Part 1 before 5pm Friday 21st Dec

- With reference to our pre-app letter, meeting notes and with senior officer oversight as necessary, provide feedback on the principle of development and the quantum of housing

- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

Part 2 after Christmas

- The provision of Affordable Housing with additional feedback from your Housing dept.
- Design – whether the development will create a safe and socially interactive environment.
- Design – overlooking, overshadowing, a dominating effect.
- Initial advice on planning contributions.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



*Parker Planning Services Ltd will be closed for the Christmas Holidays from 1pm on 21st December
2nd January 2019.*

*On behalf of Parker Planning Services Ltd. We would like to take this opportunity to say thank you
for the year and for the New Year. Make your Christmas go as planned!*



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Click [here](#) to report this email as spam.

Appendix 2

From:
Sent: 29 March 2019 13:26
To:
Subject: CCD/Police report/FAO CLAIR PACK/ FOI Request 000797-19

----- Forwarded message -----

From: Freedom Of Information (Suffolk) <INFORMATION@suffolk.pnn.police.uk>
To:
Sent: Friday, 29 March 2019, 12:44:15 GMT
Subject: RE: FAO CLAIR PACK/ FOI Request 000797-19

Good afternoon,

Yes I can confirm there were only 4 offences during the time frame 2010 – 2018 for the location of Garden Square and Gardenia Close.

With regards to the two offences in 2017, provision of additional information may result in an individual being identified. However I can confirm that the offence listed as 'Violence against the person', actually related to the offence of 'Sending letters etc with intent to cause distress or anxiety, Malicious Communications Act 1988'. The Burglary offence was a Burglary - Residential - Non-Dwelling.

I hope that this assists

Kind regards

Clair

Clair Pack

Freedom of Information Decision Maker (Suffolk)



**SUFFOLK
CONSTABULARY**

Taking pride in keeping Suffolk safe

Freedom of Information Request Reference N°: FOI 000797-19

I write in connection with your request for information received by Suffolk Constabulary on the 25 February 2019 in which you sought access to the following information:

"Please is it possible to request the crime statistics for the following :

- Rendlesham as a whole January 2010 - January 2018*
- Garden Square and Gardenia Close specifically January 2010 - January 2018."*

Response to your Request

The response provided below is correct as of 8 March 2019

Suffolk Constabulary has considered your request for information and the response is below.

A search has been completed of the Constabulary's crime system for all offences recorded in Rendlesham for the time frame January 2010 – January 2018 inclusive.

The table provided below confirms all offences recorded for the location of Rendlesham, for the time frame specified.

Please note that as requested, 2018 information includes January only.

Offence	2010	2011	2012	2013	2014	2015	2016	2017	2018
Arson And Criminal Damage							5	12	
Burglary	2	2	1	1		2	8	10	
Crime Other		1							
Criminal Damage		2	2	5	2	1			
Drug Offences	2	2		1	3	2	1	3	
Miscellaneous Crimes Against Society						2		1	1
Other Theft	2	3	3			1			
Possession Of Weapons							1	2	
Public Disorder			6	2	3				
Public Order Offences							3	11	
Serious Sexual Offences	1	1			1				
Sexual Offences					1	2	6	4	2



**SUFFOLK
CONSTABULARY**

Taking pride in keeping Suffolk safe

Theft						1	6	9	
Vehicle Crime	1				1				
Vehicle Offences							9	4	
Violence Against The Person	7	10	9	4	7	8	22	33	2
Grand Total	15	21	21	13	18	19	61	89	5

With regards specifically to offences that have occurred in Garden Square and Gardenia Close, the table provided below confirms the total number of offences recorded.

Street Name	HOCR Group	2016	2017
Garden Square	Vehicle Offences	2	
	Violence Against The Person		1
Gardenia Close	Burglary		1
Grand Total		2	2

Should you have any further queries concerning this request, please contact Clair Pack, FOI Decision Maker, quoting the reference number shown above.

A full copy of the Freedom of Information Act (2000) can be viewed on the 'Office of Public Sector Information' web-site;

<http://www.opsi.gov.uk/>

Suffolk Constabulary is not responsible for the content, or the reliability, of the website referenced. The Constabulary cannot guarantee that this link will work all of the time, and we have no control over the availability of the linked pages.

From:
Sent: 25 March 2019 19:46
To:
Subject: RENDLESHAM CRIME STATISTICS + OUR AREA
Attachments: FOI 000797-19.pdf

FYI

— Forwarded message —

From: Freedom Of Information (Suffolk) <INFORMATION@suffolk.pnn.police.uk>
To:
Sent: Monday, 25 March 2019, 14:43:53 GMT
Subject: FOI Request 000797-19

25 March 2019

Dear Ms Livesley,

Our Ref: FOI 000797/19

Please find PDF documents attached in response to your request for information from Suffolk Constabulary.

This is to inform you that all information relating to your request has been collated my response is attached. This request is now complete and shall be closed immediately.

Should any further information be requested regarding this topic, a separate request will need to be submitted.

I would like to take this opportunity to thank you for your interest in Suffolk Constabulary.

Yours sincerely,

Clair Pack

Freedom of Information Decision Maker (Suffolk)

Norfolk and Suffolk Constabularies

Police Headquarters

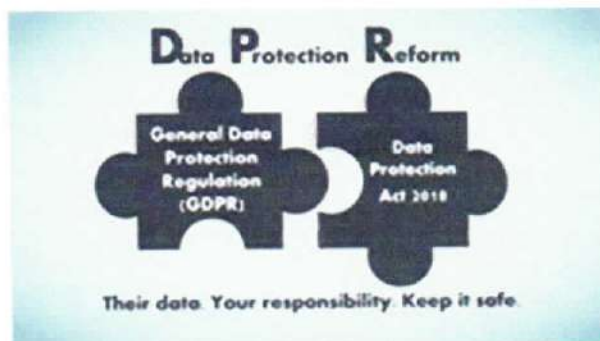
Portal Avenue, Martlesham Heath, Ipswich

Suffolk, IP5 3QS

01473 613888 Ext 3919

www.suffolk.police.uk

www.norfolk.police.uk



Appendix 3



Community Infrastructure Levy Calculator

This calculator allows you to calculate CIL liability for a single use or a mixed use development. Details about the development can be entered into the cream boxes. Once the details of the development have been inserted the total CIL liability is displayed below the table. Please note that this calculator is valid until 31st December 2019.

Existing sqm of in-use buildings to be demolished (E)	
Does the Development involve the creation of a new dwelling?	Yes

Development Type	Zone	Total Sqm	New Build Floorspace (sqm)	Converted Floorspace that qualifies under Kr* (sqm)	Converted Floorspace Sqm that does not qualify under Kr* (sqm)
Residential	Adastral Park	0			
	Low Value	0			
	Medium Value	5797.3	5797.3		
	High Value	0	0		
Convenience Retail	n/a	0			
Comparison Retail	n/a	0			
Other Development	n/a	0			

Indicative CIL Charge: £692,824.87

If your scheme includes social housing you will be eligible for a discount. Click on this button to find out how much:

Calculate Social
Housing Relief

*Kr: see [definition](#) in introduction or in the [regulations](#).

Back to
Introduction

Appendix 4



Representation Form

Make a representation on the Suffolk Coastal Final Draft Local Plan

This representation form relates to the Suffolk Coastal Final Draft Local Plan, which has been published under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012 (as amended).

The representations period runs from **Monday 14 January to 17.00 on Monday 25 February 2019**. Representations received after this date may not be considered. Only representations received within this period have a statutory right to be considered by the Inspector at the Examination.

The representation form can be completed and submitted via:

- The Council's online consultation system at www.eastsuffolk.gov.uk/finaldraftlocalplan (this is the Council's preferred way of receiving representations);
- Or complete a representation form (available to download from the consultation system or by contacting the Planning Policy and Delivery Team suffolkcoastallocalplan@eastsuffolk.gov.uk / 01394 444557), and return via email to suffolkcoastallocalplan@eastsuffolk.gov.uk or by post to Planning Policy & Delivery Team, East Suffolk House, Station Road, Riduna Park, Melton, Woodbridge, IP12 1RT.

Before completing a representation, please read the accompanying 'Guidance when Making a Representation', available at www.eastsuffolk.gov.uk/finaldraftlocalplan

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in Part B for each representation you wish to make.**

By responding to this consultation you are accepting that your name and representation will be available for public inspection and published on line in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

Name of the DPD to which this representation relates:

Suffolk Coastal Final Draft Local Plan

PART A | Your Details

1. Personal details

2. Agent's Details (if applicable)

Title

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

Address

Postcode

Telephone
Number

E-mail Address

PART B | Your Representation

Please complete a separate form for each representation.

3. To which part of the Local Plan does this representation relate?

Paragraph
number

Policy
Number

Policies Map

Appendix

4. Do you consider that this part of the Plan meets the legal and procedural requirements?

(See [guidance note](#) for assistance with this question)

Yes

☐

No

☐

5. Do you consider this part of the Plan has met the tests of soundness?

(See [guidance note](#) for assistance with this question)

Yes

☐

No

☐

6. Do you consider this part of the Plan to be unsound because it is not:

(See [guidance note](#) for assistance with this question)

Positively
prepared

☐

Justified

☐

Effective

☐

Consistent with
national policy

☐

7. Details of Representation:

Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

8. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound:

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

9. If your representation is seeking a change, do you consider it necessary to participate in the public examination?

Please note the Planning Inspector will make the final decision on who will be invited to participate in individual sessions at the public examination, although all members of the public may observe the proceedings.

Yes, I wish to participate
at the oral examination ☐

No, I do not wish to participate
at the oral examination ☐

10. If you wish to participate in the public examination, please outline why you consider it to be necessary:

11. Being kept informed:

Yes, I would like to
be kept informed ☐

You will be notified of Submission of the Local Plan to the Secretary of State for Public Examination; publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and adoption of the Local Plan.

No, I do not wish to be kept informed
of future progress of the plan ☐

12. Date of Representation and signature:

Date	Signature
------	-----------

Data protection

The information you have supplied is being collected in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. By returning this form you consent to Suffolk Coastal District Council holding and using your information in this way.

By responding to this consultation you are accepting that your name and response will be available for public inspection and published on line in accordance with the Act stated above. However, personal/email addresses, and telephone numbers will not be published.

After the end of the representations period, the Council will submit all representations received to the Secretary of State in a secure manner, this will include any personal data you have supplied.

Data will be processed and held in accordance with the Data Protection Act 1998 (and any updates). Data will be retained securely until the Local Plan is superseded or by the end of the plan period (April 2036) whichever is the earlier date.

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<http://www.eastsuffolk.gov.uk/yourcouncil/access-to-information/data-protection-act/>



January 2019

Representations in Respect of Policy SCLP12.62: Land West of Garden Square, Rendlesham

Suffolk Coastal Final Draft Local
Plan Consultation 2019

Norfolk Office 01603 516319

Orchard House
Hall Lane
East Tuddenham,
Norfolk, NR20 3LR

Suffolk Office 01284 336348

The Northgate Business Centre,
10 Northgate Street,
Bury St Edmunds,
Suffolk, IP33 1HQ

Essex Office 01245 934184

Moulsham Mill,
Parkway,
Chelmsford
Essex, CM2 7PX

Information

Date	January 2019
Site Address	Land West of Garden Square, Rendlesham
Development Description	Final Draft Local Plan Representations
Local Planning Authority	Suffolk Coastal District Council
Representee	Capital Community Developments Ltd.

Author: Jason Parker

Director and Head of Planning

Report Revision:1

1 Details of the Representation

- 1.1 These representations are submitted to the Suffolk Coastal District Council Final Draft Local Plan consultation on behalf of Capital Community Developments Ltd. in respect of Land West of Garden Square (a site allocated for housing development in local plans since 1996) and its respective site-specific policy and supporting text.
- 1.2 The site is allocated in the current local plan and identified as site SSP12. The site was included in the first draft local plan and identified there as site SCLP12.57. It is identified in this final draft local plan as site SCLP12.62 and hereafter referred to as 'the site'.
- 1.3 As described in paragraph 12.698 of the Final Draft document this allocation is "carried forward from the Site Allocations and Area Specific Policies Development Plan Document (January 2017)" and has been carried forward relatively unchanged, with some additional pre-ambles and minor policy changes.
- 1.4 Representations have been made by or on behalf of Capital Community Developments Ltd. throughout the local plan process and during the process of the currently adopted local plan, notably in August 2016 (written representation no. 7901), 1 September 2016 (attendance at examination in public), and 14 September 2018 (written representation, reproduced in Enclosure 3). At the first draft local plan stage representations were made supporting the principle of the housing allocation but objecting to the number of homes stated in the policy. We are maintaining that position and continue to support the principle of the housing allocation for the reasons given previously, whilst objecting to the quantum of housing stated in the policy.
- 1.5 The quantum of housing proposed in the draft policy has been depressed unnecessarily; the site has been allocated for 75 dwellings from 1996 to 2014 but the draft plan preamble refers to "limiting factors" which are not relevant and are not supported by evidence.
- 1.6 We are of the opinion that if the so-called 'limiting factors' can be shown not to exist, and the local planning authority have no evidence to the contrary, then the site can and should be re-allocated for 75 dwellings and this would contribute to the soundness of the local plan.
- 1.7 We set out below the reasoning which demonstrates why these 'limiting factors' were either unwarranted in the first place or have since been demonstrated, through formal submissions to the local planning authority, no longer to exist.
- 1.8 The arguments and evidence referenced in these representations is not new and had been advanced at the Site Allocations local plan examinations in autumn 2016 or in formal planning applications and is therefore 'on record' with the local planning authority. It is reproduced here for ease of reference.

The Highways 'Limiting Factor'

- 1.9 During the preparations for the Site Allocations DPD discussions were held with the Council's planning policy officers regarding the emerging policy for Bentwaters which is the former airfield immediately adjacent to the village of Rendlesham. Part of those discussions centred around removing reference to 'highways limiting factors' in the pre-ambles to the draft Bentwaters policy.
- 1.10 This was because a site-wide planning application (the 'Bentwaters Masterplan' C/10/3239 approved in 2014/5) had assessed highways capacity along the A1152 and concluded that there was no capacity issue on the A1152 and therefore no mitigation was required of the Bentwaters planning application by the County Highways Authority (Enclosure 1). The 'limitation' that had crept into the emerging policy was a remnant of perception of earlier public and consultee concerns about the future of the former airbase; both the technical airfield side and the domestic residential side.
- 1.11 The references to highways limitations were removed in respect of Bentwaters and its site-specific policy and replaced with positively worded pre-ambles simply noting that the site benefitted from the A1152 Suffolk Lorry Route Network.

- 1.12 In December 2017 a planning application for up to 290 dwellings was received by the Council and related to land part covered by policy SSP13 (the other Rendlesham housing allocation). That planning application included a transport assessment which recommended mitigation in the form of remedial measures to the A1152 to account for a “future scenario” where other potential development in and around Woodbridge and Melton came forward. The highways authority did not object to the planning application and confirmed it met NPPF policy (Enclosure 2).
- 1.13 As described in the First Draft Plan representations (Enclosure 3) in 2018 a planning application for 75 dwellings on the SSP12 site (now SCLP12.62) was refused but not for highways reasons. The County Highways Authority concluded that “The development will not negatively impact upon the highway network with regard to traffic flows” (Enclosure 4).
- 1.14 We trust it is therefore clear that no ‘highway factors’ currently exist or have existed in fact since the policy was first started to be drafted in 2014 which would justify the depression of housing numbers on the site.
- 1.15 Therefore, if it is accepted that there are no highway factors or evidence thereof the quantum of housing should be returned to the historic level of 75 dwellings.

The Education ‘Limiting Factor’

- 1.16 Paragraph 12.702 includes a new ‘limitation’ not included in the first draft plan which is not a proper limitation and should be removed.
- 1.17 The requirements of paragraphs 12.710 to 12.12.714 are noted because it is standard practice for a development to both generate new demand and to facilitate that new demand through CIL payments.
- 1.18 It is the role of the local education authority (Suffolk County Council) to ensure sufficient school places are available by building or extending schools to meet demand. Charging authorities may pass money to bodies outside their area to deliver infrastructure that will benefit the development of the area (PPG Paragraph: 082 Reference ID: 25-082-20140612).
- 1.19 Education capacity should not be a limiting factor to the number of homes if, as paragraphs 12.710 to 12.12.714 do, the local plan makes clear that CIL monies generated will address any capacity matters arising from a proposed development upon submission of a planning application.

The Cordon Sanitaire and Sewer ‘Limiting Factor’

- 1.20 The enclosed drawing (Enclosure 5) shows the accepted cordon sanitaire as required by Anglia Water and the existing sewers. The nett developable area is some 3.2ha. At a reasonable development density of 30 dwellings per hectare that would justify an allocation of 96 dwellings.
- 1.21 Paragraph 122 of the NPPF 2018 requires that “Planning policies and decisions should support development that makes efficient use of land”.
- 1.22 On the basis that the cordon sanitaire and sewers are clearly not limiting factors for potentially 96 dwellings then they are evidently not limiting factors for 75 dwellings. To make efficient use of the allocated site the number of dwellings should be increased from 50 back up to 75 dwellings.

Summary

- 1.23 In respect of Site SCLP12.62 Land West of Garden Square:
- The plan is **not positively prepared** because arbitrary ‘limiting factors’ have been cited to depress housing figures with no evidence provided to support them.
 - The reduction in the proposed housing figure from the long-established 75 dwellings to approximately 50 dwellings is therefore illogical and **unjustified**.
 - The resultant in-efficient use of land means the current policy approach is **inconsistent with NPPF paragraph 122**.

Appendix 1 Plan and Policy Changes Necessary for Soundness

The following table clearly sets out the existing text in the relevant part of the final draft local plan, suggested deletions (text is struck out ~~thus~~) and suggested insertions (text is underlined thus). Suggested major modifications are in **bold**. Minor modifications are not.

Paragraph/ Policy No.	Paragraph or Policy Text	Rationale for changes sought
12.698	These allocations are carried forward from the Site Allocations and Area Specific Policies Development Plan Document (January 2017). Land west of Garden Square is allocated for the development of approximately 50 <u>75</u> dwellings and also Land east of Redwald Road is allocated for the development of approximately 50 dwellings.	No change
12.699	Rendlesham (2011 pop. 3,013) is a Large Village in the settlement hierarchy which is altogether larger, and contains a much wider variety of facilities than is common to most other Large Villages in the District given its historic legacy as a former US Airforce base. <u>The village is connected to the A12 and to the larger settlements of Woodbridge and Ipswich via the A1152 which, these days is categorised as a Zone Distributor Route as part of the Suffolk Lorry Route Network, recognising the fact it was upgraded in the 1980s as a legacy of the village's military past when the airbase generated significant volumes of traffic.</u> It also has a 'made' Neighbourhood Plan, containing policies relating to the promotion of the village centre to continue to develop to meet the needs of existing and future residents, and the provision of allotments.	This change brings the preamble to this policy in line with that of policy SCLP12.41 Bentwaters (currently SSP24) which is on the opposite side of the road to the village of Rendlesham but also relies on the same road; the A1152.
12.700	The Neighbourhood Plan builds on the work of the earlier masterplan for Rendlesham and seeks to ensure that the village continues to develop and function to meet the needs of new and established residents and businesses, concentrating on the provision of services and facilities required to meet the needs of the new and growing population. Across the main road from the main residential area, is a large employment site containing a mix of uses (the former technical base). A comprehensive development plan for the whole employment site has been granted planning permission which will guide the future provision of employment land in this area.	No change
12.701	Whilst the Neighbourhood Plan does not allocate land for housing, Section 10 of the plan includes a number of objectives (3 – 3f) in relation to new housing e.g. to density and streetscene. In addition, Policy RNPP3 requires that new residential or mixed use development makes provision towards the identified local need for allotments, orchards and growing spaces.	

12.702	<p>In the longer term, the village may have capacity to accommodate more than the 100 125 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. Higher levels of growth are likely to trigger the need for new education and early years provision. There is a need to maintain a clear overview of the cumulative impact of individual developments on the local road network from Rendlesham through to Melton and the A12. The internal road layout within the village (a consequence of its original function as an airbase) means access from the village to the external road network is limited. There are also few opportunities to access the adjacent countryside due to lack of public footpaths and the presence of a perimeter fence, again a legacy of its former use as an airbase. The provision of a new footpath/bridleway is a condition <u>has been provided as a benefit of the</u> a recent planning permission for the <u>nearby</u> employment site providing residents with more direct access to Rendlesham / Tunstall Forest.</p>	<p>This change to the dwelling numbers reflects what these representations are seeking to achieve.</p> <p>The removal of the reference to highway factors is explained in the supporting arguments above.</p> <p>The removal of the reference to education capacity as a limiting factor is described above.</p> <p>The change to the reference to the right of way is simply updating the facts.</p>
12.703	<p>Two sites are allocated for large scale housing schemes which together can provide approximately 100 125 homes. Both sites provide the opportunity for additional community benefit as envisaged in the Neighbourhood Plan.</p>	<p>This change to the dwelling numbers reflects what these representations are seeking to achieve.</p>
12.704	<p>Development proposals for both allocations will need to investigate the cumulative traffic impact on air quality at Melton crossroads and the Air Quality Management Area declared in Woodbridge. An Air Quality Assessment, together with a mitigation appraisal, will be required.</p>	
12.705	<p>The site allocated as SCLP12.62 is the northern of the two sites identified on the plan above. The main limiting planning factors in respect of this site are its proximity to the Water Re-cycling Centre (sewage treatment works) which requires the provision of a 'cordon sanitaire', and the sewers that cross the site. The minimum distance for the cordon sanitaire will be a matter for discussion with Anglian Water as will any layout issues linked to the alignment of the sewers. The number of homes and the area on which development could take place has therefore been reduced to approximately 50.</p>	<p>These changes reflect the arguments in these representations that there is no evidence for the claimed limiting factors.</p> <p>This change to the dwelling numbers reflects what these representations are seeking to achieve.</p>
12.706	<p>Anglian Water confirmed that there is likely to be a need for improvements to the foul sewerage network. Land not suitable for building does however have the potential to provide for a mix of informal open space and allotment provision in accordance with Rendlesham Neighbourhood Plan objective 4, Allotments, Orchards and Growing Places and Neighbourhood Plan Policy RNPP3. Informal open space will provide space for daily dog walking and complement existing more formal green space provision nearby, as</p>	

	an alternative to the more sensitive Rendlesham and Tunstall Forests.	
12.707	The Cross Boundary Water Cycle Study between Suffolk Coastal District Council and Ipswich Borough Council identifies this site as being within Flood Zone 1. As the site area is over 1 ha, any proposals for development must be accompanied by a site-specific Flood Risk Assessment.	This paragraph is new text since the first draft local plan and we have no objections to its inclusion as general information.
12.708	The design and layout of the scheme will be expected to have due regard to the housing and transport objectives set out in the 'made' Rendlesham Neighbourhood Plan.	
12.709	Suffolk County Council Archaeology have also confirmed that the site lies within the former extent of Rendlesham Hall and within the broader landscape, where there is evidence of significant multi-period archaeological remains. An archaeological assessment at an appropriate stage in the design of the development will be required to allow for in-situ preservation as necessary.	
12.710	Rendlesham Primary School is operating close to capacity and, considering this allocation along with education forecasts, would be marginally over capacity during the first five years of the plan period. However, the provision of a greater proportion of housing designed to meet the needs of the elderly population or smaller dwellings could assist in addressing this. Farlingaye High School is currently operating over capacity with no immediate opportunities for expansion. A contribution will, therefore, be required through the Community Infrastructure Levy towards the creation of additional capacity at the proposed school at Brightwell Lakes to increase secondary education provision in the area.	This paragraph is new text since the first draft local plan and we have no objections to its inclusion.
12.711	Early years provision in Rendlesham ward is forecast to be over capacity and a contribution is therefore required through the Community Infrastructure Levy towards expansion of existing provision as set out in the Infrastructure Delivery Framework.	This paragraph is new text since the first draft local plan and we have no objections to its inclusion.
12.712	The East Suffolk & Ipswich Clinical Commissioning Group have indicated that additional primary care floorspace will be required at Rendlesham Medical Practice to meet the needs arising from new development. A contribution will be required through the Community Infrastructure Levy towards enhancements at Rendlesham Medical Practice, as detailed in the Infrastructure Delivery Framework.	This paragraph is new text since the first draft local plan and we have no objections to its inclusion.
12.713	Suffolk County Council have indicated that Foxhall household waste recycling centre is overcapacity and under pressure due to the site size and access from the highway. As a result, a contribution will be required through the Community Infrastructure Levy towards the expansion of the centre as identified in the Infrastructure Delivery Framework.	This paragraph is new text since the first draft local plan and we have no objections to its inclusion.

12.714	<p>Suffolk County Council have provided information relating to library improvements across the District. This site falls within the catchment of Woodbridge library which has been identified as a library where improvements are necessary to enhance provision. A contribution through the Community Infrastructure Levy will be requested towards the improvement of library provision as identified in the Infrastructure Delivery Framework.</p>	<p>This paragraph is new text since the first draft local plan and we have no objections to its inclusion.</p>
SCLP12.62	<p>5.05ha of land west of Garden Square, Rendlesham, as shown on the Policies Map, is identified for a mixed development of approximately 50 dwellings and greenspace provision.</p> <p>Development will be expected to accord with the following criteria:</p> <ul style="list-style-type: none"> a) Meet Reflect the minimum distance cordon sanitaire from the Water Recycling Centre within outside of which new residential development is considered acceptable as advised by Anglian Water; b) Accommodate the sewers that cross the site; c) The development will need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available; d) The design, layout, mix and type of housing proposed is compatible with the housing and transport objectives set out in the 'made' Rendlesham Neighbourhood Plan; e) Provision of affordable housing; f) The remaining greenspace should be used for a mix of informal open space suitable for daily dog walking, allotments or orchards in accordance with Rendlesham Neighbourhood Plan policy RNPP3; g) Provision of a substantial landscape buffer to the northern and western boundaries where it abuts open countryside; h) A site-specific Flood Risk Assessment is required; i) Evidence is required to demonstrate there is adequate provision for treatment at the Water Recycling Centre or that this can be provided; and j) An archaeological assessment will be required. <p>In addition, the air quality impacts of traffic from cumulative development at Melton crossroads and the Air Quality Management Area declared in Woodbridge will need to be investigated in the form of an Air Quality Assessment, together with a mitigation appraisal.</p>	<p>This change to the policy wording is intended to make the criteria make sense. Residential development within the cordon sanitaire is not acceptable to Anglian Water.</p> <p>This change is suggested reflecting the fact that the northern and western boundaries simply do not abut open countryside but rather adjoin dense woodland as shown on the enclosed aerial photograph (Enclosure 6).</p>

Enclosure 1

Your ref:

My Ref: KAB/
10/B/01

Date:
13/02/14

**UPDATE NOTE
2014 TRAFFIC VOLUMES
BENTWATERS PARK ACCESS.**

1. I have been advised by Evolution Town Planning that it is producing an update to the Environmental Statement relating to the Bentwaters planning application C10/3239/FUL.
2. In that regard, it seemed pertinent to update the vehicle flow data relating to the vehicle flows using the access to Bentwaters Park.
3. Please find attached three appendices from the Transport Assessment submitted with the planning application, which show the March 2010 recorded vehicle flows, as follows:

appendix	survey period	vehs in	vehs out	2 way flow [hgv]
KAB 11	morning peak hour	114	59	173 [16]
KAB 13	evening peak hour	41	151	192 [3]
KAB 15	24hrs flow	795	802	1597 [112]

4. Also attached, as documents (doc) 1 to 6 is the following information gleaned from an automatic traffic counter (ATC) which was located on the access road to Bentwaters Park, for a two weeks' period, commencing 15th January 2014.

Doc 1	location of ATC
Doc 2	vehicle classification table
Doc 3	vehicle volume summary - week 1 (two way flows)
Doc 4	vehicle volume summary - week 2 (two way flows)
Doc 5	vehicle class summary - week 1 (n/bound + s/bound + two way flows)
Doc 6	vehicle class summary - week 2 (n/bound + s/bound + two way flows)

5. From the ATC data, the following comparative 2014 recorded vehicle flows are noted.

Document	survey period weekday average	vehs in	vehs out	2 way flow [hgv]
Doc 3 & Doc 5 week 1	morning peak hour evening peak hour 24hrs flow	149 56 813	44 139 815	193 [5] 195 [5] 1628 [66]
Doc 4 & Doc 6 week 2	morning peak hour evening peak hour 24hrs flow	149 39 788	47 141 806	196 [5] 180 [1] 1594 [55]
All docs 14 days averages	morning peak hour evening peak hour 24hrs flow	149 48 801	46 140 811	195 [5] 188 [3] 1612 [61]

6. So, taking account of the average weekday figures over the fourteen day count period, the following comparison emerges for 2010 flows v 2014 flows.

year	survey period	vehs in	vehs out	2 way flow [hgv]
2010	morning peak hour	114	59	173 [16]
2014	morning peak hour	149	46	195 [5]
2010	evening peak hour	41	151	192 [3]
2014	evening peak hour	48	140	188 [3]
2010	24hrs flow	795	802	1597 [112]
2014	24hrs flow	801	811	1612 [61]

7. On the above basis,

- there has been a 13% increase in morning peak hour flows;
- there has been a 2% decrease in evening peak hour flows;
- there has been a 1% increase in daily flows; and,
- there has been a 45% decrease in daily hgv flows.

8. This indicates that there has not been any material increase in daily vehicle flows at the site over a (nearly) four year period, but there has been an increase in concentration of those flows during the morning peak hour, with a slight reduction in evening peak hour flows. There has been a significant reduction in daily hgv flows.

9. As will be seen, from point 6, this increase in morning peak hour flows is made up of:
- | | | | |
|----|-------------------------------------|---------|---------|
| a) | an increase in inbound flows of | +35 vph | and, |
| b) | a decrease in outbound flows of | -13 vph | giving, |
| c) | an overall increase in two flows of | +22 vph | |
10. Considering the 13% increase in the morning peak hour flows, and using the future assessed vehicle flows and proportions for the morning peak hour (from KAB 26 - also attached) from the 2010 TA, will result in an increase in the assessed future vehicle flows, on the five arms of the existing roundabout, as follows:
- | | | | |
|----|-----------------|-------------|--------|
| a) | B1069 | [27 x 0.13] | 4 vph |
| b) | Redwald Road | [1 x 0.13] | 0 vph |
| c) | Acer Road | [7 x 0.13] | 1 vph |
| d) | A1152 | [37 x 0.13] | 5 vph |
| e) | Bentwaters Park | [72 x 0.13] | 10 vph |
11. Clearly, these are increases in the future additional vehicle flows of a low order, and are not at any material level. Overall, when one takes into account that, in practical terms;
- | | |
|----|--|
| a) | there has not been any increase in daily vehicle flows at the site; |
| b) | there has not been any change in evening peak hour flows; |
| c) | there has been a significant decrease in daily hgv flows; and, |
| d) | even though there has been a small increase in vehicle numbers during the morning network peak hour, even then, the future assessed flows for that peak hour will not be materially increased, |
- then, it follows that no changes need to be made to the TA submission, which remains valid.
12. On the basis of the information submitted in this update note, the conclusions of the 2010 Transport Assessment remain the same i.e.

There will not be any material increase in vehicle flows on the adjacent highway network, and the total vehicle flows will not exceed the baseline flows set by the County Council.

Keith A. Berriman – Director – The HTTC Ltd.

Your ref:

My Ref:
KAB/10/B/01

Date:
13/02/14

**BRIEF SUPPLEMENTARY
TRANSPORT ASSESSMENT**

**IN RESPECT OF AN APPLICATION FOR
CHANGE OF USE OF BUILDINGS AND LAND
AT
THE FORMER BENTWATERS AIR BASE.**

Report of:
Keith A. Berriman

Page 1 of 8

**Director
Keith A. Berriman I.Eng., FIET, FIHE, FCIHT, CMILT**

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2.00	CONCLUSIONS.	7.

KEITH ANTHONY BERRIMAN - EXPERIENCE & QUALIFICATIONS.

I am an Incorporated Engineer, a Fellow of the Institution of Engineering & Technology, a Fellow of the Institute of Highway Engineers, a Fellow of the Chartered Institution of Highways & Transportation, and a Chartered Member of the Institute of Logistics and Transport.

I have been engaged in the practise of highway and traffic engineering for nearly forty years, specifically in relation to considering and advising upon development proposals.

I have worked in both the public and private sector since 1975, and have been an independent consulting engineer since 1988.

I provide specialist highway, traffic and transport advice to developers, Local Authorities, planning consultants, architects, and engineering consultants, on the highway, traffic and transport aspects of all development proposals.

I have advised on all types of development proposals including, residential, commercial, leisure, education, retail, and roadside services developments: having advised on small and large examples of such projects.

Over the years, I have given highway and traffic evidence at many public inquiries, including Section 78 inquiries. Local Plan Inquiries, and Roads Inquiries.

Formerly, I was Head of Highways Development Control at Essex County Council. I am now Director of The Highway Traffic & Transport Consultancy Ltd (The HTTC Ltd).

I have carried out investigations, for the purposes of providing this report.

Keith A. Berriman
I.Eng., FIET, FIHE FCIHT, CMILT.

1.00 INTRODUCTION.

1.01 This Supplementary Transport Assessment (STA) document considers the changes in the highway, traffic and transport issues, which may have occurred since the submission of the original TA in 2010. The TA relates to the proposed change of use of buildings and land at the former Bentwaters Air Base. This STA should be read in conjunction with the 2010 TA, and other documents submitted by the applicant's planning adviser, Evolution Town Planning. All references to appendices beginning with "KAB", are references to appendices in the 2010 TA.

1.02 The appendices from the original 2010 TS (KAB 4 & 5) confirmed that the A1152, and its north eastern extension, the B1069, are identified as part of the Suffolk lorry route network, being a

Zone Distributor Lorry Route – i.e. Roads within a zone serving as a route to a location or as a route to local access routes (see KAB 5 – Introduction).

This remains the situation in 2014, and as such, this route has been targeted by the County Highway Authority (CHA) as being adequate to:

accommodate lorries safely and to minimise their impact on roads, other than on the main network, by discouraging the use of minor roads except for essential movements (see KAB 5 – Objectives of the plan).

1.03 The 2010 TA concluded:

there will not be any material increase in vehicle flows on the adjacent highway network, and the total vehicle flows will not exceed the baseline flows set by the County Council.

1.04 This conclusion, and arguments set out in the TA, and in subsequent documents, were accepted by the County Highway Authority (CHA), which raised no objections to the proposals.

1.05 The purpose of this STA is to note various new and amended documents which are now submitted to assist in the submission of an update to the Environmental Statement (ES), as requested by the LPA. Consequently, the section of the ES which relates to highway, traffic and transport issues has been amended in line with these documents.

1.06 For highway purposes, the new document is the HTTC document, "Update note – 2014 traffic volumes - Bentwaters Park access", which has been produced and is submitted with the updated EA document. This note updates the vehicle flow data relating to the vehicle flows using the access to Bentwaters Park, and assesses if that new data will have any material impact on the considerations of the 2010 TA.

1.07 The update note concludes as follows.

Clearly, these are increases in the future additional vehicle flows of a low order, and are not at any material level. Overall, when one takes into account that, in practical terms;

- a) there has not been any increase in daily vehicle flows at the site;*
- b) there has not been any change in evening peak hour flows;*
- c) there has been a significant decrease in daily hgv flows; and,*
- d) even though there has been a small increase in vehicle numbers during the morning network peak hour, even then, the future assessed flows for that peak hour will not be materially increased.*

Hence it follows that no changes need to be made to the TA submission, which remains valid.

12. *On the basis of the information submitted in this update note, the conclusions of the 2010 Transport Assessment remain the same i.e.*

There will not be any material increase in vehicle flows on the adjacent highway network, and the total vehicle flows will not exceed the baseline flows set by the County Council.

1.08 On the above basis, this STA can confirm that the conclusions of the original 2010 TA still remain correct, and are repeated in the following section.

2.00 CONCLUSIONS.

- 2.01** The A1152, and its north eastern extension, the B1069, are identified as part of the Suffolk lorry route network, being a *Zone Distributor Lorry Route – i.e. Roads within a zone serving as a route to a location or as a route to local access routes.* As such, this route has been targeted by the County Highway Authority (CHA) as being adequate to: *accommodate lorries safely and to minimise their impact on roads, other than on the main network, by discouraging the use the use of minor roads except for essential movements.* The application site takes direct access to that route.
- 2.02** A meeting with the CHA resulted in the updating of earlier guidance and advice to the Local Planning Authority, and set out an agreed way forward by which the TA would be properly informed. The TA has followed this agreed way forward.
- 2.03** One of the main issues to be advanced by the CHA, was the use of a data spreadsheet which set out the CHA's calculations of the agreed baseline vehicle flows which the site already generates, and, which it considers are capable of being accommodated on the local road network. The SCC position is that, *This should be the baseline upon which any further change of use, and hence change of traffic, is judged.*
- 2.04** Bentwaters is unusual in transport assessment terms, since it is often the case that large gfa's produce large vehicle flows. This is not the case at Bentwaters because much of the gfa is taken up with uses which do not (or will not) produce large vehicle flows, such as B8 (storage only) uses. Indeed, a number of uses result in the removal of hgv flows from the local road network.

- 2.05** A detailed traffic survey was carried out of vehicle flows at the Bentwaters site, on the surrounding roads, and through Eyke village. Using this data, and data confirming which site uses were operational at the time of the survey, a calculation was made of the “worst case” peak hour and daily flows at the site access, and on the adjacent road network. The “best case” (lower) flows are some 50% less, but, only the worst case flows are considered in the TA, as a realistic 85th %ile test.

[NB – as set out in the 2014 STA, the survey data for the site access has been updated.]

- 2.06** These figures demonstrate that the CHA’s spreadsheet, baseline flows are not exceeded, and, as such, there will not be any material increase in vehicle flows over the CHA’s baseline flows. On that basis, no adverse highway capacity or highway safety arguments can be advanced. Hence, no legitimate highway objections can be raised against the proposals.

- 2.07** Notwithstanding this conclusion, further work has been submitted to consider matters such as: actual vehicle flows through Eyke village; traffic calming possibilities in Eyke village; travel plan proposals; the historical and current accident records; and, specific hgv accident records.

- 2.08** Whilst there has been much previous mis-information in terms of traffic data, the current data is clear in demonstrating that the proposals are acceptable in highway, traffic and transport terms.

Enclosure 2

Your Ref: DC/17/5380/OUT
Our Ref: 570\CON\0258\18
Date: 23/03/18
Highways Enquiries to: ben.chester@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.

The Planning Officer
Suffolk Coastal District Council

For the Attention of: Graham Nourse

Dear Graham

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN DC/17/5380/OUT**

PROPOSAL: Outline Planning Application for up to 290 dwellings, Car Parking, Open space, Including the provision of Allotments with Associated Infrastructure and Access
LOCATION: Land On, Redwald Road, Rendlesham
ROAD CLASS: B

Notice is hereby given that the County Council as Highway Authority make the following comments:

Further to receiving a Technical Note from the applicant's transport consultant on 22nd March 2018, the following comments are made setting out the latest position of the Highway Authority with regard to the above proposal. Comments are also made to clarify the position of the Highway Authority on the proposed mitigation at Melton crossroads.

1. Junction Modelling: The additional modelling of the A1152 Orford Road / B1083 Roundabout has identified that the A1152 Orford Road arm would be approaching operational capacity in the '2022 with development' scenario. The applicant has proposed widening of this arm to increase capacity. We would require these works to mitigate this impact on this junction to make the development acceptable to the Highway Authority. The other modelled junctions are acceptable following submission of the information requested. Please see comments overleaf relating to Melton crossroads.
2. Access Layout: The amendment to provide the secondary emergency access onto Redwald Road (shared with the pedestrian/cycle route) is acceptable in principle subject to details of the measures to prevent non-emergency vehicle usage. The main vehicular access is acceptable subject to minor amendments to provide space for services and provide visibility on the northern side.
3. Pedestrian Crossing Facilities: The proposed pedestrian crossing facilities on Redwald Road and Acer Road are acceptable.

4. Speed Limit: The acceptance of the speed limit reduction contribution is welcomed and agreed.
5. Travel Plan Comments: The SCC Travel Plan officer has provided comments overleaf.
6. PROW Comments: The acceptance of the PROW contribution is welcomed and agreed.
7. Passenger Transport: The SCC Travel Plan officer has provided comments on the passenger transport provision overleaf.
8. Framework Travel Plan: The SCC Travel Plan officer has provided comments overleaf.

Melton Crossroads:

In the view of the Highway Authority, the proposed mitigation scheme to widen the A1152 Wilford Bridge Road and A1152 Woods Lane arms mitigates the impact of this proposal on the junction. This is the reason for acceptance by the Highway Authority. The mitigation scheme may not provide capacity improvements that would enable the impact of other developments to be accommodated, other than background growth. This is due to the limited highway area available at the junction.

The previously accepted modelling of the junction did not include allocated sites, only those that we considered 'committed' (permitted sites).

We carried out sensitivity testing during the assessment of the above mitigation that identified that the combined impact of this site, recently refused Yarmouth Road, Melton site and the allocated site at Wilford Bridge may push the junction beyond its operational capacity despite the proposed improvements. This was based on estimated traffic flows of the allocated site so cannot be relied upon with great confidence.

SCC Travel Plan Comments:

The Framework Travel Plan response in Appendix I of the Technical Note (dated 22nd March 2018) has addressed the majority of the Travel Plan concerns in regards to the implementation and monitoring of it. The inclusion of the additional pedestrian and cycle access point to Redwald Road will improve the active and sustainable transport links to the existing Rendlesham amenities. Nevertheless, it has not addressed the issues with the opportunities to use the bus for commuting purposes, as the existing services for the buses serving the nearest bus stop would not be suitable for commuting purposes, which will provide no alternative to commute to and from the site by private motor vehicle. The suggestion that residents could cycle to Wickham Market rail station and use the cycle parking provided at the station is possible, however not all residents would be willing to undertake this on a daily basis, as it would be more convenient and quicker for them to use the car to travel to the destinations that Wickham Market rail station serves. Also the cycle parking that is provided at the station may not be suitable for long-stay cycle parking, as it may not be perceived as being secure and weatherproof, where no measures have been identified in the Travel Plan to help overcome these issues.

However, in highway terms the traffic modelling is robust and there would not be a 'severe' highway impact in the event that the Travel Plan fails to reduce the number of vehicular trips. There should still be some remedial measures identified in the Travel Plan secured through suitable S106 obligations to ensure the predicted trip rates are not exceeded when the site has been occupied.

If consent is granted at the Planning Committee, the actions stated in the Technical Note must be incorporated into a revised Travel Plan to either be secured prior to the signing of the Section 106 agreement, or an obligation to submit a revised Travel Plan prior to commencement of the development. The obligations needed were identified in the original SCC Highway response (dated 6th February 2018).

Yours sincerely,

Mr Ben Chester
Senior Development Management Engineer
Strategic Development

Enclosure 3

Suffolk Coastal District Council
First Draft Local Plan Consultation
2018

**Representations in Respect of Policy SCLP12.57: Land
West of Garden Square Rendlesham**

September 2018



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Planning Excellence



Opus House
Elm Farm Park
Thurston
Bury St Edmunds
Suffolk
IP31 3SH

T 01359 233663
E enquiries@evolution-planning.co.uk
W evolution-planning.co.uk

Suffolk Coastal District Council First Draft Local Plan Consultation

Representations in Respect of Policy SCLP12.57: Land West of Garden Square
Rendlesham

Reference: E382.C1.Rep05

1.0 Representations in Respect of Policy SCLP12.57: Land West of Garden Square Rendlesham

- 1.1 These representations have been submitted on behalf of Capital Community Developments. These representations object to Planning Policy SCLP12.57: Land West of Garden Square Rendlesham. The policy allocates the site for housing. The principle of the allocation of the site for housing is supported. The objection is that the site should be allocated for 75 homes and not 50 homes.
- 1.2 The site is identified in the current Local Plan and referred to as site SSP12 and is allocated for housing development. The Local Plan states that the site has been identified by the District Council as appropriate for approximately 50 dwellings. The Local Plan allocates approximately 100 homes to Rendlesham as its contribution to the overall minimum housing requirements across the district. The Local Plan also says that *“the village [of Rendlesham] has capacity to accommodate more than the 100 homes proposed”*.
- 1.3 During 1996-2013 the site had a Local Plan allocation of 75 homes. This allocation was reduced in the current Local Plan to 50 units on the grounds of transport impact and the need for a cordon sanitaire around the sewerage works. Subject to the resolution of these constraints there should be no reason why the site cannot accommodate 75 homes.
- 1.4 Rendlesham is a sustainable location for housing it is classified as a Large Village in the Settlement Hierarchy of the First Draft Local Plan. This draft Local Plan states (paragraph 12.424): *“Rendlesham is a Large Village in the settlement hierarchy which is altogether larger, and contains a much wider variety of facilities than is common to most other Large Villages in the District given its historic legacy as a former US Airforce base.”* The village of Rendlesham is also next to the large employment site that exists on the former US Airforce base. This offers the potential for homes and places of work to be located close to each other improving the sustainability of the locality. Rendlesham is therefore a sustainable location for new housing.
- 1.5 Rendlesham is on the edge of the Area of Outstanding Natural Beauty (AONB). The AONB designation constrains the delivery of housing within it on landscape grounds. Rendlesham is a good location outside of the AONB where housing can be provided to serve this area.

- 1.6 The First Draft Local Plan identified two constraints to the allocation of more than 50 homes on the site. These are set out in paragraph 12.427 which states: *"The village 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."*
- 1.7 Paragraph 12.430 states: *"The site allocated as SCLP12.58 is the northern of the two sites identified on the plan above. The main limiting factors in respect of this site are its proximity to the Water Re-cycling Centre (sewage treatment works) which requires the provision of a 'cordon sanitaire', and the sewers that cross the site. The minimum distance for the cordon sanitaire will be a matter for discussion with Anglian Water as will any layout issues linked to the alignment of the sewers. The number of homes and the area on which development could take place has therefore been reduced to approximately 50."*
- 1.8 A recent planning application on the site reference. DC/18/2374/FUL, proposed the residential development of 75 homes, car parking, open space, hard and soft landscaping and associated infrastructure and access. This application was refused on the 6th September 2018. The planning application was not refused because of highways issues or because of issues with the Water Re-cycling Centre. The reasons for refusal identified that the additional 25 homes were above the current Local Plan allocation, concerns were raised over the design and layout, and the application lacked a completed S.106 agreement at the date of refusal. The decision notice is included in Appendix 1.
- 1.9 None of the reasons for refusal would prevent the new Local Plan allocating the site for 75 homes. Design issues and a S.106 agreement can be addressed at the planning application stage.
- 1.10 We attach at Appendix 2 the masterplan from the planning application DC/18/2374/FUL. The purpose of including this plan with these representations is to demonstrate that 75 homes can be accommodated on the site without conflict with the Water Re-cycling Centre and in a manner that is acceptable to Suffolk County Highways.
- 1.11 In response to the planning application Suffolk County Highways stated: *"I am satisfied that the development will not negatively impact upon the highway network with regard to traffic flows."*
- 1.12 Rendlesham Parish Council is a parish with considerable experience of planning. They have a Made Neighbourhood Plan. The Parish Council supported the planning application and made no objection to the number of homes proposed on the site.

- 1.13 The National Planning Policy Framework (The Framework) states in paragraph 77 that: *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.”* The support from the Parish Council is evidence that that developing 75 homes would meet local needs. Paragraph 78 of The Framework states that: *“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”* Developing in Rendlesham would support services in nearby villages where housing growth is constrained by the AONB or other issues.
- 1.14 The revised Framework (July 2018) includes a new set of policies that were not included or as clearly emphasised or set out in the 2012 version. These policies start with paragraph 122 and state that: *“Planning policies and decisions should support development that makes efficient use of land, taking into account:*
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
 - b) local market conditions and viability;*
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
 - d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
 - e) the importance of securing well-designed, attractive and healthy places.”*
- 1.15 There is nothing that has been highlighted in the consideration of the recent planning application which demonstrates that if the site is allocated for 75 homes that the criteria (a) to (e) cannot be met.
- 1.16 The site is approximately 5 hectares in size. Developing 75 homes on the site, as the masterplan shows, would leave a considerable area for open space, and wildlife corridors and walking routes can be created around the site.

- 1.17 The site is well screened from the surrounding area and is well related to the built up area of Rendlesham. The site is relatively flat and bounded by woodland on the north and west boundaries and residential development on the east and south boundaries. Further to the north, beyond the woodland, the predominant land use is agricultural. Just to the north of the site is the Water Re-cycling Centre. The site is shown on the photograph below. There are therefore no design or landscape reasons why the site could not be allocated for 75 homes.



- 1.18 Allocating the site for 75 homes would:

- Make more efficient use of land on an allocated housing site where there are no constraints to the increase to 75 homes.
- Boost the supply of housing in line with the policies of The Framework.
- The sustainable location of the site within the settlement boundary of a key service centre/large village.
- Have very limited environmental or landscape impacts.
- Contribute towards local infrastructure through the Community Infrastructure Levy.
- Provision of significant on-site pedestrian links to the wider village and village centre.
- Be an efficient use of land and an appropriate development density which reflects local development density.

- 1.19 In response to the recent planning application there were no objections from many consultees to the proposal for 75 homes as set out below:

- Suffolk County Highways stated: *"I am satisfied that the development will not negatively impact upon the highway network with regard to traffic flows."*
- Environmental Protection: Had objections to the application, and recommended that a condition was added to ensure that any unexpected contamination that was found or suspected on the site must be reported in writing immediately to the Local Planning Authority, including its remediation and mitigation.
- Landscape Officer: There was no objection to the application as there would not be any significant adverse landscape or visual impacts arising from this proposal, it was advised that full landscape enhancement proposals should be secured by Condition.
- Environment Agency: They did not know why they were consulted on the application.
- Suffolk County Council Flooding Authority: There was no objection to the application subject to conditions.
- Suffolk County Council Development Contributions Manager: Apart from any site-specific matters to be secured by way of a planning obligation or planning conditions, there would be a future bid to Suffolk Coastal District Council for CIL funds if planning permission was granted and implemented.
- Suffolk Constabulary objected on design grounds, however the issues can be resolved by the development management and detailed design process.
- Suffolk County Council Archaeology: Had no objection subject to conditions.
- Anglian Water: Conditions and Informatives were requested to be added to any decision notice, if the application was to be recommended for approval.
- Suffolk County Council Rights of way had no objection in principle subject to the creation of appropriate pedestrian and cycling links.
- NHS England Midlands and East had no objection.

- Natural England would be happy with the scheme subject to the appropriate mitigation of the recreational disturbance impacts of the development. This would be addressed through S.106 or District wide measures.

1.20 In summary there are no constraints to the increase in the allocation from 50 to 75 homes. Such an allocation would be:

- Positively Prepared as it would meet the housing needs of the village and the wider area.
- Justified – allocating the site for 75 homes would be an appropriate strategy for an allocation as it would be well related to the built up area and has good road vehicular access with no constraints to development for that number of homes.
- The allocation would be Effective and deliverable as there is developer interest in building in Rendlesham.
- The allocation for 75 homes would be more consistent with national planning policy which supports development in rural areas and the efficient use of land.

1.21 We therefore support the allocation of the site for housing and object to the number of homes proposed which should be increased from 50 to 75.

Enclosure 4

Your Ref: DC/18/2374/FUL
Our Ref: 570\CON\2738\18
Date: 12/07/18
Highways Enquiries to: ben.chester@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.

The Planning Officer
Suffolk Coastal District Council

For the Attention of: Jane Rodens

Dear Jane

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN DC/18/2374/FUL**

PROPOSAL: Proposed residential development of 75 dwellings, car parking, open space, hard and soft landscaping and associated infrastructure and access.

LOCATION: Land to the North & west of Garden Square &, Gardenia Close, Rendlesham, Woodbridge, Suffolk

ROAD CLASS: U

Notice is hereby given that the County Council as Highway Authority make the following comments:

1. Development related vehicle flows and highway impacts: With regard to section 5 of the supplied Transport Statement, it is noted that the calculated peak hour vehicle trip rates are very low due to the travel patterns of occupiers of the surveyed area. As no guarantees appear to be provided about the occupiers of the proposed dwellings (whether they will share the same travel patterns as the surveyed area in perpetuity), a robust assessment of the impacts should be provided using another method such as TRICS data. It is noted that we would expect peak hour 2-way vehicular trip rates of around 0.6 per dwelling in this location.
2. Development Layout: The layout of the development roads and footways do not provide adequate pedestrian provision within the site (relating to NPPF para. 35) due to a lack of footway provision and subsequently, would not be suitable for adoption by the Highway Authority. Whilst shared surface roads do not require footways, the other access roads should benefit from footways on both sides. In addition, the Highway Authority would not consider the proposed layout for adoption due to junction spacing, lack of visibility from junctions, centre line radius, road width, lack of clarity over road types, lack of service strips and junction access radii.

3. Highway Access: It is noted that there is one proposed direct highway access point onto Tidy Road. The proposed access point to Garden Square does not link directly to the highway as Garden Square is not an adopted road. The access onto Tidy Road and the junction of Garden Square with Sycamore Drive are considered adequate to serve a development of this scale.

Please consider this a holding objection until points 1 and 2 are addressed. Highway related planning conditions will be necessary and will be supplied once the above comments are addressed.

The following comments were received from SCC Travel Plan Officer; SCC Public Rights of Way team and; SCC Passenger Transport:

SCC Travel Plan Officer:

Should the proposal be permitted, the following conditions are recommended:

Condition: Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Pack (RTP). Not less than 3 months prior to the first occupation of any dwelling, the contents of the RTP shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include walking, cycling and bus maps, latest relevant bus and rail timetable information, car sharing information, personalised travel planning and a multi-modal travel voucher.

Reason: In the interests of sustainable development and health objectives as set out in the NPPF, and policy DM20 of the Suffolk Coastal District Local Plan Core Strategy & Development Management Policies (2013)

SCC can design and produce a travel pack on behalf of the applicant provided that a suitable Section 106 contribution can be agreed.

Condition: Before the development hereby permitted is occupied full details of the electric vehicle charging points to be installed in the development shall have been submitted to the Local Planning Authority and approved in writing.

Reason: To ensure that the development makes adequate provision for electric vehicle charging points to encourage the use of electric vehicles in accordance with paragraph 3.4.2 of the Suffolk Guidance for Parking and paragraph 35 of the National Planning Policy Framework.

SCC Public Rights of Way team:

Should the proposal be permitted, the following S106 contribution is requested:

We would like to request that a bridleway be created along the track which runs along the eastern side of the site, as this would link the estate to the wider countryside. The Rendlesham estate is currently poorly served in terms of public rights of way and access to the countryside, therefore we feel that this link would help to fill that gap for this development and the wider estate.

Estimated Costs:

Compensation £3,337.50
Staff and design time 12% £400.50
Contingency 10% £333.75
Order-making costs £4,000
Total £8,071.25

SCC Passenger Transport:

Should the proposal be permitted, the following S106 contribution is requested:

This site could be served by residents walking through to the current routes and not need additional infrastructure, but it would also make sense to add Sycamore Drive – that is already covered by a school route and has stops in place built when the roads were and just not used up to now. For me, as a minimum, I would request a £15k contribution for a solar-powered real time screen at the stop on Redwald Road opp Sparrowscroft Road as that already has a shelter and would be the best bet for walking to from this site. If Sycamore Drive is going to be used there is space for a shelter and screen at the stop there opposite Gardenia Close – which would be another £20k.

Yours sincerely,

Mr Ben Chester
Senior Development Management Engineer
Strategic Development

From:d.c.admin
Sent:03 August 2018 15:38
To:pbc
Subject:FW: DC/18/2374/FUL - 75
DWELLINGS - RENDLESHAM - SP12 - KAB
to BC -
240718

From: Jane Rodens
Sent: 03 August 2018 15:27
To: d.c.admin
Subject: FW: DC/18/2374/FUL - 75
DWELLINGS - RENDLESHAM - SP12 - KAB
to BC - 240718

Hello,
Can this be added to DC/18/2374/FUL
Thank you
Jane

From: Ben Chester
[mailto:Ben.Chester@suffolk.gov.uk]
Sent: 30 July 2018 14:01
To: kab@the-httc.co.uk
Cc: 'Steven'; 'Anthony Hardy';
'Jeanie'; Jane Rodens; Chris Ward
Subject: RE: DC/18/2374/FUL - 75
DWELLINGS - RENDLESHAM - SP12 - KAB
to BC - 240718

Dear Keith,
Thank you for the responses to my
queries.
I am satisfied that the development
will not negatively impact upon the
highway network with regard to
traffic flows. Thank you for the
additional assessment.
I will await contact from the
applicant/designer with regard to the
internal site layout roads and
footways.
Travel Plan query comments provided
by SCC Travel Plan officer (copied
in):
In answer to the questions raised by
the consultant:

*The Multi-modal voucher should be to the value of two one month bus tickets from the site to Ipswich. Current fare information can be found on <https://www.firstgroup.com/norfolk-suffolk/tickets/ticket-prices>. If the resident does not want to redeem the bus tickets, a cycle voucher of equivalent value should be offered to the resident instead.
*I can confirm that no Residential Travel Plan was requested by SCC or is required in our opinion, as developments less than 100 in Suffolk should be focused on delivering upfront measures (i.e. provision of information and one-off sustainable transport measures) instead of committing to a long-term management strategy. This links in with the best practice for the concept of the Travel Plan Statement for developments between 50-80 dwellings in the DFT "Delivering Travel Plans Through the Planning Process" guidance.

I am awaiting responses from our Passenger Transport and PROW officers regarding their S106 contribution requests. I will forward these as I receive them.

Kind Regards

Ben Chester

Senior Development Management
Engineer (East Suffolk)
Growth, Highways and Infrastructure
Suffolk County Council, Endeavour
House, 8 Russell Road, Ipswich, IP1
2BX

Office: 01473 260433

Mobile: 07860 830865

Email: ben.chester@suffolk.gov.uk
From: Keith Berriman - The HTTC Ltd.

[REDACTED]
Sent: 24 July 2018 16:50
To: Ben Chester
<Ben.Chester@suffolk.gov.uk>
Cc: 'Steven'
<Steven@evolution-planning.co.uk>;
[REDACTED]

'Jeanie' [REDACTED]
'Jane Rodens'
<Jane.Rodens@eastsuffolk.gov.uk>
Subject: RE: DC/18/2374/FUL - 75
DWELLINGS - RENDLESHAM - SP12 - KAB
to BC - 240718
Importance: High

Dear Ben,
Please find below an email from Jane Rodens, of the LPA, referring to your letter of 12th July 2018 (copy attached for reference).
Please also find attached, my responses to your queries. I trust that these will be adequate for your purposes.
As indicated, I would welcome your further advice on these matters, and hope that you can now confirm that no highway objections are raised against the proposal, subject only to your further discussions, direct with the applicant, about the internal layout (see point 4. of the letter).
I am afraid that I will now be away from the office until next Thursday, but, will be happy to contact you on my return, if you feel that is necessary.

Kind Regards,
Keith.
The HTTC Ltd.
The Highway Traffic & Transport
Consultancy
Registered in England & Wales -
Company No. 5652127
Director - Keith A. Berriman I.Eng.,
FIET, FIHE, FCIHT, CMILT
The HTTC Ltd. - 2, Keeble Close,
Tiptree, Essex. CO5 0NU (Registered
Office).
tel. 01621 818505

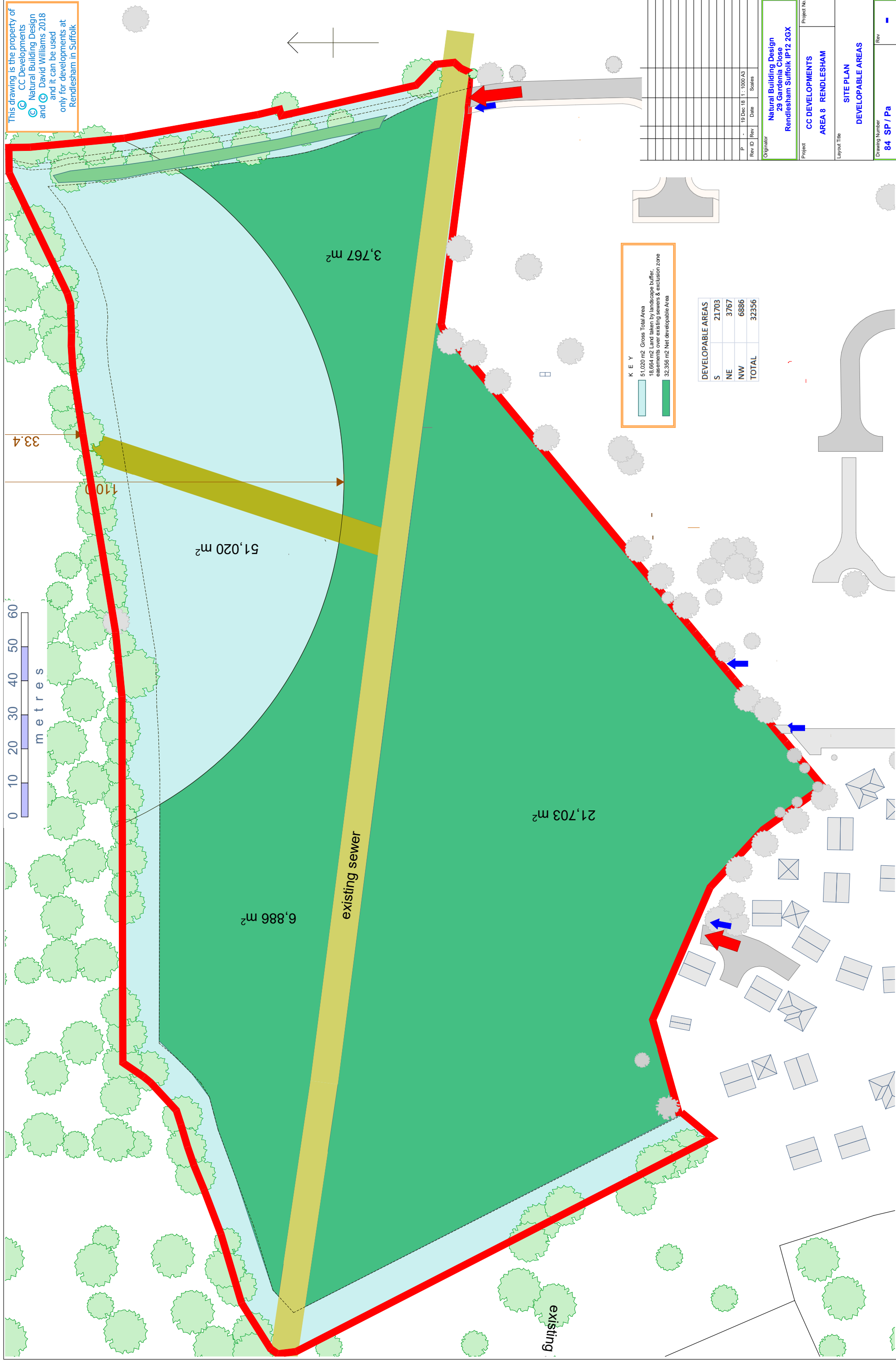
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The HTTC Ltd. cannot accept any
liability for the integrity of this
message or its attachments.
From: Steven
[mailto:Steven@evolution-planning.co.uk]
Sent: 18 July 2018 16:26

To: Jane Rodens
Subject: RE: DC/18/2374/FUL
Good afternoon Jane,
Further to our telephone conversation
earlier we are already aware of the
CHA response and are
dealing.
Regards,
Steven Bainbridge MSc MRTPI
Associate
Evolution Town Planning Ltd.
Opus House Elm Farm Park Thurston
Bury St Edmunds Suffolk IP31 3SH
T: 01359 233663 M: 07803 505258
www.evolution-planning.co.uk
From: Jane Rodens
[mailto:Jane.Rodens@eastsuffolk.gov.uk
]
Sent: 18 July 2018 11:37
To: Steven
<Steven@evolution-planning.co.uk>
Subject: DC/18/2374/FUL
Hello,
I have received the attached comments
from Suffolk County Council Highways,
would it
be possible to provide the additional
information to myself.
Regards
Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District
Councils
Tel: (01394) 444505
Mobile: 07919303788
Jane.rodens@eastsuffolk.gov.uk
Suffolk Coastal and Waveney District
Councils are working as a partnership
and all
emails received from us will use the
@eastsuffolk.gov.uk email address
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be confidential. If they have come to
you in error you must take no action
based on them, nor
must you copy or show them to anyone;
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highlight the error.
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knowledge that Internet
email is not a 100% secure
communications medium. We advise that
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Enclosure 5

[illegible]

Originator
Natural Building Design
29 Gardenia Close
Rendlesham Suffolk IP12 2GX

Project	Project No
CC DEVELOPMENTS AREA 8 RENDLESHAM	

Layout Title	
SITE PLAN DEVELOPABLE AREAS	

Drawing Number	Rev
84 SP / Pa	-

Enclosure 6

Aerial photo showing blocks of woodland west and north of site.



Ground level photo taken from the end of Gordon Square looking west to the woodland.



Aerial photo looking north.



Aerial photo looking east.

Appendix 5

New Homes Bonus Calculator

Suffolk Coastal

[Return to homepage](#)

Current housing stock (Oct 14): 58,904
 Net change in stock (Oct 14)¹: 232
 Affordable housing supply (13/14)³: 56
 Stock of empty homes (Oct 14): 690
 Affordability ratio (2013)⁴: 7.09

Band	A	B	C	D	E	F	G	H	Total
Dwelling stock: (Oct 14)	13%	25%	20%	19%	13%	7%	4%	0%	58,904
Council tax: average national band (2014/15)	£978.65	£1,141.76	£1,304.87	£1,467.98	£1,794.20	£2,120.42	£2,446.63	£2,935.96	
Affordable Housing premium:									£350.00

Payment for one year:

Lower tier	Upper tier
£79,942	£19,986

Total net additions by band, including affordable homes:

Gross affordable housing units⁶
 (£350 per year premium):

Empty homes brought back into use⁵:

Traveller pitches⁶:

14	29	20	10	2	0	0	0	75
25								25
0	0	0	0	0	0	0	0	0
0								0

Total payment over 6 years:

Lower tier	Upper tier
£479,654	£119,913

Assumptions:

1. Net additional dwellings are calculated by subtracting effective stock (total stock less long-term empty homes, and demolitions) as recorded on the CTB in one year from the previous year.

<https://www.gov.uk/government/publications/new-homes-bonus-final-scheme-design--2>

2. Data taken from the Council Tax Base form: <https://www.gov.uk/government/statistics/council-taxbase-2014-in-england>

3. Data taken from Affordable housing supply in England: 2013 to 2014, and the additional number of permanent traveller caravans ("Count of traveller caravans: July 2014")

(<https://www.gov.uk/government/organisations/departments-for-communities-and-local-government/series/affordable-housing-supply>)

(<https://www.gov.uk/government/statistics/traveller-caravan-count-july-2014>)

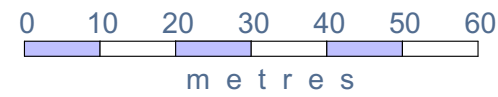
4. Affordability is measured by the ratio of lower quartile house price to lower quartile earnings (Livetable 576): <https://www.gov.uk/government/statistical-data-sets/live-tables-on-housing-market-and-house-prices>

5. Long term empty homes are measured by Line 18 of the CTB 2014 form. This number was previously recorded in line 16c in the CTB 2013 form. The number brought back into use is calculated by subtracting the stock of empty homes in the current year from the previous year to give the net change. If there is an increase in the number of empty homes, enter this as a negative figure.

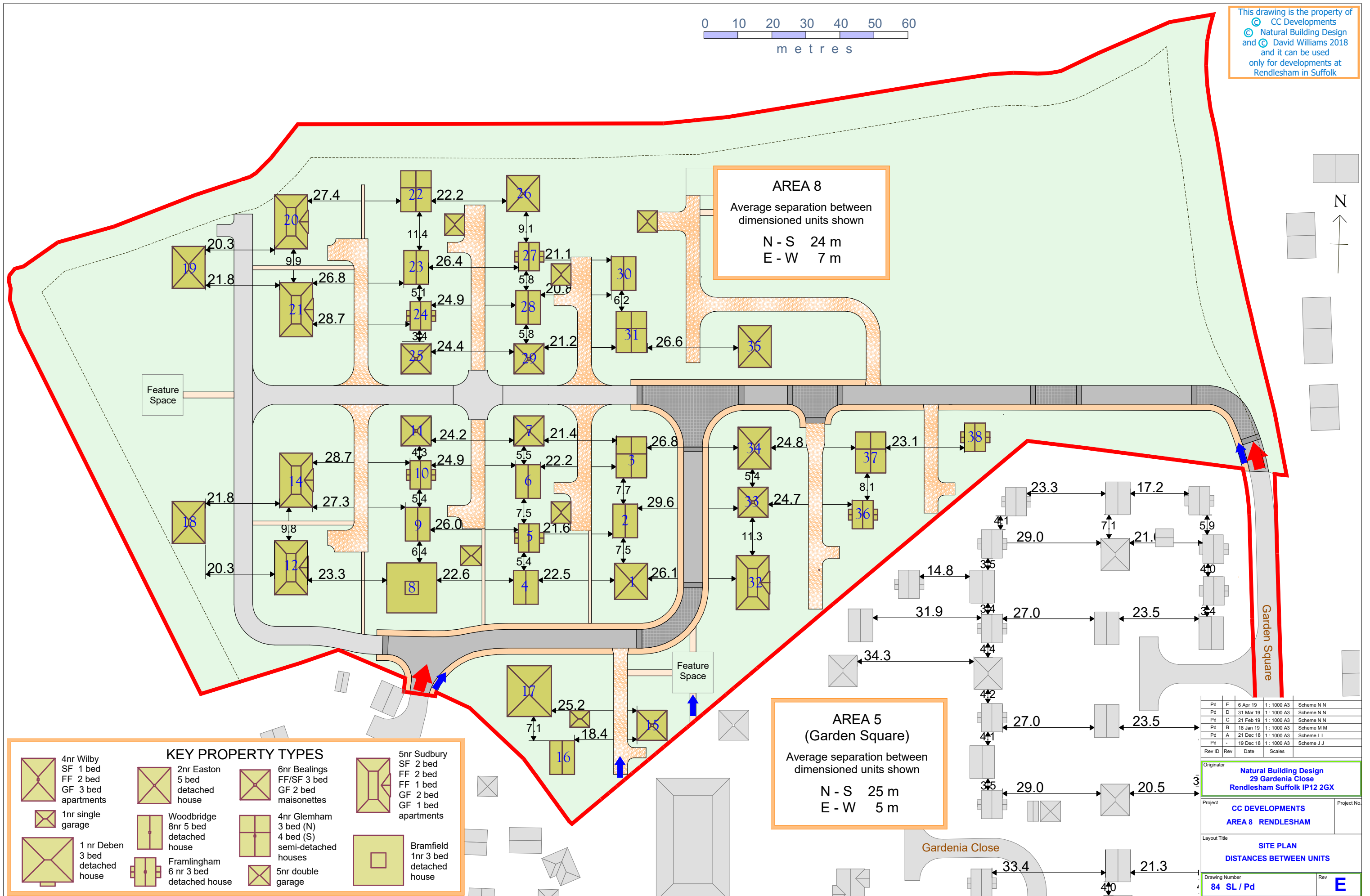
6. Affordable units comprise of social rent, intermediate rent and low cost home ownership and include both new build and acquisitions as measured by DCLG statistics; and affordable traveller pitches that comprise of pitches owned and managed by local authorities or Registered Social Landlords.

7. For illustration traveller pitches are assumed to be council tax level band A (and subject to the affordable homes premium).





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only for developments at
Rendlesham in Suffolk





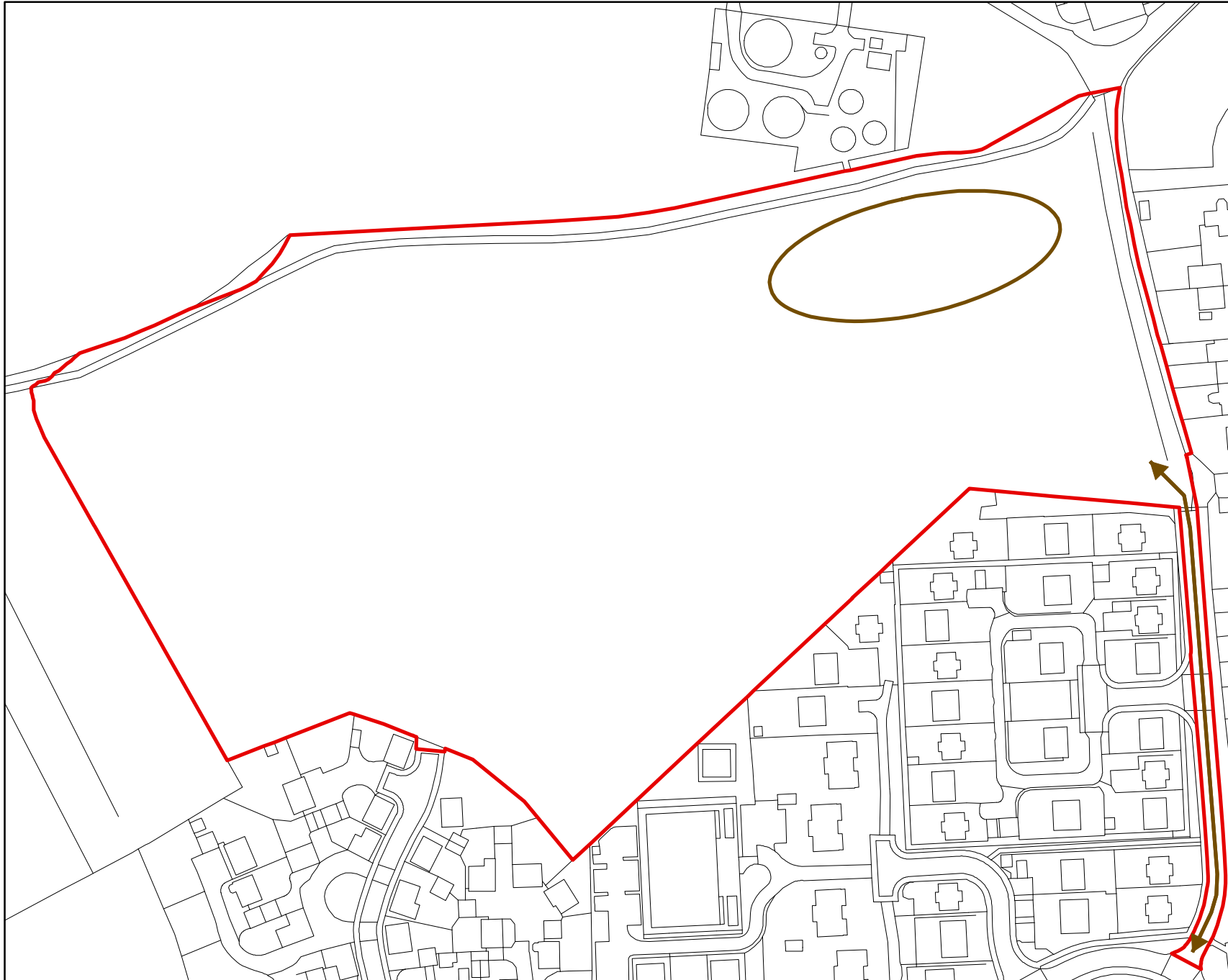
KEY SURFACES

- Minor access road - tarmac
- Raised platform junction - concrete pavers
- Shared surface road - tarmac / gravel surface
- Shared driveway - permeable clay pavers
- Footway - tarmac
- Footway - tar spray & shingle
- Footway, ramps & steps - sandstone slabs
- Parking - cellular paving & gravel
- Parking - cellular paving & grass
- Parking - cellular paving & grass
- Cycle storage access - tayspray & shingle
- Parking PTW - tarmac
- Bin collection points - tar spray & shingle




KEY BOUNDARIES

- Close-boarded timber fence 1800 high
- Close-boarded timber fence 750 high
- Plot boundary

Pw	C	6 Apr 19	1:250	A3	NN
Pw	B	4 Apr 19	1:250	A3	NN
Pw	A	31 Mar 19	1:250	A3	NN
Pw	-	21 Mar 19	1:250	A3	NN
Rev ID	Rev	Date	Scales		
Originator					
Natural Building Design 29 Gardenia Close Rendlesham Suffolk IP12 2GX					
Project				Project No.	
CC DEVELOPMENTS AREA 8 RENDLESHAM					
Layout Title					
SITE PLAN DETAIL TYPICAL PRIVATE DRIVE ACCESS & PARKING					
Drawing Number				Rev	
84 SP / Pw				C	



Key

-  Site
-  Construction Management Staging Area
-  Suggested Construction Vehicle Access Point

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N

0 25 50
Metres


Project: PS-2018-0645 Rendlesham

Drawing title: Construction Management Plan

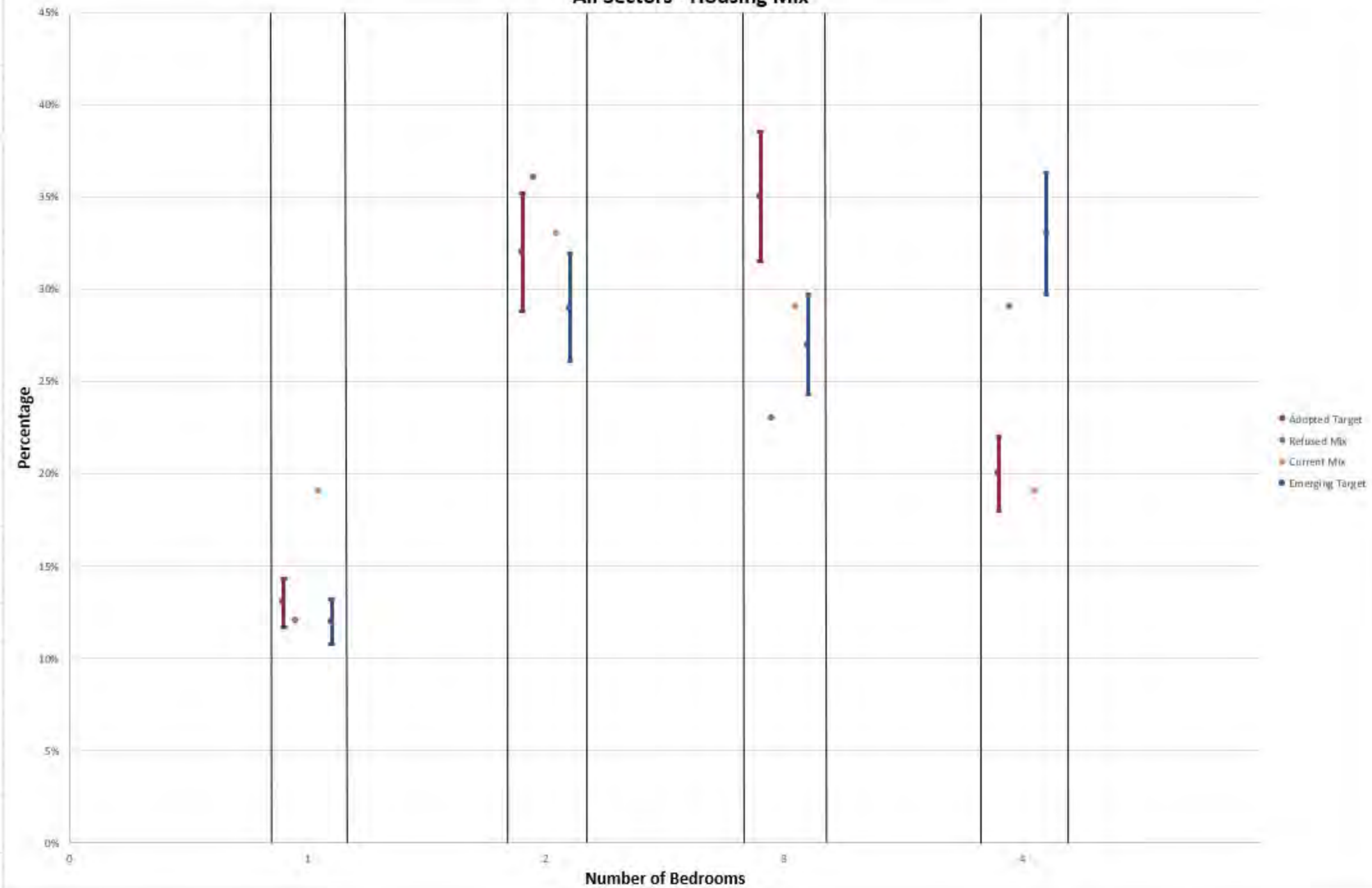
Drawing no: 2018/0645 | CMP1

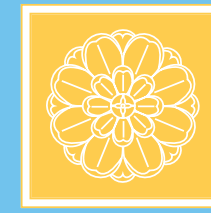
Rev.0 Date: March 2019

Scale: NTRS at A4 Drawn: TP



All Sectors - Housing Mix





Appendix 3 Email Correspondence with LPA

2

From: steven@parkerplanningservices.co.uk
Sent: 13 December 2018 17:27
To: Jane.Rodens@eastsoffolk.gov.uk
Subject: Rendlesham pre app DC/PREAPP/18/4778
Attachments: Site masterplan HH 05 12 18.pdf; Pre app meeting agenda notes 11_12_18.pdf

Importance: High

Good afternoon Jane,

Thank you for meeting with us with regard to the Rendlesham site. Attached is a set of meeting notes and action points for you to review and confirm please. It is a version of the agenda document I left with you with the notes section filled in. Items highlighted in yellow are action points for you or us.

With regard to our action points information on mix is below and I have attached a layout plan for comments. Can I suggest we send this plan backward and forwards a few times until issues such as boundaries and windows which you talked through at the meeting are generally resolved?

The pre-app deadline is 23rd December – in terms of getting info back from your housing colleague, reviewing the layout plan and writing the pre-app up can we assume you have sufficient time set aside in your workload for this please?

Mix

- CS mix requirement
3.50 As a general rule across the district the proportions shown in Table 3.6 should be sought in terms of house size. These have emerged from the Local Housing Assessment. The achievement of these targets will be monitored.

Table 3.6 Target proportions of house sizes

Bedrooms	1	2	3	4+
Open market housing	6%	32%	38%	22%
Affordable housing	43%	31%	16%	11%
All sectors	13%	32%	35%	20%

- Previous mix:

Bedrooms	1	2	3	4+
Open Market Housing	4.5%	24%	29%	16.5%
Affordable housing	32%	23%	12%	8%
All sectors	9%	27%	17%	22%

- Proposed mix:

Bedrooms	1	2	3	4+
Open Market Housing	5%	24%	29%	17%
Affordable housing	32%	23%	12%	8%
All sectors	10%	24%	26%	15%

- Emerging policy mix:

Table 5.1 Housing need by size, source: Strategic Housing Market Assessment Part 2 (May 2017)

Number of bedrooms	Percentage of District wide need
1	13%
2	29%
3	30%
4	28%



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk

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On behalf of Parker Planning Services Ltd, We would like to take this opportunity to say thank you and to wish you the very best for the New Year. May your Christmas go as planned!



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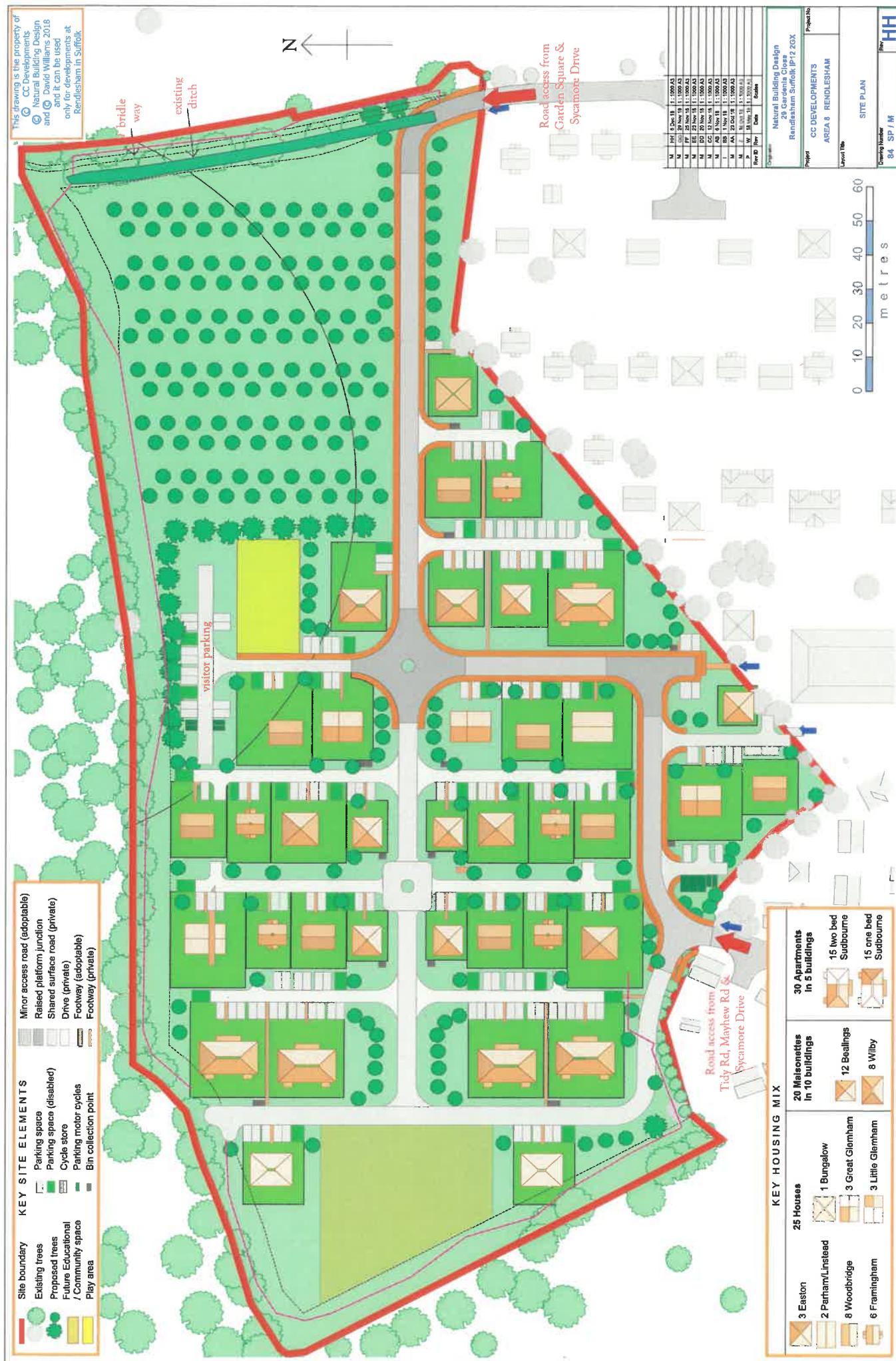
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Meeting of 11th December 2018. Attendees:

- Applicants CCD Ltd. Representatives. Anthony Hardy and John Renwick
- Parker Planning Ltd. Representatives. Jason Parker and Steven Bainbridge
- SCDC Representatives: Jane Rodens (JR)
- The Landscape Partnership Ltd. Mr. Nick Sibbett.

The purpose of this pre-application meeting is to discuss the planning matters related to the development of Site SSP12 in Rendlesham.

Agenda item	Notes	Lead
1 Ecology and HRA	JR to provide NS with details of the RAMS scheme which JR has said has been implemented in Suffolk Coastal. There were no other significant ecology matters.	NS
2 SSP12, Local Plan and housing numbers	JR acknowledged that SP2 is out of date and the NPPF Para 11 tilted balance applies. JR acknowledged that in respect of Para 11 the “most important” policies in this case are SP2, SP27 and SSP12 but added SP1 and SP1a. JR acknowledged that in the event that SSP12 is regarded by the LPA as a restrictive policy in terms of housing numbers then, by virtue of it being a derivative policy of SP2 and the Core Strategy, then it must be ‘infected’ by the out of date status of SP2 (and the higher housing requirement DPA figures in the Aldeburgh appeal decision) and be out of date itself and therefore of less weight – insofar as any ‘numbers restriction’ might be implied or applied. JR also acknowledged that if SSP12 is not ‘restrictive’ then the first 50 or so dwellings could be seen as compliant with the policy and the subsequent 25 or so as windfall and therefore be plan compliant that way. Either way JR was content that 75 dwellings was acceptable in principle having better understood why the ‘limiting factors’ referred to in the pre-ambule of SSP12 were either never limiting factors or were shown in the previous application to have been addressed therefore lifting the ‘restriction’.	SB
3. Homes, Residents, Mix and Affordable Housing	JR accepted that it is a developers prerogative to design houses to meet a specific and niche market demand if they choose and that this was not a planning matter but a matter for the market. JR accepted that having a ‘waiting list’ was not a planning matter and was no different to another developer selling ‘off plan’. JR accepted that there was no mechanism to somehow restrict the sale or occupancy of the dwellings to a specific group and that any attempt to categorise a group based on a set of shared principles and then claim they were not socially inclusive was problematic because residents (being from a wide range of backgrounds) might also have shared interests with other groups or organizations to which they should not be ‘categorised’. JR was content this was “no longer an issue”. The applicants were to provide further commentary on this in the planning application and beforehand if JR would like to receive it.	JP

	The applicants were to provide the latest housing mix info for feedback. JR is to obtain further guidance from her Housing colleague on their consultation response to the previous application and also to put it to them that if they push for different less viable tenures then on sound viability grounds this would probably reduce the overall affordable housing offer.	
4. Design	The applicants are to provide a copy of the latest layout plan and by exchange with JR review and reflect suggested minor changes to such things as boundaries, window positions etc.	AH/ JR

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 18 December 2018 14:40
To: Jane.Rodens@eastsuffolk.gov.uk
Subject: FW: Rendlesham pre app DC/PREAPP/18/4778

Importance: High

Good afternoon Jane,

Further to our recent pre-app meeting, email of 13th Dec and attempts to telephone you yesterday and today, we are mindful of the limited time before the pre-app deadline can we suggest dividing the pre-app advice on the following basis; the first part to be provided by the end of this week and the second part asap after the Christmas break and by way of an extension of time and additional design meeting if required.

Part 1 before 5pm Friday 21st Dec

- With reference to our pre-app letter, meeting notes and with senior officer oversight as necessary, provide feedback on the principle of development and the quantum of housing
- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

Part 2 after Christmas

- The provision of Affordable Housing with additional feedback from your Housing dept.
- Design – whether the development will create a safe and socially interactive environment.
- Design – overlooking, overshadowing, a dominating effect.
- Initial advice on planning contributions.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk

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On behalf of Parker Planning Services Ltd, We would like to take this opportunity to say thank you and to wish you the very best for the New Year. May your Christmas go as planned!



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Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 19 December 2018 11:20
To: Steven Bainbridge
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

3

Hello,

Sorry, for the delay in getting back to you and not being available yesterday.

Thank you for the meeting notes, I will add them to my own.

I have asked affordable housing the question about the additional information as detailed below and the meeting notes.

As detailed below, you have asked for information to be provided before and after the Christmas break. I cannot guarantee that I can provide the information before Christmas as tomorrow is planning committee, I have items to take.

I will try and provide the information that you have requested after Christmas, but I will let you know if I require any further information.

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505
Mobile: 07919303788

On 1 April 2019, we will become East Suffolk Council – a new 'super district' authority, serving the residents, businesses and communities of both Suffolk Coastal and Waveney. Importantly, it will be business as usual and the high quality services you receive from us will not be affected.

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Sent: 18 December 2018 14:40
To: Jane Rodens
Subject: FW: Rendlesham pre app DC/PREAPP/18/4778
Importance: High

Good afternoon Jane,

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 19 December 2018 11:31
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

4

Hello Jane,

Thanks for your email. The deadline for the pre-app response is this Sunday and assuming you're not in the office on Sunday do you want or need to extend it?

Clearly our preference is always to get pre-app advice within the 28 day period. However in this case we would prefer to receive bespoke advice even if that means it coming in after the deadline because we need to advise our clients in terms of returning to the previous refusal or other options going forwards.

In order for them to use the Christmas period for putting their thinking caps on a response before Friday on the principle/numbers and RAMS points as a minimum would be appreciated.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk

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your system.

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 10 January 2019 16:30
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

5

Importance: High

Good afternoon Jane,

Further to our correspondence below please can we pick this up again with a similar staged approach as requested before? I.e.:

Part 1 (asap)

- With reference to our pre-app letter, meeting notes and with senior officer oversight as necessary, provide feedback on the principle of development and the quantum of housing
- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

Part 2 (for the design elements we will very soon provide an amended revised draft to you)

- The provision of Affordable Housing with additional feedback from your Housing dept.
- Design – whether the development will create a safe and socially interactive environment.
- Design – overlooking, overshadowing, a dominating effect.
- Initial advice on planning contributions.

Regards,



Steven Bainbridge
Principal Planning Manager
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Phone: 01284 336121

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From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>
Sent: 19 December 2018 11:31

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 15 January 2019 13:51
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

6

Good afternoon Jane,

Just a quick reminder on the email below.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>
Sent: 10 January 2019 16:30
To: 'Jane Rodens' <Jane.Rodens@eastsuffolk.gov.uk>
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778
Importance: High

Good afternoon Jane,

Further to our correspondence below please can we pick this up again with a similar staged approach as requested before? I.e.:

Part 1 (asap)

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- Provide feedback on the mix of different bedroom properties.

Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 15 January 2019 14:03
To: Steven Bainbridge
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

7

Hello,

I am working on the information below, I am sorry for the delay in getting it to you, but I send out has to be cleared by a line manager as well.

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
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Mobile: 07919303788

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Sent: 15 January 2019 13:51
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

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Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 15 January 2019 14:05
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778



Thanks Jane, I will get the updated draft layout drawings over to you soon for the second half advice.



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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Sent: 15 January 2019 14:03
To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

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Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 22 January 2019 08:02
To: 'Jane Rodens'
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778



Hello again Jane,

We have the drawings and information ready for the 2nd half of the pre-app advice on detailed design matters. Do you have an eta for the first half covering the principal issues?

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 15 January 2019 14:03
To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

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Tel: (01394) 444505
Mobile: 07919303788

Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 22 January 2019 16:23
To: Steven Bainbridge
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

10

Hello,

Here is the councils response to the first stage of the pre-application.

A meeting was held with the applicant and agent for this pre-application to discuss the way forward and the previous planning permission decision.

It was agreed that advise would be given to the applicant on the following points before a final report is given on the final points of the pre-application.

- Provide feedback on the principle of development and the quantum of housing
- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

The quantum of development the principle of development

This proposal site is allocated in the Site allocation document SSP12 therefore the principle of development is considered to be established. However, the policy refers to approximately 50 dwellings on the site whereas this application refers to 75 dwellings.

As discussed within the meeting this level of development on the site may be acceptable where other material planning considerations are taken into to account and would not impact on the future and current occupants in and around the site.

There are to be further plans submitted as part of this pre-application to be able to consider the design of the site and other material planning considerations.

Inclusive and sustainable community

There is still a concern on the inclusivity of the site, this will depend on the additional information that is still to be submitted to the Planning Authority. Based upon the information available, the scheme appears to have limited physical or social connectivity to the existing wider local community across the settlement of Rendlesham, and the dwellings within the scheme would not be truly open market dwellings because their sale would be limited to a particular group of individuals.

Therefore based upon the information provided on the previous application and within the current submission, the proposal would be not be socially inclusive, and lack connectivity to the existing wider community, and thus not represent sustainable development as defined in local planning policy SP1 and the NPPF, because it would not "create and promote inclusive and sustainable communities".

I have received a number of phone calls, which suggest that potential residents of the site are being asked to pay money for the proposed homes, even though there is no planning permission for the proposed development. Whilst such a process lies outside the planning application process, it is of concern, and also suggests that the proposed dwellings are being marketed solely to those which have a connection/form part of the applicants group.

It has also been suggested that existing dwellings on the existing adjacent development have restrictions on them and can be sold too only those who form part of the group, and therefore in effect can not be sold to anyone who may be able to afford them. This suggests they are not truly open market.

This site is allocated in the Site Allocations document for open market housing with one-third affordable dwellings. Therefore in order to comply with the policy these requirements will need to be met.

Mix of different bedroom properties

Policy SP3 of the Core Strategy refers to the amount of house sizes in regards of bedrooms.

Bedrooms	1	2	3	4+
Open Market Housing	(6%) 4.5	(32%) 24	(39%) 29.25	(22%) 16.5
Affordable Housing	(43%) 32.25	(31%) 23.25	(16%) 12	(11%) 8.25
All sectors	(13%) 9.75	(32%) 24	(35%) 26.25	(20%) 15

This would be the required level of development on the site for 75 dwellings.

The adopted local plan policy (DM2) requires 33% of housing to be provided on this site to be affordable housing units comprising of 75% affordable rented and 25% low cost home ownership (normally shared ownership or shared equity). Current working practice is to ask for a 70% / 30% split. The affordable houses would need to be provided to a registered social landlord.

The draft local plan policy which is currently at the prior to submission stage, requires 33% affordable housing comprising of 50% affordable rented, 25% shared ownership and 25% discounted home ownership to reflect the findings of the published SHMA report.

This is a greenfield site and there are no other adverse planning constraints. Therefore it is expected the full policy requirement for affordable housing is provided on the site (i.e. one-third of the units need to be affordable to be transferred to a Registered Social Landlord). If you are proposing a scheme with less affordable dwellings than that required by planning policy, a viability report would need to be submitted to demonstrate, why the policy requirements cannot be fulfilled, and the level of affordable housing that can be located on the site.

Recreational Avoidance Mitigation Strategy

This is currently implemented by the Local Planning Authority, any development within 13km of the European Protected sites are to provided mitigation on the site or a payment towards mitigation off of the site.

The following link provides information on the councils process and methods of payment:

<http://www.eastsuffolk.gov.uk/planning/s106/habitat-mitigation/>

Community Infrastructure Levy (CIL)

As this proposal is for residential development, it would also be CIL Liable. Rendlesham is in the Medium Charging Zone. Further details on rates etc can be found online via <http://www.eastsuffolk.gov.uk/planning/community-infrastructure-levy/>

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505
Mobile: 07919303788

On 1 April 2019, we will become East Suffolk Council – a new ‘super district’ authority, serving the residents, businesses and communities of both Suffolk Coastal and Waveney. Importantly, it will be business as usual and the high quality services you receive from us will not be affected.

From: steven@parkerplanningservices.co.uk
Sent: 25 January 2019 18:00
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778
Attachments: Pre app meeting agenda notes 11_12_18.pdf; Pre-application Nett developable area 19 12 18.pdf; Pre-application Site masterplan revision MM 18 01 19.pdf; Mix of units Revision MM 18 01 19.pdf; Pre-application Site masterplan parking 19 01 19.pdf; Pre-application Street scene 20 12 18.pdf; Neighbourhood Watch Co-ordinator letter.pdf; Pre-application Separation distances 18 01 19.pdf

Good afternoon Jane,

Thank you for sending the first part pre-app advice over. We would like to clarify a few points from the first part advice and then below this you will see some discussion and further information on the second part. It would be easier for us to follow if your answers are inserted underneath the questions. We would be happy to discuss any of this on the telephone if anything is unclear.

First part

- *With reference to our pre-app letter, meeting notes and with senior officer oversight as necessary, provide feedback on the principle of development and the quantum of housing*
 - *Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community*
 - *Provide further information on the Recreational Avoidance Mitigation Strategy.*
 - *Provide feedback on the mix of different bedroom properties.*
1. In respect of your advice on the quantum of development please confirm (yes/no) the following adaptation of your sentence: "As discussed within the meeting this level of development on the site may be acceptable where other material planning considerations are taken into to account **in the planning balance** and would not impact on the future and current occupants in and around the site." This is important because at the meeting it was agreed that the tilted balance applies because SP2 is out of date. It would also be useful if you could set out some of the material considerations such as the 'additional' housing being windfall and/or an efficient use of land in a sustainable location etc. Also if it helps we discussed the following (which relates to the attached developable area plan) at the meeting and were expecting a specific response to it: The site is physically capable of accommodating up to 100 units, let alone 50 or 75. Please find attached a site plan showing the nett developable area. The gross area is 51,020 m2. The landscape buffer, the easements over the sewers, and the exclusion zone account for 18,664 m2. If we deduct this, this leave a nett developable area of 32,356 m2. If we use a reasonable density of 30 dwellings per hectare, this could accommodate up to 100 dwellings. The numbers were reduced from 75 units to 50 units because of the landscape buffer, the easements and the exclusion zone. Based on the evidence this is not justified and we are making comments to the local plan consultation to this effect. But please can you tell us whether there were any specific reasons why 75 units would not be an efficient use of land; land that has space for 100 units?
 2. Please give us some feedback on the point made at the meeting that the 'limiting factors' for Rendlesham referred to in the Site Allocations and Area Specific Policies DPD were either not limiting factors in the first place or have been shown not to be limiting factors through subsequent assessment.
 3. Please confirm we are correct in our understanding (yes/no) that Table 3.6 (mix) of the Core Strategy includes target figures, is referred to as a "general rule" and is not in policy SP3 but rather is supporting text to it. Please note in Revision MM we are closer still to the desired target mix in the local plan and would appreciate your thoughts on this.

4. The link you provided for RAMS information says repeatedly that the scheme “will be” required. But when? At the meeting Nick Sibbett said he had not seen that the scheme had actually been formally implemented yet. You said you would provide evidence that it had been implemented (an action point on the attached meeting note). It appears that RAMS is still not formally in place yet. Please confirm that you agree (yes/no) with your Babergh colleague’s statement on RAMS (below) and that therefore RAMS was not in place in 2018, is not in place yet, but probably will be by the time we submit:

From: Clare Dawson <Clare.Dawson@baberghmidsuffolk.gov.uk>

Sent: 10 January 2019 07:14

To: Nick Sibbett <nick.sibbett@tlp.uk.com>

Subject: RE: Latest position with RAMS for European sites

Hi Nick

The Suffolk Coast and Estuary RAMS has been through a final proof read and we are awaiting the final strategy as we speak.

Once we (all five Local Authorities) are in agreement that the Strategy is complete we will then be able to go through the process to get it endorsed.

Information regarding the RAMS will be up online as soon as I know the Strategy is ready – hopefully in the next month or two

If you have any further questions please do not hesitate to ask

Kind regards

Clare

Clare Dawson

Strategic Planning Policy Officer

5. You said you would get comments from the Housing Officer (an action point in the attached meeting note) – are these yet to be received? In his consultation response of 20 August 2018 Peter Goodrick, the Housing Development Manager, called for the Council to carry out its own viability report to check “concerns” about land values, build costs and open market values “*In my opinion a 2nd viability report should be undertaken on this site for the Council*”. In the absence of such a report or further feedback from him it is difficult for us to understand what was actually wrong with the previous viability report.
6. We see you remain concerned about inclusivity but there are no comments about the points we discussed at the meeting. Will we get this in the final formal response? Please explain what you mean by “limited physical connectivity” to the wider community – the houses are well linked via pavements to Rendlesham. In terms of your other points please note that the applicants have had a meeting with Clarke and Simpson and are proposing to use them for sales and marketing – of course this is a chicken and egg situation because the marketing can’t happen until there’s something to market. C&S will provide an internet presence on property portals such as Rightmove and On The Market, take enquiries, and then hand over to the in-house sales team. You will know they already work in this way with other property developers such as Hopkins Homes. It would be useful to hear from you that knowing this sort of info helps to allay your concerns about how the site will be marketed ‘post-consent’. But on a wider point of social connectivity, and this goes back to the discussions in the meeting, the peace palace and the health centre are open to *all* members of the public, whether or not they have any interest in meditation. The peace palace is promoting itself to public visitors for Bed and Breakfast stays, and to businesses and other organisations as a conference venue, and the health centre is actively offering consultations and treatments to the general public. <https://peacepalace.org.uk/bb> <https://peacepalace.org.uk/business> <https://ayurveda-rendlesham.co.uk/our-health-centre/>. As the applicants said at the meeting, the existing residents on Garden Square and Gardenia Close are active members of many ‘groups’ in and around Rendlesham and come from a wide variety of backgrounds.

- *The provision of Affordable Housing with additional feedback from your Housing dept.*
- *Design – whether the development will create a safe and socially interactive environment.*
- *Design – overlooking, overshadowing, a dominating effect.*
- *Initial advice on planning contributions.*

Please see attached layout plans, mix info, streetscenes, parking info and a copy of the neighbourhood watch response re the absence of crime locally.

You will appreciate that we maintain that these are matters of detailed design that could and should have been discussed during the process of the previous planning application but that is not a debate for now. Below is our response to the previous officer's report pages 18 to 20 in terms of design and security etc.

Continuity of design from Tidy Road and Mayhew Road. The overall intention is for the new development to be an extension of the existing development on Garden Square and Gardenia Close, i.e. to create one integrated development of 138 units rather than two differentiated developments of 75 units and 63 units. By and large we have used the existing and previously approved house designs, and we have extended the grid layout on Garden Square and Gardenia Close. Grid layouts are not uncommon in Rendlesham as you know from the Redwald Estate. The layout of Tidy Road and Mayhew Road is rather random and chaotic. The RNP is complimentary about the design and layout of GS and GC, but is critical of that of Mayhew Road and Tidy Road.

Small amenity space to rear. It is true that the traditional English approach is to have a small public garden to the front and a larger private garden to the rear. This is typical of suburban developments where houses tend to be much closer together, often in a row of semi-detached or a terrace. This is less of an issue in this development but also in other parts of Rendlesham where the former American housing is.

Front of plots dominated by car parking and hard standing. In the site layout for the earlier planning application we allowed for 186 parking spaces to meet SCC guidance. We thought this was excessive but it was to meet guidance. On 15 January we met with Ben Chester at CHA and we now understand that we can manage with 165 spaces. Please find attached the site master plan showing parking. This substantially reduces the amount of car parking and hard standing. We can also soften the impact of hard standing by planting shrubs and hedges in between groups of spaces, and by using eco-grids or grasscrete for some of the spaces.

No variation in heights, all two and three storey buildings. In the revised drawings there is more of a variation. We have introduced a bungalow at 4.8m. The actual heights vary from 4.8m to 11.1m.

High fences or brick walls to rear of properties. The report raises a concern that on the west side of the vertical north-south roads there will be a long line of fences and brick walls. This was not a problem on Garden Square or Gardenia Close so we thought SCDC would accept the precedent. We can soften this by staggering the boundaries, by having different heights for fences or walls, and especially by planting and landscaping. Please find attached a street scene which illustrates how this can be done.

Outdoor space associated with Peace Palace. In Revision MM we have moved this area to the west of the site, and instead of referring to it as *Outdoor space associated with the existing peace palace educational facility* we now refer to it as *Reserved for future educational/community building*. It is not uncommon for areas to be reserved in large sites for future developments, to be decided on their own merits at the appropriate time.

Play area too far away from the properties, less accessible on foot or bicycle, too close to the STW. In Revision MM we have brought this play area closer to the dwellings and away from the STW.

Visitor parking too far away from the dwellings. In Revision W we had 34 parking spaces in the north-east, of which 18 were for the properties, 12 for visitors, and 4 for PTW (powered two-wheelers). In Revision MM we have reduced this to 12 spaces for visitors and 4 for PTW.

Green space in *cordon sanitaire* left unmanaged and used as scrubland. The green space and gardens on Garden Square and Gardenia Close are well maintained by an estate management company. Residents pay an estate rent

charge to this company. We propose to use the same structure for the new development and are confident it will not be left unmanaged or used as scrubland. Residents will have a strong interest in maintaining it well.

Too many vertical north-south access roads. In Revision MM we have 7 instead of 9 as in the earlier Revision W.

Suffolk Constabulary concerns regarding safety, e.g. surveillance to deter crime, and permeability of the development. Overall it must be said that the grid layout provides good lines of sight. Garden Square and Gardenia Close are part of a Neighbourhood Watch Scheme and the co-ordinator has confirmed that the actual experience over a number of years is that there has been virtually nil incidence of crime, copy attached. The Suffolk Constabulary concerns are perhaps hypothetical, and are not supported by the actual evidence. Also some of the changes in Revision MM have reduced the 'permeability' of the site, for example we have omitted the trim trail around the back or sides of properties. We have labelled the trim trail as an ecological wildlife corridor. We have now reduced or removed the trim trail, and instead refer to it as an ecological wildlife corridor. There will be a perimeter fence along the western and northern boundaries. We have removed the pond area.

Overlooking, overshadowing, dominating effect.

Overlooking Plot 20. In Revision MM we have removed the tall building with a balcony on Plot 20.

Overlooking generally. Please find a site masterplan with the separation distances for the new development and for the existing development on Garden Square and Gardenia Close. The distances are better compared to Garden Square and Gardenia Close, and also better compared to Tidy Road and Mayhew Road.

Overlooking Plot 15. We have three maisonette blocks around the peace palace, and symmetry encourages us to build a 4th block to complete the pattern of around the peace palace. The separation distance is the same between Plot 15 and 5-6 Peace Palace Gardens as it is between 1-2 PPG and 3-4 PPG. There are trees between Plot 15 and 5-6 PPG which will provide privacy.

Overlooking between flank elevations (north-south). Generally the house designs tend to have very few windows on the north elevations. Also the separation distances between flank elevations on the new development are better compared to the existing and previously acceptable GS and GC and to Tidy Road and Mayhew Road, see plan attached.

Overshadowing between flank elevations. We have staggered some of the buildings to respond to this point.

Trim trail - noise and overlooking. In Revision MM we have removed sections of the trim trail and maintained the eastern stretch which also becomes the bridleway.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



Norfolk Office:

Parker Planning Services Ltd, Orchard House, Hall Lane, East Tuddenham, NR20 3LR
Phone: 01603 516319

Suffolk Office:

Parker Planning Services Ltd, Northgate Business Centre, 10 Northgate Street, Bury St Edmunds, Suffolk, IP33 1HQ
Phone: 01284 336348

Meeting of 11th December 2018. Attendees:

- Applicants CCD Ltd. Representatives. Anthony Hardy and John Renwick
- Parker Planning Ltd. Representatives. Jason Parker and Steven Bainbridge
- SCDC Representatives: Jane Rodens (JR)
- The Landscape Partnership Ltd. Mr. Nick Sibbett.

The purpose of this pre-application meeting is to discuss the planning matters related to the development of Site SSP12 in Rendlesham.

Agenda item	Notes	Lead
1 Ecology and HRA	JR to provide NS with details of the RAMS scheme which JR has said has been implemented in Suffolk Coastal. There were no other significant ecology matters.	NS
2 SSP12, Local Plan and housing numbers	JR acknowledged that SP2 is out of date and the NPPF Para 11 tilted balance applies. JR acknowledged that in respect of Para 11 the “most important” policies in this case are SP2, SP27 and SSP12 but added SP1 and SP1a. JR acknowledged that in the event that SSP12 is regarded by the LPA as a restrictive policy in terms of housing numbers then, by virtue of it being a derivative policy of SP2 and the Core Strategy, then it must be ‘infected’ by the out of date status of SP2 (and the higher housing requirement DPA figures in the Aldeburgh appeal decision) and be out of date itself and therefore of less weight – insofar as any ‘numbers restriction’ might be implied or applied. JR also acknowledged that if SSP12 is not ‘restrictive’ then the first 50 or so dwellings could be seen as compliant with the policy and the subsequent 25 or so as windfall and therefore be plan compliant that way. Either way JR was content that 75 dwellings was acceptable in principle having better understood why the ‘limiting factors’ referred to in the pre-ambule of SSP12 were either never limiting factors or were shown in the previous application to have been addressed therefore lifting the ‘restriction’.	SB
3. Homes, Residents, Mix and Affordable Housing	JR accepted that it is a developers prerogative to design houses to meet a specific and niche market demand if they choose and that this was not a planning matter but a matter for the market. JR accepted that having a ‘waiting list’ was not a planning matter and was no different to another developer selling ‘off plan’. JR accepted that there was no mechanism to somehow restrict the sale or occupancy of the dwellings to a specific group and that any attempt to categorise a group based on a set of shared principles and then claim they were not socially inclusive was problematic because residents (being from a wide range of backgrounds) might also have shared interests with other groups or organizations to which they should not be ‘categorised’. JR was content this was “no longer an issue”. The applicants were to provide further commentary on this in the planning application and beforehand if JR would like to receive it.	JP

	The applicants were to provide the latest housing mix info for feedback. JR is to obtain further guidance from her Housing colleague on their consultation response to the previous application and also to put it to them that if they push for different less viable tenures then on sound viability grounds this would probably reduce the overall affordable housing offer.	
4. Design	The applicants are to provide a copy of the latest layout plan and by exchange with JR review and reflect suggested minor changes to such things as boundaries, window positions etc.	AH/ JR



This drawing is the property of
 CC Developments
 Natural Building Design
 and GARDEN VILLAINS 2018
 and it is to be used
 only for developments at
 Rendlesham in Suffolk



- KEY SITE ELEMENTS**
- Site boundary
 - Existing trees
 - Proposed trees
 - Play area
 - Reserved for future educational / community building
 - Parking space
 - Parking (disabled)
 - Parking (visitors)
 - Cycle store
 - Parking motor cycles
 - Bn collection point
 - Minor access road (adoptable)
 - Raised platform junction
 - Speed bump
 - Shared surface road (private)
 - Drive (private)
 - Perimeter green space
 - Footway (adoptable)
 - Footway (private)
 - Pumping station
 - Swales (new)
 - Swales (existing)

KEY MIX

- 25 Houses**
 Ea Easton (2nr)
 Pa Parham (1nr)
 Ln Linstead (1nr)
 Wd Woodbridge (6nr)
 Fr Framlingham (6nr)
 Bh Bramham (1nr)
 Gh Glemham (6nr)
 in three buildings
- 20 Maisonettes**
 In ten buildings
 Wb Wilby (6nr)
 Be Baillings (12nr)
- 30 Apartments**
 in five buildings
 Sb Sudbourne (30nr)

P	Area	15 Jan 18	11 1000 A3
P	1	21 Dec 18	11 1000 A3
P	2	21 Dec 18	11 1000 A3
P	3	21 Dec 18	11 1000 A3
P	4	21 Dec 18	11 1000 A3
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P	7	21 Dec 18	11 1000 A3
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Natural Building Design
 29 Gardenia Close
 Rendlesham Suffolk IP12 2GX

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 AREA 8 RENDLESHAM

	1 bed	2 bed	3 bed	4+ bed	Total
Target					
Open Market	5	24	29	17	75
Affordable	32	23	12	8	75
All sectors	10	24	26	15	75
June 2018	9	27	17	22	75
January 2019	15	21	26	13	75
Breakdown					
Easton				2	2
Woodbridge				8	8
Framlingham			6		6
Glemham			3	3	6
Wilby			8		8
Bealings		6	6		12
Sudbourne	15	15			30
Custom			3		3
Totals	15	21	26	13	75



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Carole Wilson
Neighbourhood Watch Coordinator
10 Garden Square
Rendlesham
Suffolk IP12 2GW

Planning Application: DC/18/2374/FUL

Dear Ms Rodens

I have lived in Garden Square since 2006 and have been Neighbourhood Watch Coordinator for a scheme, started in 2014, that covers Garden Square and Gardenia Close.

Garden Square and Gardenia Close are designed in exactly the same way that the proposed development is, i.e. all the properties are east facing.

As this layout does not have any of the problems that Suffolk Constabulary's Phil Kemp has outlined, I feel it necessary to respond from an experiential rather than hypothetical stand point. In all the years I have lived in Garden Square, the only incidents of theft that have occurred have done so because people left their shed or vehicle unlocked overnight. These incidents have been rare and, interestingly, have only ever happened when several other properties, in village roads that are not designed for the houses to be east facing, have had exactly the same experience – overnight thefts from unlocked cars, garages or sheds. There has never been a burglary or attempted burglary in any of the flats or houses in Garden Square or Gardenia Close.

The lines of sight are very good, for example: from various windows in my house, I can see the entire entrance to Gardenia Close, the road in front of my house that leads to other houses in the square, the front doors of all the blocks of flats, the front gardens of at least 8 properties and the back gardens of at least 7 properties.

We have a centrally placed garden that has features in it that include arbour seats and fountains; the garden has often been visited by people, including youngsters, who do not live in Garden Square or Gardenia Close, we have had no incidents of theft, graffiti or anti-social behaviour...

And, because we have a Neighbourhood Watch Scheme, I can immediately email everyone who lives here to advise them if there's a potential concern. The developer has already asked if I would be willing to include the new development in our existing scheme and I have responded positively to this.

As well as being our Neighbourhood Watch Coordinator, I have also been a Parish Councillor in Rendlesham, in the 12 years I have lived here, there has been **one** incident of graffiti involving a teenager – inappropriate language was written on the arm of a bench in Walnut Tree Square – we washed it off. The only other incident of graffiti was to the village sign and, because of the type of slogan used, this was most likely done by an adult with a grudge than a teenager. Even the pavilion that stood empty in Rendlesham's Jubilee Park for 7 years, whilst solicitors wrangled over restricted covenants, suffered from no graffiti or any other kind of malicious attack. This is still holds true today now that the Parish Council own the park and the pavilion.

As a Parish Councillor, I was on the committee that produced The Rendlesham Neighbourhood Plan where it was noted from residents that they valued the existing cycle paths and wanted new developments to include them along with facilities such as a trim trail. I was also chair of the Rendlesham Youth Group and have liaised closely with both youth and their leaders. Whilst

Rendlesham has a disproportionate number of under 25 year olds, I would wish to state that the gathering of youths is not commensurate with anti-social behaviour. Likewise, whilst Rendlesham would have a disproportionate number of east facing houses if planning permission is granted for this new development, this is not commensurate with the provision of an opportunity for anti-social behaviour to occur.

Whilst I understand that some areas of the world may have need to the use of the phrase 'defensible space of a neighbourhood' it is of great concern to me that this phrase feels highly inappropriate in this particular instance and I should wish to bring some balance to the perception that a development of east facing houses is in some way likely to increase crime where the evidence of our experience is quite the reverse.

Thank you,

Carole Wilson

Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 29 January 2019 14:11
To: Steven Bainbridge
Cc: planning
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

12

Hello,

Thank you for your email, I will put in the information below.

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505

On 1 April 2019, we will become East Suffolk Council – a new ‘super district’ authority, serving the residents, businesses and communities of both Suffolk Coastal and Waveney. Importantly, it will be business as usual and the high quality services you receive from us will not be affected.

www.eastsuffolk.gov.uk



From: steven@parkerplanningservices.co.uk [mailto:steven@parkerplanningservices.co.uk]
Sent: 25 January 2019 18:00
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Good afternoon Jane,

Thank you for sending the first part pre-app advice over. We would like to clarify a few points from the first part advice and then below this you will see some discussion and further information on the second part. It would be easier for us to follow if your answers are inserted underneath the questions. We would be happy to discuss any of this on the telephone if anything is unclear.

First part

- With reference to our pre-app letter, meeting notes and with senior officer oversight as necessary, provide feedback on the principle of development and the quantum of housing
- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

1. In respect of your advice on the quantum of development please confirm (yes/no) the following adaptation of your sentence: "As discussed within the meeting this level of development on the site may be acceptable where other material planning considerations are taken into account **in the planning balance** and would not impact on the future and current occupants in and around the site." This is important because at the meeting it was agreed that the tilted balance applies because SP2 is out of date. It would also be useful if you could set out some of the material considerations such as the 'additional' housing being windfall and/or an efficient use of land in a sustainable location etc. Also if it helps we discussed the following (which relates to the attached developable area plan) at the meeting and were expecting a specific response to it: The site is physically capable of accommodating up to 100 units, let alone 50 or 75. Please find attached a site plan showing the nett developable area. The gross area is 51,020 m2. The landscape buffer, the easements over the sewers, and the exclusion zone account for 18,664 m2. If we deduct this, this leaves a nett developable area of 32,356 m2. If we use a reasonable density of 30 dwellings per hectare, this could accommodate up to 100 dwellings. The numbers were reduced from 75 units to 50 units because of the landscape buffer, the easements and the exclusion zone. Based on the evidence this is not justified and we are making comments to the local plan consultation to this effect. But please can you tell us whether there were any specific reasons why 75 units would not be an efficient use of land; land that has space for 100 units?

The planning balance refers to the material planning considerations, if 75 dwellings cannot fit in because there is overlooking or amenity issues, or the design of the layout is unacceptable, then the amount of dwellings would need to be reduced to overcome these problems. More dwellings may be acceptable if it can be proven that there is no adverse effect on the future and current residents of the site.

As you state above there is still a requirement for the provision of the sewerage network, treatment plant, landscape buffer, which are all requirements of the policy, this then reduces the amount of dwellings further. This may have been a representation at the Local Plan and the new local plan but this is the policy as it currently stands, if the policy changes in the new local plan then this would be a different matter. However, at this stage the New Local Plan policy for the site SCLP12.62 is the same as the current policy. Therefore still keeping the amount of dwellings at approximately 50 dwellings, subject to the above.

2. Please give us some feedback on the point made at the meeting that the 'limiting factors' for Rendlesham referred to in the Site Allocations and Area Specific Policies DPD were either not limiting factors in the first place or have been shown not to be limiting factors through subsequent assessment.

I am assuming that the limiting factors are the need for sewerage network, treatment plant, landscape buffer. These have come about through the development of the policy and are criteria in the policy and therefore should be applied to the application.

3. Please confirm we are correct in our understanding (yes/no) that Table 3.6 (mix) of the Core Strategy includes target figures, is referred to as a "general rule" and is not in policy SP3 but rather is supporting text to it. Please note in Revision MM we are closer still to the desired target mix in the local plan and would appreciate your thoughts on this.

These are target figures and developments will be looked upon favourably where they meet and are closest to it.

4. The link you provided for RAMS information says repeatedly that the scheme "will be" required. But when? At the meeting Nick Sibbett said he had not seen that the scheme had actually been formally implemented yet. You said you would provide evidence that it had been implemented (an action point on the attached meeting note). It appears that RAMS is still not formally in place yet. Please confirm that you agree (yes/no) with your Babergh colleague's statement on RAMS (below) and that therefore RAMS was not in place in 2018, is not in place yet, but probably will be by the time we submit:

From: Clare Dawson <Clare.Dawson@baberghmidsuffolk.gov.uk>

Sent: 10 January 2019 07:14

To: Nick Sibbett <nick.sibbett@tlf.uk.com>

Subject: RE: Latest position with RAMS for European sites

Hi Nick

The Suffolk Coast and Estuary RAMS has been through a final proof read and we are awaiting the final strategy as we speak.

Once we (all five Local Authorities) are in agreement that the Strategy is complete we will then be able to go through the process to get it endorsed.

Information regarding the RAMS will be up online as soon as I know the Strategy is ready – hopefully in the next month or two

If you have any further questions please do not hesitate to ask

Kind regards

Clare

Clare Dawson

Strategic Planning Policy Officer

I cannot comment on the above email, but I have been informed, and have been applying RAMS to all applications that refer to development of new dwellings and holiday lets, by the Team Leaders and the Head of Planning that are to apply this to all applications.

5. You said you would get comments from the Housing Officer (an action point in the attached meeting note) – are these yet to be received? In his consultation response of 20 August 2018 Peter Goodrick, the Housing Development Manager, called for the Council to carry out its own viability report to check “concerns” about land values, build costs and open market values “In my opinion a 2nd viability report should be undertaken on this site for the Council”. In the absence of such a report or further feedback from him it is difficult for us to understand what was actually wrong with the previous viability report.

I did and they are put into the pre-application sent to you, it is recommended that a new viability report is submitted, there are questions raised over the figures and the costs of the site as this is a Green field site, if you cannot meet the requirements for affordable dwellings then this would need to be further justified for the site.

6. We see you remain concerned about inclusivity but there are no comments about the points we discussed at the meeting. Will we get this in the final formal response? Please explain what you mean by “limited physical connectivity” to the wider community – the houses are well linked via pavements to Rendlesham. In terms of your other points please note that the applicants have had a meeting with Clarke and Simpson and are proposing to use them for sales and marketing – of course this is a chicken and egg situation because the marketing can’t happen until there’s something to market. C&S will provide an internet presence on property portals such as Rightmove and On The Market, take enquiries, and then hand over to the in-house sales team. You will know they already work in this way with other property developers such as Hopkins Homes. It would be useful to hear from you that knowing this sort of info helps to allay your concerns about how the site will be marketed ‘post-consent’. But on a wider point of social connectivity, and this goes back to the discussions in the meeting, the peace palace and the health centre are open to *all* members of the public, whether or not they have any interest in meditation. The peace palace is promoting itself to public visitors for Bed and Breakfast stays, and to businesses and other organisations as a conference venue, and the health centre is actively offering consultations and treatments to the general public. <https://peacepalace.org.uk/bb> <https://peacepalace.org.uk/business> <https://ayurveda-rendlesham.co.uk/our-health-centre/>. As the applicants said at the meeting, the existing residents on Garden Square and Gardenia Close are active members of many ‘groups’ in and around Rendlesham and come from a wide variety of backgrounds.

That use is not for dwelling it is an education centre, I don’t know how this would be applicable to the dwellings on this site? Also is the ownership different? as the developer is not the same as this application?

Second part – this will be looked at and come back to you

- The provision of Affordable Housing with additional feedback from your Housing dept.
- Design – whether the development will create a safe and socially interactive environment.
- Design – overlooking, overshadowing, a dominating effect.
- Initial advice on planning contributions.

Please see attached layout plans, mix info, streetscenes, parking info and a copy of the neighbourhood watch response re the absence of crime locally.

You will appreciate that we maintain that these are matters of detailed design that could and should have been discussed during the process of the previous planning application but that is not a debate for now. Below is our response to the previous officer's report pages 18 to 20 in terms of design and security etc.

Continuity of design from Tidy Road and Mayhew Road. The overall intention is for the new development to be an extension of the existing development on Garden Square and Gardenia Close, i.e. to create one integrated development of 138 units rather than two differentiated developments of 75 units and 63 units. By and large we have used the existing and previously approved house designs, and we have extended the grid layout on Garden Square and Gardenia Close. Grid layouts are not uncommon in Rendlesham as you know from the Redwald Estate. The layout of Tidy Road and Mayhew Road is rather random and chaotic. The RNP is complimentary about the design and layout of GS and GC, but is critical of that of Mayhew Road and Tidy Road.

Small amenity space to rear. It is true that the traditional English approach is to have a small public garden to the front and a larger private garden to the rear. This is typical of suburban developments where houses tend to be much closer together, often in a row of semi-detached or a terrace. This is less of an issue in this development but also in other parts of Rendlesham where the former American housing is.

Front of plots dominated by car parking and hard standing. In the site layout for the earlier planning application we allowed for 186 parking spaces to meet SCC guidance. We thought this was excessive but it was to meet guidance. On 15 January we met with Ben Chester at CHA and we now understand that we can manage with 165 spaces. Please find attached the site master plan showing parking. This substantially reduces the amount of car parking and hard standing. We can also soften the impact of hard standing by planting shrubs and hedges in between groups of spaces, and by using eco-grids or grasscrete for some of the spaces.

No variation in heights, all two and three storey buildings. In the revised drawings there is more of a variation. We have introduced a bungalow at 4.8m. The actual heights vary from 4.8m to 11.1m.

High fences or brick walls to rear of properties. The report raises a concern that on the west side of the vertical north-south roads there will be a long line of fences and brick walls. This was not a problem on Garden Square or Gardenia Close so we thought SCDC would accept the precedent. We can soften this by staggering the boundaries, by having different heights for fences or walls, and especially by planting and landscaping. Please find attached a street scene which illustrates how this can be done.

Outdoor space associated with Peace Palace. In Revision MM we have moved this area to the west of the site, and instead of referring to it as *Outdoor space associated with the existing peace palace educational facility* we now refer to it as *Reserved for future educational/community building*. It is not uncommon for areas to be reserved in large sites for future developments, to be decided on their own merits at the appropriate time.

Play area too far away from the properties, less accessible on foot or bicycle, too close to the STW. In Revision MM we have brought this play area closer to the dwellings and away from the STW.

Visitor parking too far away from the dwellings. In Revision W we had 34 parking spaces in the north-east, of which 18 were for the properties, 12 for visitors, and 4 for PTW (powered two-wheelers). In Revision MM we have reduced this to 12 spaces for visitors and 4 for PTW.

Green space in *cordon sanitaire* left unmanaged and used as scrubland. The green space and gardens on Garden Square and Gardenia Close are well maintained by an estate management company. Residents pay an estate rent charge to this company. We propose to use the same structure for the new development and are confident it will not be left unmanaged or used as scrubland. Residents will have a strong interest in maintaining it well.

Too many vertical north-south access roads. In Revision MM we have 7 instead of 9 as in the earlier Revision W.

Suffolk Constabulary concerns regarding safety, e.g. surveillance to deter crime, and permeability of the development. Overall it must be said that the grid layout provides good lines of sight. Garden Square and Gardenia

Close are part of a Neighbourhood Watch Scheme and the co-ordinator has confirmed that the actual experience over a number of years is that there has been virtually nil incidence of crime, copy attached. The Suffolk Constabulary concerns are perhaps hypothetical, and are not supported by the actual evidence. Also some of the changes in Revision MM have reduced the 'permeability' of the site, for example we have omitted the trim trail around the back or sides of properties. We have labelled the trim trail as an ecological wildlife corridor. We have now reduced or removed the trim trail, and instead refer to it as an ecological wildlife corridor. There will be a perimeter fence along the western and northern boundaries. We have removed the pond area.

Overlooking, overshadowing, dominating effect.

Overlooking Plot 20. In Revision MM we have removed the tall building with a balcony on Plot 20.

Overlooking generally. Please find a site masterplan with the separation distances for the new development and for the existing development on Garden Square and Gardenia Close. The distances are better compared to Garden Square and Gardenia Close, and also better compared to Tidy Road and Mayhew Road.

Overlooking Plot 15. We have three maisonette blocks around the peace palace, and symmetry encourages us to build a 4th block to complete the pattern of around the peace palace. The separation distance is the same between Plot 15 and 5-6 Peace Palace Gardens as it is between 1-2 PPG and 3-4 PPG. There are trees between Plot 15 and 5-6 PPG which will provide privacy.

Overlooking between flank elevations (north-south). Generally the house designs tend to have very few windows on the north elevations. Also the separation distances between flank elevations on the new development are better compared to the existing and previously acceptable GS and GC and to Tidy Road and Mayhew Road, see plan attached.

Overshadowing between flank elevations. We have staggered some of the buildings to respond to this point.

Trim trail - noise and overlooking. In Revision MM we have removed sections of the trim trail and maintained the eastern stretch which also becomes the bridleway.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



Norfolk Office:

Parker Planning Services Ltd, Orchard House, Hall Lane, East Tuddenham, NR20 3LR
Phone: 01603 516319

Suffolk Office:

Parker Planning Services Ltd, Northgate Business Centre, 10 Northgate Street, Bury St Edmunds, Suffolk, IP33 1HQ
Phone: 01284 336348

Essex Office:

Parker Planning Services Ltd, Moulsham Mill, Parkway, Chelmsford, Essex, CM2 7PX
Phone: 01245 934184

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From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 22 January 2019 16:23
To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

Here is the councils response to the first stage of the pre-application.

A meeting was held with the applicant and agent for this pre-application to discuss the way forward and the previous planning permission decision.

It was agreed that advise would be given to the applicant on the following points before a final report is given on the final points of the pre-application.

- Provide feedback on the principle of development and the quantum of housing
- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

The quantum of development the principle of development

This proposal site is allocated in the Site allocation document SSP12 therefore the principle of development is considered to be established. However, the policy refers to approximately 50 dwellings on the site whereas this application refers to 75 dwellings.

As discussed within the meeting this level of development on the site may be acceptable where other material planning considerations are taken into account and would not impact on the future and current occupants in and around the site.

There are to be further plans submitted as part of this pre-application to be able to consider the design of the site and other material planning considerations.

Inclusive and sustainable community

There is still a concern on the inclusivity of the site, this will depend on the additional information that is still to be submitted to the Planning Authority. Based upon the information available, the scheme appears to have limited physical or social connectivity to the existing wider local community across the settlement of Rendlesham, and the dwellings within the scheme would not be truly open market dwellings because their sale would be limited to a particular group of individuals.

Therefore based upon the information provided on the previous application and within the current submission, the proposal would be not be socially inclusive, and lack connectivity to the existing wider community, and thus not represent sustainable development as defined in local planning policy SP1 and the NPPF, because it would not "create and promote inclusive and sustainable communities".

I have received a number of phone calls, which suggest that potential residents of the site are being asked to pay money for the proposed homes, even though there is no planning permission for the proposed development. Whilst such a process lies outside the planning application process, it is of concern, and also suggests that the proposed dwellings are being marketed solely to those which have a connection/form part of the applicants group.

It has also been suggested that existing dwellings on the existing adjacent development have restrictions on them and can be sold too only those who form part of the group, and therefore in effect can not be sold to anyone who may be able to afford them. This suggests they are not truly open market.

This site is allocated in the Site Allocations document for open market housing with one-third affordable dwellings. Therefore in order to comply with the policy these requirements will need to be met.

Mix of different bedroom properties

Policy SP3 of the Core Strategy refers to the amount of house sizes in regards of bedrooms.

Bedrooms	1	2	3	4+
Open Market Housing	(6%) 4.5	(32%) 24	(39%) 29.25	(22%) 16.5
Affordable Housing	(43%) 32.25	(31%) 23.25	(16%) 12	(11%) 8.25
All sectors	(13%) 9.75	(32%) 24	(35%) 26.25	(20%) 15

This would be the required level of development on the site for 75 dwellings.

The adopted local plan policy (DM2) requires 33% of housing to be provided on this site to be affordable housing units comprising of 75% affordable rented and 25% low cost home ownership (normally shared ownership or shared equity). Current working practice is to ask for a 70% / 30% split. The affordable houses would need to be provided to a registered social landlord.

The draft local plan policy which is currently at the prior to submission stage, requires 33% affordable housing comprising of 50% affordable rented, 25% shared ownership and 25% discounted home ownership to reflect the findings of the published SHMA report.

This is a greenfield site and there are no other adverse planning constraints. Therefore it is expected the full policy requirement for affordable housing is provided on the site (i.e. one-third of the units need to be affordable to be transferred to a Registered Social Landlord). If you are proposing a scheme with less affordable dwellings than that required by planning policy, a viability report would need to be submitted to demonstrate, why the policy requirements cannot be fulfilled, and the level of affordable housing that can be located on the site.

Recreational Avoidance Mitigation Strategy

This is currently implemented by the Local Planning Authority, any development within 13km of the European Protected sites are to provided mitigation on the site or a payment towards mitigation off of the site.

The following link provides information on the councils process and methods of payment:

<http://www.eastsuffolk.gov.uk/planning/s106/habitat-mitigation/>

Community Infrastructure Levy (CIL)

As this proposal is for residential development, it would also be CIL Liable. Rendlesham is in the Medium Charging Zone. Further details on rates etc can be found online via <http://www.eastsuffolk.gov.uk/planning/community-infrastructure-levy/>

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505
Mobile: 07919303788

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From: steven@parkerplanningservices.co.uk [<mailto:steven@parkerplanningservices.co.uk>]
Sent: 22 January 2019 08:02
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello again Jane,

We have the drawings and information ready for the 2nd half of the pre-app advice on detailed design matters. Do you have an eta for the first half covering the principal issues?

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



Norfolk Office:

Parker Planning Services Ltd, Orchard House, Hall Lane, East Tuddenham, NR20 3LR
Phone: 01603 516319

Suffolk Office:

Parker Planning Services Ltd, Northgate Business Centre, 10 Northgate Street, Bury St Edmunds, Suffolk, IP33 1HQ
Phone: 01284 336348

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Phone: 01245 934184

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From: Jane Rodens <Jane.Rodens@eastssuffolk.gov.uk>
Sent: 15 January 2019 14:03
To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

I am working on the information below, I am sorry for the delay in getting it to you, but I send out has to be cleared by a line manager as well.

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning

Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505
Mobile: 07919303788

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From: steven@parkerplanningservices.co.uk [<mailto:steven@parkerplanningservices.co.uk>]
Sent: 15 January 2019 13:51
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Good afternoon Jane,

Just a quick reminder on the email below.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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Parker Planning Services Ltd, Orchard House, Hall Lane, East Tuddenham, NR20 3LR
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From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>
Sent: 10 January 2019 16:30
To: 'Jane Rodens' <Jane.Rodens@eastsuffolk.gov.uk>
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778
Importance: High

Good afternoon Jane,

Further to our correspondence below please can we pick this up again with a similar staged approach as requested before? I.e.:

Part 1 (asap)

- With reference to our pre-app letter, meeting notes and with senior officer oversight as necessary, provide feedback on the principle of development and the quantum of housing
- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

Part 2 (for the design elements we will very soon provide an amended revised draft to you)

- The provision of Affordable Housing with additional feedback from your Housing dept.
- Design – whether the development will create a safe and socially interactive environment.
- Design – overlooking, overshadowing, a dominating effect.
- Initial advice on planning contributions.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>

Sent: 19 December 2018 11:31

To: 'Jane Rodens' <Jane.Rodens@eastssuffolk.gov.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello Jane,

Thanks for your email. The deadline for the pre-app response is this Sunday and assuming you're not in the office on Sunday do you want or need to extend it?

Clearly our preference is always to get pre-app advice within the 28 day period. However in this case we would prefer to receive bespoke advice even if that means it coming in after the deadline because we need to advise our clients in terms of returning to the previous refusal or other options going forwards.

In order for them to use the Christmas period for putting their thinking caps on a response before Friday on the principle/numbers and RAMS points as a minimum would be appreciated.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk

Parker Planning Services Ltd will be closed for the Christmas Holidays from 5pm on 21st December 2018 until 9am on 2nd January 2019.

On behalf of Parker Planning Services Ltd, We would like to take this opportunity to say thank you and to wish you the very best for the New Year. May your Christmas go as planned!



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Parker Planning Services Ltd, Orchard House, Hall Lane, East Tuddenham, NR20 3LR
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From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>

Sent: 19 December 2018 11:20

To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>

Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

Sorry, for the delay in getting back to you and not being available yesterday.

Thank you for the meeting notes, I will add them to my own.

I have asked affordable housing the question about the additional information as detailed below and the meeting notes.

As detailed below, you have asked for information to be provided before and after the Christmas break. I cannot guarantee that I can provide the information before Christmas as tomorrow is planning committee, I have items to take.

I will try and provide the information that you have requested after Christmas, but I will let you know if I require any further information.

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505
Mobile: 07919303788

On 1 April 2019, we will become East Suffolk Council – a new 'super district' authority, serving the residents, businesses and communities of both Suffolk Coastal and Waveney. Importantly, it will be business as usual and the high quality services you receive from us will not be affected.

www.eastsuffolk.gov.uk



From: steven@parkerplanningservices.co.uk [<mailto:steven@parkerplanningservices.co.uk>]
Sent: 18 December 2018 14:40
To: Jane Rodens
Subject: FW: Rendlesham pre app DC/PREAPP/18/4778
Importance: High

Good afternoon Jane,

Further to our recent pre-app meeting, email of 13th Dec and attempts to telephone you yesterday and today, we are mindful of the limited time before the pre-app deadline can we suggest dividing the pre-app advice on the following basis; the first part to be provided by the end of this week and the second part asap after the Christmas break and by way of an extension of time and additional design meeting if required.

Part 1 before 5pm Friday 21st Dec

- With reference to our pre-app letter, meeting notes and with senior officer oversight as necessary, provide feedback on the principle of development and the quantum of housing
- Having been given additional information about the applicants and future occupants provide advice as to whether the development will create an inclusive and sustainable community
- Provide further information on the Recreational Avoidance Mitigation Strategy.
- Provide feedback on the mix of different bedroom properties.

Part 2 after Christmas

- The provision of Affordable Housing with additional feedback from your Housing dept.
- Design – whether the development will create a safe and socially interactive environment.
- Design – overlooking, overshadowing, a dominating effect.
- Initial advice on planning contributions.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk

Parker Planning Services Ltd will be closed for the Christmas Holidays from 5pm on 21st December 2018 until 9am on 2nd January 2019.

On behalf of Parker Planning Services Ltd, We would like to take this opportunity to say thank you and to wish you the very best for the New Year. May your Christmas go as planned!



Norfolk Office:

Parker Planning Services Ltd, Orchard House, Hall Lane, East Tuddenham, NR20 3LR
Phone: 01603 516319

Suffolk Office:

Parker Planning Services Ltd, Northgate Business Centre, 10 Northgate Street, Bury St Edmunds, Suffolk, IP33 1HQ
Phone: 01284 336348

Essex Office:

Parker Planning Services Ltd, Moulsham Mill, Parkway, Chelmsford, Essex, CM2 7PX
Phone: 01245 934184

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Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 31 January 2019 21:21
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

13

Good evening Jane,

Do you have an eta for the pre-app response on the 2nd part please?

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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From: Jane Rodens <Jane.Rodens@eastssuffolk.gov.uk>
Sent: 29 January 2019 14:11
To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>
Cc: planning <planning@eastssuffolk.gov.uk>
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

Thank you for your email, I will put in the information below.

Regards

Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District Councils
Tel: (01394) 444505

Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 07 February 2019 10:15
To: Steven Bainbridge
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

16

Hello,

The last bit of the pre-application is currently with my team leader for her to look at before I can send it over, I hope to have it by then.

Jane

From: steven@parkerplanningservices.co.uk [mailto:steven@parkerplanningservices.co.uk]
Sent: 07 February 2019 10:14
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Good morning Jane,

We are meeting on Monday to discuss Bentwaters. Will you be able to complete the pre-app for Rendlesham by then?

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>
Sent: 31 January 2019 21:21
To: 'Jane Rodens' <Jane.Rodens@eastsuffolk.gov.uk>
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Good evening Jane,

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 15 February 2019 18:51
To: Jane Rodens
Cc: Jason Parker
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

15

Good afternoon Jane,

We are disappointed not to have yet received the pre-application advice which we felt sure would have been with us by now following our meeting on Monday and earlier assurances.

Please can you give us a concrete date so that we can properly advise our clients on their options.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 07 February 2019 10:15
To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

The last bit of the pre-application is currently with my team leader for her to look at before I can send it over, I hope to have it by then.

Jane

From: steven@parkerplanningservices.co.uk [<mailto:steven@parkerplanningservices.co.uk>]
Sent: 07 February 2019 10:14
To: Jane Rodens
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 26 February 2019 15:46
To: Steven Bainbridge
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778
Attachments: jrodens_26-02-2019_15-45-03.pdf

16

Hello,

I have been looking at the design of the application as part 2 of the pre-application, I have the following comments to make, I have attached a scanned version of your plan to make it easier to refer to.

Access through the site

The amount of roads have been reduced from the previous application, to the east of the site but there are still a large amount of roads to the west of the site. Why can roads 1, 2, 3, 4, 5 and 6 not be removed from the site? This will then half the amount of hard standing that is being developed.

Can there not be connections made at the areas circled on the map attached? This will then improve the accessibility around the site.

The main road through the site is better, this makes a feature of it

Community space

What is this going to be used for? who is going to own this? It says educational, is this going to be a school for the rest of Rendlesham to use? Depending on the proposed use are two houses this close going to be impacted upon?

In the new local plan that is going through the consultation process (depending when a new application is going to be submitted) there is a requirement for a public house or other development of that nature.

Because this would be a development at the end of the main road through the site and highly visible it would be appropriate for it to be developed at an early stage so it is not left as blank land, or depending onto the potential development of the site this would be more appropriate as a garden. But detail would need to be provided at an early stage, to ensure that this can be conditioned or developed in a phase of the overall site.

Site Layout

Thank you for the separation distances, but this does not make it clear if there would still be direct looking between windows the houses appear to be staggered slightly but this could appear messy once developed if they are not lined up. Further detail would be required on the design of the dwellings and their relationship between each other.

Bungalows have been provided, where?

Are these still three and two storey height dwellings? Any semi-detached properties Terraced properties? to mix up the site

Why is the visitor parking still located near the park area? Can the parking for the properties be relocated to the side of the dwellings so they do not dominate the front of the properties?

Hedges and fences to the rear of the properties, it has been stated that these will be staggered and different heights. But there would still be a whole street of just hedges and fences. This would occur 13 times through the development. Once or twice, where there is an awkward site within the application site, but this is square and spacious enough not for there to be a problem where this needs to occur. This would be rectified by having back to back dwellings and them not facing the same direction. This would also open up some space for the gardens and the sites would not be restricted for the size of the dwellings.

From: steven@parkerplanningservices.co.uk [mailto:steven@parkerplanningservices.co.uk]
Sent: 15 February 2019 18:51
To: Jane Rodens
Cc: 'Jason Parker'
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Good afternoon Jane,

We are disappointed not to have yet received the pre-application advice which we felt sure would have been with us by now following our meeting on Monday and earlier assurances.

Please can you give us a concrete date so that we can properly advise our clients on their options.

Regards,



Steven Bainbridge
Principal Planning Manager
Parker Planning Services Ltd
Phone: 01284 336121

steven@parkerplanningservices.co.uk



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From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 07 February 2019 10:15
To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>
Subject: RE: Rendlesham pre app DC/PREAPP/18/4778

Hello,

The last bit of the pre-application is currently with my team leader for her to look at before I can send it over, I hope to have it by then.

Jane

This drawing is the property of
 CC Developments
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 and © David Williams 2018
 and it can be used
 only for developments at
 Rendesham in Suffolk



KEY SITE ELEMENTS

- Site boundary
- Existing trees
- Proposed trees
- Play area
- Reserved Land (educational)
- Community building
- Parking space
- Parking (disabled)
- Parking (visitors)
- Cycle store
- Parking motor cycles
- Bin collection point
- Minor access road (adoptable)
- Raised platform junction
- Speed bump
- Shared surface road (private)
- Driveway (private)
- Perimeter green space
- Footway (adoptable)
- Footway (private)
- Pumping station
- Swales (new)
- Swales (existing)

KEY MIX

25 Houses

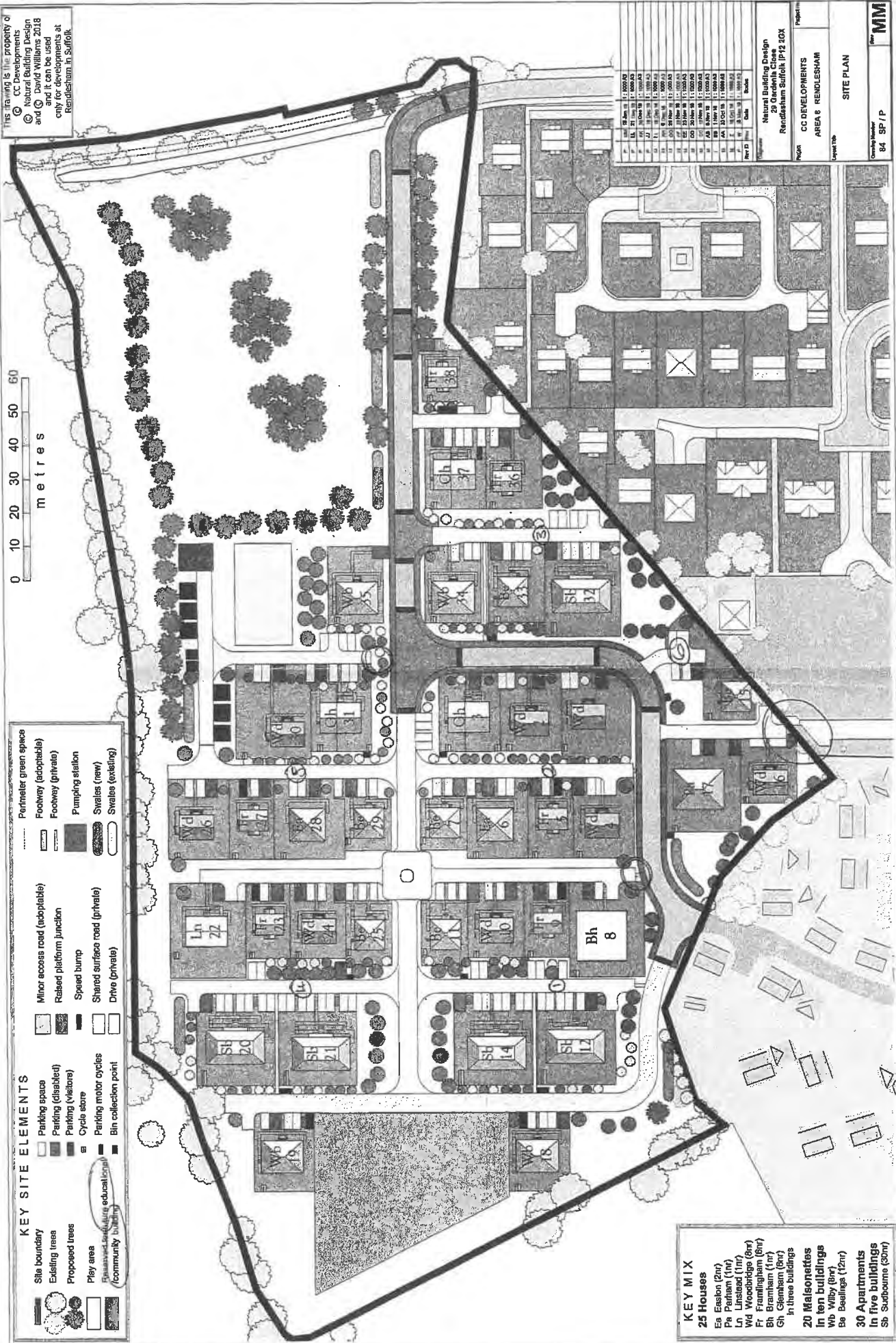
- Ea Easton (2nr)
- Pa Parton (1nr)
- Li Littleton (1nr)
- Wd Widdowson (6nr)
- Fr Framingham (6nr)
- Bh Bramham (1nr)
- Gh Glemham (6nr)

20 Maisonettes

- In ten buildings
- Wb Wilby (6nr)
- Ba Bealings (12nr)

30 Apartments

- In five buildings
- Sb Sudbourne (30nr)



Ref	ID	Code	Area	Volume	Value	Notes
1	1	1	1	1	1	1
2	2	2	2	2	2	2
3	3	3	3	3	3	3
4	4	4	4	4	4	4
5	5	5	5	5	5	5
6	6	6	6	6	6	6
7	7	7	7	7	7	7
8	8	8	8	8	8	8
9	9	9	9	9	9	9
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97	97	97	97	97	97	97
98	98	98	98	98	98	98
99	99	99	99	99	99	99
100	100	100	100	100	100	100

Project Information

Project Name: Natural Building Design
 29 Gardens Close
 Rendesham Suffolk IP22 2DX

Project No: CC DEVELOPMENTS
 AREA 8 RENDESHAM

Project Title: SITE PLAN

Drawing Number: 84 SP / P

Scale: 1:1000

Author: MM

CONNECTION

Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 29 April 2019 10:23
To: Steven Bainbridge
Subject: DC/19/1499/FUL

17

Hello,

I hope you are well.

I have been going through the application and have a question about the housing numbers.

On the floor plans it shows that Deben has 2 bedrooms but on drawing 84 SP/Pv J it says that Deben has 3 bedrooms, this is the same for Bramfield.

Also on plan 84 SP/Pv plot 2 is double counted.

No bedroom	Framlingham	Easton	Woodbridge	Bramfield	Deben	Glemham	Bealings	Wilby	S
1								4	
2				2 (but this would change see above)	2 (but this would change see above)		6	4	1
3	6					4 or 3 if not plot 2	6	4	1
4+		2	8 or 7 if not plot 2			4 or 3 if not plot 2			
Total									

I hope this makes sense, there may be some more questions later.

Regards



Jane Rodens BA (Hons) MA MRTPI | Area Planning and Enforcement Officer
East Suffolk Council
01394 444505
www.eastsuffolk.gov.uk

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Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 29 April 2019 14:28
To: Jane Rodens
Subject: RE: DC/19/1499/FUL

18

Good afternoon Jane,

Thank you for your email. I will defer to the client for confirmation and then, if need be, provide an amended drawing or two, although we suggest waiting to make amendments until after the consultation period has ended so as to minimise the submission of amended plans.

In answer to your points though I suspect that drawing 84 SP/Pv J will be amended to state that both the Deben and Bramfield only have two bedrooms to align with the floor plans and that Plot 2 has indeed been double-counted and would be removed from the entry for 'Glemham' in the schedule.

Aside from that we would like to schedule a time to speak about phasing and other matters as Birketts Solicitors are in the process of drafting the s106 now if you would like to let me know when you are available and in the office later this week.

Unconnected to this application; please can you confirm whether you agree to an extension and the stat decs clarifying on the Badingham LDC application and I have various data and responses for you for Bentwaters which I am aware I need to send over asap.

Regards

Steven Bainbridge
Principal Planning Manager

Email: steven@parkerplanningservices.co.uk
Phone: 01284 336121

www.parkerplanningservices.co.uk
Chartered town planners & multi-disciplinary specialists



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Steven Bainbridge

From: PPS Project Emails
Subject: FW: DC/19/1499/FUL

19

From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>
Sent: 30 April 2019 12:58
To: 'Jane Rodens' <Jane.Rodens@eastsuffolk.gov.uk>
Subject: RE: DC/19/1499/FUL

Good morning Jane,

Further to the emails below please see below answers to your queries and some corrections made to your table.

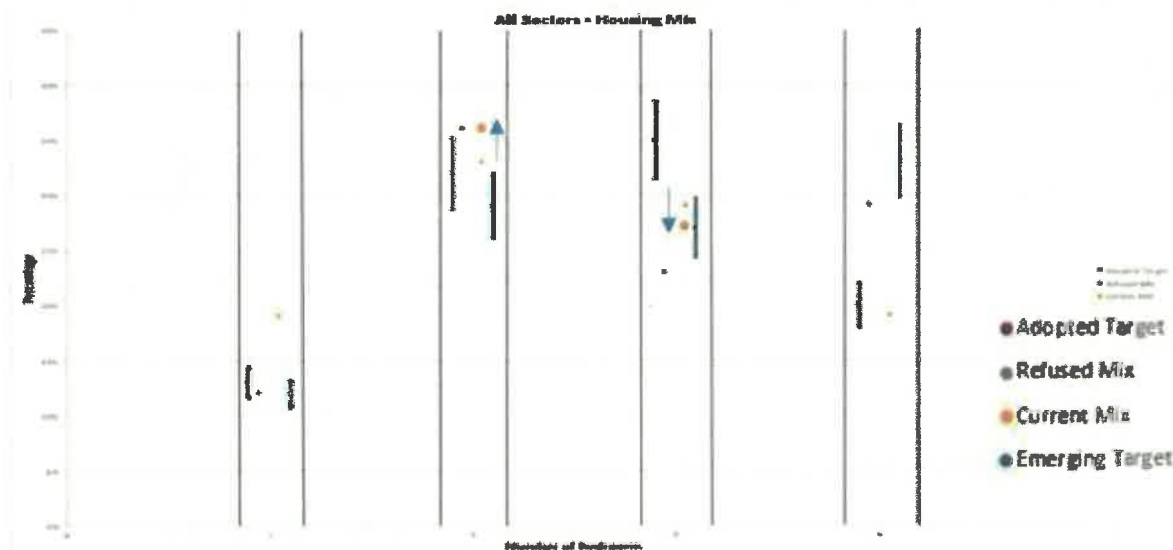
No bedroom	Fram	Easton	Woodbridge	Bramfield	Deben	Glemham	Bealings	Wilby	Sudbury	Total
1								4	10	4-14
2				1 2 (but this would change see above)	1 2 (but this would change see above)		6	4	10-15	24-27
3	6					4 or 3 if not plot 2	6	4	15	34-20
4+		2	8 or 7 if not plot 2			4 or 3 if not plot 2				13-14
Total										75

I imagine the schedule on the access and parking plan 84 SP/Pv J will be amended along these lines in due course if required:

SCHEDULE OF BUILDINGS & PARKING				Parking	
Nr	TYPES & NRS BEDROOMS	PLOTS		Nr	Total
2	Easton detached house 5bed	1 26		3	6
8	Woodbridge det house 5bed	2 4 6 9 16 23 28 30		3	24
6	Framlingham det house 3bed	5 10 24 27 36 38		2	12
1	Bramfield bungalow 2bed	8		2	2
1	Deben bungalow 2bed	17		2	2
4	Glemham semi-det 4bed; 2bed	3 22 31 37		5	20
6	Bealings maisonettes 3bed; 2bed	7 11 15 25 29 33		4	24
4	Wilby apmts 3bed; 2bed; 1bed	18 19 34 35		5	20
5	Sudbury apmts 3x3bed; 2x2bed	12 14 20 21 32		8	40
	Visitors				15
	TOTALS				165

I've made a couple of other corrections to your table above moving the Sudbury's up a level as they were in the wrong rows.

So, following the correction to the Deben and Bramfield through, it would have the following small changes (two orange dots moving) to the mix table in the planning statement:



I am in the SCDC offices this afternoon (meeting Paul Wood on another matter) but if you wanted to go through anything else I could do that around 4pm?

Also, as a slight aside to this application, you may have seen this TV programme recently?

<https://www.bbc.co.uk/iplayer/episode/m0004gth/your-home-made-perfect-series-1-episode-2> One of the architects on the programme talked a lot about the orientation of homes in order to allow lots of natural light in. It said he had 'trained in the east (i.e. Asia/India) on long established architectural principles' and was bringing those principles with him into his profession. In the programme he proposed to reorientate the subject house by inserting windows and moving the front door to get more light in. He also talked about the different 'colours' of light that one gets throughout the day; in the morning from the east (blue) and in the afternoon from the west (red) and the importance of allowing this light into homes. We note that the emerging local plan now talks about the orientation of homes for maximising daylight. The architectural principles imbued in the houses in this application are the same and take this point about maximising daylight through the orientation of homes seriously. I appreciate the response to that is to then query potential amenity impacts from overlooking but we only need look at many modern apartment block developments to see how people will readily accept alternative levels of inter-visibility, different from the 'traditional' street layouts. We see this principle elsewhere; an individual might move into a flat at the docks in Ipswich for example, fully aware that their balcony is technically openly visible to many others with no private sitting out area at all, but they move in nonetheless accepting, probably seeking, an alternative form of living and as planners we think nothing of it. Just a thought about how these matters are finding their way into mainstream approaches increasingly.

Regards

Steven Bainbridge
Principal Planning Manager

Email: steven@parkerplanningservices.co.uk
Phone: 01284 336121

www.parkerplanningservices.co.uk
Chartered town planners & multi-disciplinary
specialists



Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 01 May 2019 14:27
To: Steven Bainbridge
Subject: RE: DC/19/1499/FUL

20

Hello,

Thank you for confirming the housing, I will await for the new plans.

I am away for the rest of the week and not back until the middle of next week, when you have the draft S106 I can send this to the legal department to have their comments on it before we talk about it, in case there are other things to add.

For the certificate of lawfulness application this would either need to be refused or withdrawn as it out of date, we can not keep it going any further. I have spoken to legal department and they will be able to get a decision out after the bank holiday unless it is withdrawn before hand.

If you can send the Bentwaters information over ASAP that would be much appreciated as we have some unhappy neighbours.

Regards



Jane Rodens BA (Hons) MA MRTPI | Area Planning and Enforcement Officer
East Suffolk Council
01394 444505
www.eastsuffolk.gov.uk

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From: steven@parkerplanningservices.co.uk [mailto:steven@parkerplanningservices.co.uk]
Sent: 29 April 2019 14:28
To: Jane Rodens
Subject: RE: DC/19/1499/FUL

Good afternoon Jane,

Thank you for your email. I will defer to the client for confirmation and then, if need be, provide an amended drawing or two, although we suggest waiting to make amendments until after the consultation period has ended so as to minimise the submission of amended plans.

In answer to your points though I suspect that drawing 84 SP/Pv J will be amended to state that both the Deben and Bramfield only have two bedrooms to align with the floor plans and that Plot 2 has indeed been double-counted and would be removed from the entry for 'Glemham' in the schedule.

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 01 May 2019 17:13
To: 'Jane Rodens'
Subject: RE: DC/19/1499/FUL

21

Hello Jane,

Rendlesham

Since my email below you'll have received another one with additional info. We've seen the holding objection from SCC flood and are on the case with that. Otherwise it would be useful to understand what your initial views are on this application this time around.

Badingham

Will you be responding to our other email on this? The one with the various questions in and offers to clarify details. Also, I don't agree with the point "*we can not keep it going any further*" we have already suggested an extension of time so please can we agree a date? I don't mind if its pushed back to the end of May or later for comfort sake, that way the fact its already gone over time won't count against the Council's performance indicators.

DMPO

Certificate of lawful use or development

39.— (10) Where a valid application has been received, the local planning authority must give the applicant written notice of their decision within—

*(a) the period of 8 weeks beginning with the day immediately following that on which the application is received; or
(b) unless the applicant has already given notice of appeal to the Secretary of State, within such extended period as may be agreed in writing between the applicant and the authority.*

Bentwaters

Will do – I know exactly that problem!

Regards

Steven Bainbridge
Principal Planning Manager

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Phone: 01284 336121

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Northgate Business Centre,
10 Northgate Street, Bury St Edmunds,
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Essex Office:
Parker Planning Services Ltd,
Moulsham Mill, Parkway,
Chelmsford,
Essex. CM2 7PX
Phone: 01245 934184

Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 07 May 2019 16:50
To: Steven Bainbridge
Subject: RE: DC/19/1499/FUL

22

Hello,

I will be able to give you my views once the consultation has finished on the application, but not before.

Yes, it would not effect our figures, but it is up to the Team Leaders to agree to the extension of time but they are only saying yes to committee items other exceptional circumstances. This application is neither of them.

Regards



Jane Rodens BA (Hons) MA MRTPI | Area Planning and Enforcement Officer
East Suffolk Council
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Sent: 01 May 2019 17:13
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Will you be responding to our other email on this? The one with the various questions in and offers to clarify details. Also, I don't agree with the point "*we can not keep it going any further*" we have already suggested an extension of time so please can we agree a date? I don't mind if its pushed back to the end of May or later for comfort sake, that way the fact its already gone over time won't count against the Council's performance indicators.

DMPO

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 14 May 2019 15:14
To: 'Jane Rodens'
Subject: Planning application 19/1499

23

Importance: High

Good morning Jane,

Last night we attended the Rendlesham parish council meeting at which planning application 19/1499 was discussed. As a result of recent parish elections the parish council now includes a number of new and as yet untrained councillors with very little understanding of planning. It appeared to us that the meeting was dogged by a lack of understanding of planning as a whole, let alone the details of the planning application. This in our opinion led to the objection to the planning application, we may provide feedback to the issues raised by the parish and others in a post-consultation rebuttal statement. We note the recent response from the Council's policy dept. too and will have comments on this in due course in this forum or another.

We would urge the Council to be mindful of planning best practice guidance and to work together with the applicant to reduce the number of matters in contention in order to reduce the scope of issues to be put before planning committee (if the call in procedure is triggered and followed through) or to an inquiry and to avoid unnecessary costs to the Council, the applicant and consultees who may become involved, should you be recommending refusal of the application.

On that basis we would like to meet with the Council soon to go through outstanding matters and, if necessary, bring this application to a conclusion as soon as possible to avoid unnecessary delay.

Likewise we have a draft s106 and some suggestions for amendments to deal with consultee concerns if the Council is minded to discuss them as an essential part of an ongoing positive approach to the planning application.

Regards

Steven Bainbridge
Principal Planning Manager

Email: steven@parkerplanningservices.co.uk
Phone: 01284 336121

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Norfolk Office:
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Chelmsford,
Essex. CM2 7PX
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Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 21 May 2019 13:22
To: 'Jane Rodens'
Subject: RE: Planning application 19/1499

24

Good afternoon Jane,

Further to our email below we are preparing a rebuttal statement which will round up consultation responses, include the draft s106, and summarise the applicant's current proposals thus far vs. consultee requests, for discussion with the local planning authority.

Please can we arrange a date to meet to go through this, probably somewhere in week beginning 3rd June? Also it may be prudent for the LPA to seek an extension of time from the applicant now as it is reasonably foreseeable one will be required.

Regards

Steven Bainbridge
Principal Planning Manager

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From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>
Sent: 14 May 2019 15:14
To: 'Jane Rodens' <Jane.Rodens@eastsoffolk.gov.uk>
Subject: Planning application 19/1499
Importance: High

Good morning Jane,

Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 21 May 2019 13:43
To: Steven Bainbridge
Subject: RE: Planning application 19/1499

25

Hello,

Thank you for your email, I have been going through the consultation responses also, it may be useful to read a rebuttal statement and any other information that you may have. If you are going to provide a draft S106 this would need to be with myself as soon as possible to be able to provide some comment on it and to pass it on to the legal department ready for any meeting that we are to have.

As it currently stands the application will be recommended for refusal, as the concerns that have been raised previously still have not been addressed. At this moment in time I will not be seeking an extension of time, the determination date of this application is the 8th July.

I am more than happy to discuss the application as it currently stands, would you be available on the 3rd June at 11?

One thing has come to light, but has not yet been made available on public access, is the land ownership at the access from Tidy road, we have had a look at the land registry and it appears that there is two strips of land between the highway land and your land, which are not owned by yourself. Can this also be clarified.

Regards



Jane Rodens BA (Hons) MA MRTPI | Area Planning and Enforcement Officer
East Suffolk Council
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Sent: 21 May 2019 13:22
To: Jane Rodens
Subject: RE: Planning application 19/1499

Good afternoon Jane,

Further to our email below we are preparing a rebuttal statement which will round up consultation responses, include the draft s106, and summarise the applicant's current proposals thus far vs. consultee requests, for discussion with the local planning authority.

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 21 May 2019 13:48
To: 'Jane Rodens'
Subject: RE: Planning application 19/1499

26

Hello Jane,

Lets pencil in 3rd June 11am so we don't lose the date. It would be useful to know in summary which of the previous 8 reasons remain outstanding this time as we consider the consultation responses.

Regards

Steven Bainbridge
Principal Planning Manager

Email: steven@parkerplanningservices.co.uk
Phone: 01284 336121

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From: Jane Rodens <Jane.Rodens@eastssuffolk.gov.uk>
Sent: 21 May 2019 13:43
To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>
Subject: RE: Planning application 19/1499

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Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 21 May 2019 13:58
To: 'Jane Rodens'
Subject: RE: Planning application 19/1499

27

Hello again, can you provide me with a 'screen grab' of these strips so I can compare them to our red line and other land registry info we have on our GIS system?

Regards

Steven Bainbridge
Principal Planning Manager

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Phone: 01284 336121

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Subject: RE: Planning application 19/1499

Hello Jane,

Lets pencil in 3rd June 11am so we don't lose the date. It would be useful to know in summary which of the previous 8 reasons remain outstanding this time as we consider the consultation responses.

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 28 May 2019 17:17
To: 'Jane Rodens'
Subject: RE: Planning application 19/1499

28

Importance: High

Good afternoon Jane,

Further to the email trail below:

1. Can we have sight of the strips of land please?
2. We are getting the s106 drafted by Birketts and it will be with you soon but you wanted it sufficiently in advance of the meeting to pass it to legal and get it back before Monday. That seems unlikely at this stage. We are also getting QC's advice on various matters and would have clearer advice for the Council on this if we postponed Monday's meeting say by one week to 10th June 2019.

Regards

Steven Bainbridge
Principal Planning Manager

Email: steven@parkerplanningservices.co.uk
Phone: 01284 336121

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From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>
Sent: 21 May 2019 13:58
To: 'Jane Rodens' <Jane.Rodens@eastssuffolk.gov.uk>
Subject: RE: Planning application 19/1499

Hello again, can you provide me with a 'screen grab' of these strips so I can compare them to our red line and other land registry info we have on our GIS system?

Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 28 May 2019 17:31
To: Steven Bainbridge
Subject: RE: Planning application 19/1499

29

Hello,

Here is the plan.



The other reference as it falls off the map is SK322252

That is not a problem with me, but I would much rather have a meeting sooner rather than later, so anything we can agree on can be agreed within the time scale, as I am not going to be extending the time of the application.

Can you confirm that you would like to have a delay on the meeting? If yes then I will look to book one.

Regards



Jane Rodens BA (Hons) MA MRTPI | Area Planning and Enforcement Officer
East Suffolk Council
01394 444505
www.eastsuffolk.gov.uk

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From: steven@parkerplanningservices.co.uk [mailto:steven@parkerplanningservices.co.uk]
Sent: 28 May 2019 17:17
To: Jane Rodens
Subject: RE: Planning application 19/1499
Importance: High

Good afternoon Jane,

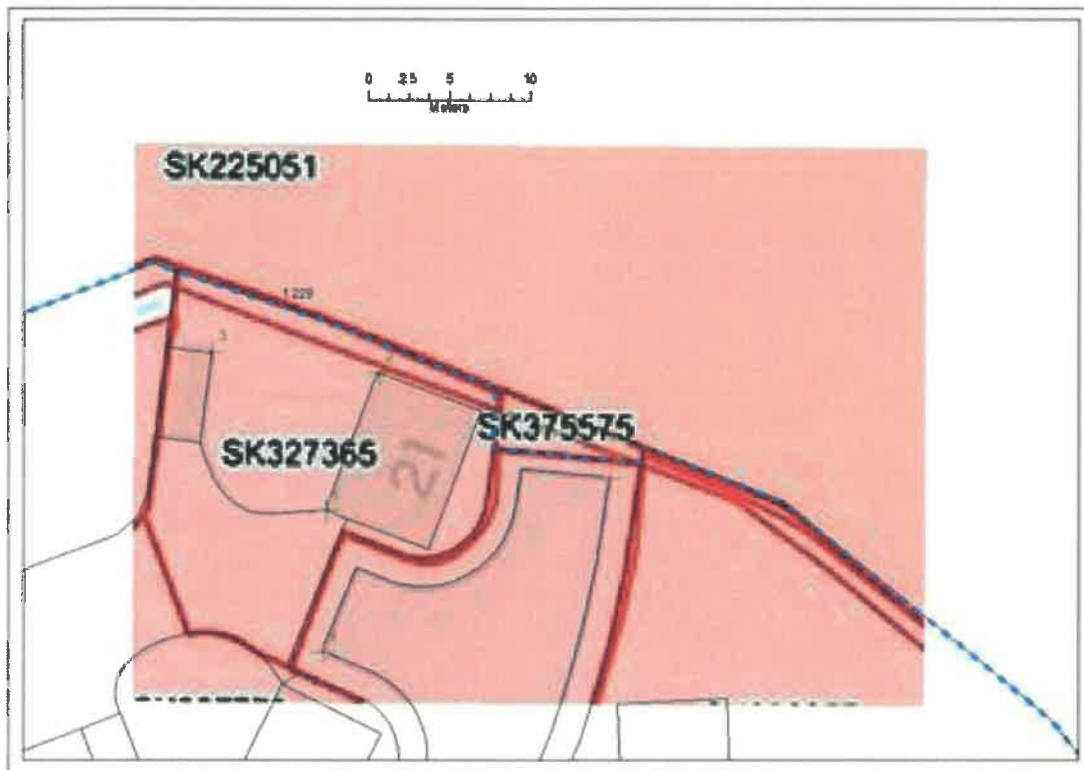
Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 28 May 2019 17:51
To: 'Jane Rodens'
Subject: RE: Planning application 19/1499

30

Hello Jane, if we can book 10th June please.

The image below shows your land reg info georeferenced in a GIS program to the Ordnance Survey base map with the application red line (shown blue and dashed for ease of reference) superimposed on top. This shows that the application red line is sufficient to cover the 'gap' between the site and Tidy Road.



Regards

Steven Bainbridge
Principal Planning Manager

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Phone: 01284 336121

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parker
planning
services



Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 31 May 2019 13:10
To: Steven Bainbridge
Subject: RE: Planning application 19/1499

31

Hello,

Would the 12th June at 10:00 be ok? I cannot do the 10th June because of Planning Committee.

Regards



Jane Rodens BA (Hons) MA MRTPI | Area Planning and Enforcement Officer
East Suffolk Council
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Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 31 May 2019 17:09
To: 'Jane Rodens'
Subject: RE: Planning application 19/1499

32

Yes, 12th at 10am is fine.

Regards

Steven Bainbridge
Principal Planning Manager

Email: steven@parkerplanningservices.co.uk
Phone: 01284 336121

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Sent: 31 May 2019 13:10
To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>
Subject: RE: Planning application 19/1499

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Regards

Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 03 June 2019 15:59
To: Steven Bainbridge
Subject: DC/19/1499/FUL



Hello,

I have had a phone call from Cllr Herring about this application, he would like to come to the meeting next week, is this ok with you, as this is your meeting?

Regards



Jane Rodens BA (Hons) MA MRTPI | Area Planning and Enforcement Officer

East Suffolk Council

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This message has been scanned for malware by Websense. www.websense.com

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 03 June 2019 16:14
To: 'Jane Rodens'
Subject: RE: DC/19/1499/FUL

34

Hello, yes this is fine with the applicants.

Regards

Steven Bainbridge
Principal Planning Manager

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Phone: 01284 336121

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Regards

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 07 June 2019 16:39
To: 'Jane Rodens'
Cc: ray.herring@eastsuffolk.gov.uk
Subject: RE: DC/19/1499/FUL

35

Good afternoon Jane,

Further to your email below, as you know we are meeting at the Council offices next week and Ward Councillor Herring has asked to attend, which we think is essential.

In an earlier email I referred you to the fact the applicants were taking Counsels advice – the email I got back indicates, I hope, that you simply missed that reference.

In any event, the applicants met today with Mr. Paul Shadarevian QC (you may not know he defended SCDC's Core Strategy in the High Court) and we can discuss the implications of this on Wednesday.

Suffice it to say though, and as we had suggested last time, we would again strongly suggest a senior member of planning staff attend that meeting with you.

So to confirm it is on Wednesday 12th June at 10am. Have a good weekend.

Regards

Steven Bainbridge
Principal Planning Manager

Email: steven@parkerplanningservices.co.uk
Phone: 01284 336121

www.parkerplanningservices.co.uk
Chartered town planners & multi-disciplinary specialists



Norfolk Office:
Parker Planning Services Ltd,
Orchard House,
Hall Lane, East Tuddenham.
Norfolk. NR20 3LR
Phone: 01603 516319

Suffolk Office:
Parker Planning Services Ltd,
Northgate Business Centre,
10 Northgate Street, Bury St Edmunds,
Suffolk. IP33 1HQ
Phone: 01284 336348

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From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 03 June 2019 15:59

Steven Bainbridge

From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 07 June 2019 16:43
To: Steven Bainbridge
Subject: RE: DC/19/1499/FUL

36

Hello,

Thank you for your email.

I am sorry to say that Cllr Herring will now not be attending the meeting on Wednesday.

See you on Wednesday.

Regards



Jane Rodens BA (Hons) MA MRTPI | Area Planning and Enforcement Officer
East Suffolk Council
01394 444505
www.eastsuffolk.gov.uk

East Suffolk Council is a new district authority which, from April 2019, delivers services for the residents, businesses and communities previously served by Suffolk Coastal and Waveney District Councils

From: steven@parkerplanningservices.co.uk [mailto:steven@parkerplanningservices.co.uk]
Sent: 07 June 2019 16:39
To: Jane Rodens
Cc: Ray Herring
Subject: RE: DC/19/1499/FUL

Good afternoon Jane,

Further to your email below, as you know we are meeting at the Council offices next week and Ward Councillor Herring has asked to attend, which we think is essential.

In an earlier email I referred you to the fact the applicants were taking Counsels advice – the email I got back indicates, I hope, that you simply missed that reference.

In any event, the applicants met today with Mr. Paul Shadarevian QC (you may not know he defended SCDC's Core Strategy in the High Court) and we can discuss the implications of this on Wednesday.

Suffice it to say though, and as we had suggested last time, we would again strongly suggest a senior member of planning staff attend that meeting with you.

So to confirm it is on Wednesday 12th June at 10am. Have a good weekend.

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 12 June 2019 21:32
To: 'Jane Rodens'
Cc: [REDACTED]
Subject: Rendlesham 19/1499 legal note
Attachments: PS QC meeting note 07 06 19 final.pdf

37

Importance: High

Ms. Rodens,

Further to this afternoon's meeting please find attached the note from the meeting the applicants had with Mr. Paul Shadarevian QC <https://cornerstonebarristers.com/barrister/paul-shadarevian/> who is well known to the LPA.

As the note says it is not a full legal opinion, although one could be sought if the LPA requested as such, but this would be a further significant expense and would therefore need to be contingent on the LPA demonstrating a willingness to objectively review their position, not just to refine the remaining outstanding issues, but to go further and seek to avoid an unnecessary planning appeal and provide the environment within which this can be done.

An immediate would be dropping this arbitrary approach to extensions of time being advocated by, you said, "the team leaders".

In this respect we strongly suggest the LPA take note of the advice of Mr. Shadarevian QC set out in the email trail below.

If the LPA agrees that *"that it would be proper, in the circumstances, to do so"*, we would suggest the LPA request an extension of time from the applicants to at least 8th September 2019 to allow further discussion and consideration of design matters (such as those discussed today), amendments to be submitted and reconsulted on and for the LPA to then reconsider the planning balance before getting to a 'minded to' position a second time.

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From: Paul Shadarevian <[REDACTED]>
Sent: 12 June 2019 19:27
To: steven <steven@parkerplanningservices.co.uk>
Subject: Re: Rendlesham update for Paul and one question - follow up email

Steven, thank you for your email.

I am of the opinion that there is a every justification for the council both to request and to agree to a reasonable extension of the determination period and that it would be proper, in the circumstances, to do so.

It seems to me that the objections to the scheme are capable of being resolved or, at the very least, clarified and better particularised, so that potential issues can be narrowed down to enable the applicant to respond and propose changes that might avoid the necessity of going to appeal. In the event that an appeal is necessitated, it will at least enable the parties to narrow the issues before the appointed Inspector.

I am also of the view that the failure of the LPA to agree to a reasonable extension may well bolster any subsequent application for a partial or full award of costs.

I am happy for you to share my advice to you with the case officer.

Best wishes, Paul.

From: "steven" <steven@parkerplanningservices.co.uk>
To: "Paul Shadarevian" <[REDACTED]>
Cc: "CC Developments" <ahardy@ccdevelopments.co.uk>, "Jeanie" <jeaniefivesley@yahoo.com>
Sent: Wednesday, 12 June, 2019 19:14:25
Subject: Rendlesham update for Paul and one question - follow up email

Dear Paul,

We met today with the planning officer on our planning application. The LPA are "refusing to allow an extension of time because the extent of any design changes that might be provided would trigger a reconsultation". It is our opinion that this does not follow Planning Practice Guidance which states:

In what ways can a longer time period be agreed?

Where it is clear at the outset that an extended period will be necessary to process an application, the local planning authority and the applicant should consider entering into a planning performance agreement before the application is submitted.

If a valid application is already being considered and it becomes clear that more time than the statutory period is genuinely required, then the local planning authority should ask the applicant to consider an agreed extension of time. Any such agreement must be in writing and set out the timescale within which a decision is expected. The timetable set out in a planning performance agreement or extension of time may be varied by agreement in writing between the applicant and the local planning authority.
Paragraph: 003 Reference ID: 21b-003-20140306

We believe the following provide 'genuine' reasons for an extension of time:

- Consideration of the draft s106 handed over today which should satisfy some of the outstanding matters such that they are not reasons for refusal.
- An opportunity for the applicant to make design changes where possible and for the LPA to consider the effect of those changes in the planning balance.
- Clearing up the apparent inconsistencies in the CIL/s106 requirements from the County Council.
- The receipt of a legal advice note from the applicants.

Should the LPA reconsider their position in terms of an extension of time?

Regards

Steven Bainbridge
Principal Planning Manager

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Phone: 01284 336121

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--
Paul Shadarevian QC
Cornerstone Barristers

M: 07768 827777
S: 020 7242 4986
www.cornerstonebarristers.com

2-3 Gray's Inn Square, London, WC1R 5JH
DX: LDE 316 Chancery Lane

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We make every effort to keep our network free from viruses. However, you do need to verify that this e-mail and any attachments are free of viruses as we can take no responsibility for any computer virus which might be transferred by way of this e-mail.

Note of Meeting with Mr. Paul Shadarevian QC

Capital Community Developments Ltd and Parker Planning Services Ltd. on Friday 7th June 2019

The following constitutes a summary of a consultation between the applicants to planning application 19/1499, their agents Parker Planning Services and Counsel Mr. Paul Shadarevian QC. This meeting note is not a full legal opinion but has been agreed with Counsel and can be shared with the LPA.

A full legal opinion can be provided but this is contingent on the LPA demonstrating a willingness to objectively review their position, not just to refine the remaining outstanding issues, but to avoid an unnecessary planning appeal and provide the environment within which this can be done.

If the LPA are open to approaching this situation positively then the applicants are willing to consider design changes and further background information by way of an amendment to the current application.

Main Issues

The following are the main planning issues discussed at the meeting:

1. That the tilted balance situation still applies insofar as it can be argued that policy SP2 is out of date and is one of the policies which are most important for determining the application in accordance with NPPF para.11.
2. In any event, and notwithstanding this, the site is allocated and therefore the principle of development is established and there is a presumption in favour of the development of the site for housing.
3. The site allocation of 'approximately 50 dwellings' is clearly based on perceived limitations which need to be assessed one by one on their own merits and without which there would be a requirement for the proposal to be assessed in line with the NPPF; in particular principles of boosting housing supply and efficient use of land, as well as provision of open space and providing necessary planning obligations. Thus, in determining whether it would be appropriate to grant permission in excess of the number specified in SSP12, it is necessary to have regard to the reasons for the imposition of the cap and whether the reasons still apply and justify the restriction.
4. There is a deep concern about matters appearing in certain of the reasons for refusal.

Commentary on the Previous Reasons for Refusal

The local planning authority have recently said "As it currently stands the application will be recommended for refusal, as the concerns that have been raised previously still have not been addressed. At this moment in time I will not be seeking an extension of time, the determination date of this application is the 8th July".

Therefore, in the absence of any other advice from the local planning authority, we have discussed the previous reasons for refusal because the LPA have indicated they still stand 'unaddressed'.

Reason no.1. Principle and quantum of development

It is wrong for the LPA to say that more than 50 dwellings constitutes overdevelopment in principle by reference to the policy cap alone. Once it is established that the constraints that supposedly justified the cap are capable of being addressed in order to accommodate the higher figure, and albeit technically above the policy cap, the proposal needs to be considered in terms of NPPF imperatives and the presumption in favour of sustainable development. These constitute "other material considerations" and these are weighty indicators that the policy cap should not be applied. The proposed development density of 23 dwellings per hectare is an acceptable development density bearing in mind the character and density of adjacent development and the proposed layout and landscaping treatment.

Note of Meeting with Mr. Paul Shadarevian QC

Capital Community Developments Ltd and Parker Planning Services Ltd. on Friday 7th June 2019

Reason no.2 Open Market Status

There are very serious concerns in relation to the content and approach to this reason for refusal. The LPA need to provide a full explanation of what they are 'concerned' about. However, it appears to the applicants that there is no basis in fact for these 'concerns', there is no evidence provided by the LPA, and there is no reference to any policies that justify, these 'concerns' and the LPA are in fact going beyond the principal issue in policy SP3 and are departing from development plan policy requirements. The obligation on the part of the LPA is determine objectively whether the principle of the development for 75 as opposed to 50 dwellings is acceptable.

Reason no.3 Housing Mix

Housing mix is governed by policy SP3 of the local plan. It only requires that "housing to provide for the full range of size, type and tenure of accommodation to meet the needs of the existing and future population". It is important to note that supporting paragraphs to policy SP3 and Table 3.6 are only 'general rules' applicable across the district as a whole and do not form part of the policy. The proposed mix should be viewed positively in this regard.

Reason no.4 Affordable housing

The level of affordable housing conforms to policy requirements and the tenures reflect recent NPPF guidance. It is essential for the LPA to recall their own internal advice from a review of the viability assessment which concluded that a proposal of 20 dwellings for affordable housing was justifiable. The level of affordable housing therefore remains a matter for discussion and in light of other obligations which may be placed on the developer and this was set out in the submitted Planning Statement (para 3.36).

Reason no.5 safety and inclusivity

The previous reason for refusal advances no evidence in support of the contention that the design is inherently unsafe and the latest response from Suffolk Constabulary merely offers suggestions on improving safety via design in line with the guidance document Safety by Design (which it is noted that SCDC have not adopted as policy or guidance). The applicants are willing to look at plot-specific matters within the bounds of this application in order to accede to some of the requirements of the LPA and Suffolk Constabulary.

Notwithstanding, the LPA have previously advanced no evidence that the proposal was inherently non-inclusive. Indeed, the existing development at Garden Square and Gardenia Close has residents from diverse ethnic, cultural and religious backgrounds and these residents are actively engaged in a wide variety of local organisations and pursuits.

Reason no.6 design matters (overlooking, overshadowing and a dominating effect)

Those attending the meeting drove around the existing development on Garden Square and Gardenia Close and the neighbouring developments on the Redwald Estate and Mayhew Road and Tidy Road. The layout of the proposed development is very much in keeping with the two existing developments to the south and east. The design has far greater separation distances than has previously been found acceptable on the neighbouring development at Garden Square and Gardenia Close. Separation distances are also far greater than in other developments around Rendlesham. The experience of living in one of the existing houses is of a well spaced and sufficiently private development. The design criticisms need to be better understood and the reasons given by the LPA are very opaque. The LPA needs to clarify its position on design and layout in

Note of Meeting with Mr. Paul Shadarevian QC

Capital Community Developments Ltd and Parker Planning Services Ltd. on Friday 7th June 2019

order to understand why the proposed design and layout is unacceptable. It is noted that the PC is of the view that the design and layout is consistent with the objectives of the NP.

The applicants are willing to provide further design guidance and support for the LPA so they can better understand how the proposal conforms with their local plan design policies and NPPF requirements. The success of the neighbouring development should be used as a precedent in this regard and it would be of assistance to understand whether the LPA has any legitimate criticisms of this in this context. A reason for refusal on design and layout would need to be justified by clear evidence of dysfunctionality and harm, not merely design preferences.

Reasons no.7 and no.8 HRA and other contributions

This matter has been dealt with through the provision of draft heads of terms in the planning statement and the provision of a draft s106.

Conclusions

There is deep concern about certain matters appearing in reasons for refusal and reason no.2 is not based on any particular policy. Its implications are disguised and may indicate that non-planning related matters are being taken into account. The LPA needs to clarify its position on this.

However, if the LPA are open to reconsidering their position on the matters they themselves have described as 'immovable' then the planning application, subject to a proportionate extension of time, should be capable of being agreed at the local level without the need for recourse to the Planning Inspectorate. The prospects of success on appeal, assuming that the proposed layout and density (with the higher number) can be satisfactorily accommodated in principle, are good. There may also be a sound argument for at least a partial award of costs against the LPA.

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 21 June 2019 15:11
To: 'Jane Rodens'; 'Ben Woolnough'
Subject: 19/1499 query

38

Good afternoon,

We await a response from the LPA regarding recent correspondence on this application. However, in the meantime can we just ask a quick question?

Am I right there was an SCC Flood response on the website on 12th June that is no longer there? The 18/2374 flood response, which didn't appear until after 12th but is dated 6th, is on there but not the recent one for 19/1499?

Regards

Steven Bainbridge
Principal Planning Manager

Email: steven@parkerplanningservices.co.uk
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Parker Planning Services Ltd,
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Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 05 July 2019 11:31
To: 'Jane Rodens'; 'Ben Woolnough'
Subject: RE: 19/1499 query

39

Good morning,

Could we please have a response to the two matters in the email below?

Regards

Steven Bainbridge
Principal Planning Manager

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Phone: 01284 336121

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Sent: 21 June 2019 15:11
To: 'Jane Rodens' <Jane.Rodens@eastsuffolk.gov.uk>; 'Ben Woolnough' <Ben.Woolnough@eastsuffolk.gov.uk>
Subject: 19/1499 query


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Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 04 July 2019 18:00
To: philip.ridley@eastsoffolk.gov.uk
Cc: Jason Parker
Subject: Urgent re planning application 19/1499 Rendlesham
Attachments: 19/1499 query (22.3 KB); Rendlesham 19/1499 legal note (191 KB); RE: DC/19/1499/FUL (44.4 KB)
Importance: High



Good afternoon Philip,

We apologise for bring this matter to your attention at such short notice, but in the absence of any recent correspondence from the case officer, our clients feel they have no choice but to bring the matter to your attention as we have not received feedback on the important matters that have been raised in recent weeks. Nonetheless the planning application deadline is this Monday.

One of the attached emails has a note of a legal consultation the applicants had with Mr. Paul Shadarevian QC on Friday 7th June, which preceded a meeting with officers on 12th June. The note has been agreed with Mr. Shadarevian. The note was discussed at the officer meeting on the 12th and as you can see was emailed to the case officer later the same day.

The QC, who said he holds you in high regard, has given the applicant's planning strategy a clean bill of health and has said that in his opinion the applicants have been "severely let down by the LPA".

Officers have said they will not be 'granting' any extension of time. Despite the applicants having made clear their willingness to agree an extension if one were requested. An attached email relates to this matter. As you can see the QC cautions the LPA against this course of action too, not least on costs grounds.

The applicants have heard nothing from the case officer since 12th June and, as mentioned above, the determination deadline is 8th July – this coming Monday.

The applicants have always remained positive and open to negotiate but, in their minds and in the opinion of the QC, they have not been well served by the LPA at any stage in the planning process. The applicants remain open to negotiation if the LPA remains willing, not least on design, which appears to be the officer's main sticking point.

The applicants would be grateful if you could consider the QC's advice in respect of the planning application but also the extension of time issue, and if the LPA could confirm their position, ideally before Monday 8th July.

Regards

Steven Bainbridge
Principal Planning Manager

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Phone: 01284 336121

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Sent: 21 June 2019 15:11
To: 'Jane Rodens'; 'Ben Woolnough'
Subject: 19/1499 query

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Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 12 June 2019 21:32
To: 'Jane Rodens'
Cc: ~~ay.kiering@eastuffell.co.uk~~
Subject: Rendlesham 19/1499 legal note
Attachments: PS QC meeting note 07 06 19 final.pdf

Importance: High

Ms. Rodens,

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If the LPA agrees that *"that it would be proper, in the circumstances, to do so"*, we would suggest the LPA request an extension of time from the applicants to at least 8th September 2019 to allow further discussion and consideration of design matters (such as those discussed today), amendments to be submitted and reconsulted on and for the LPA to then reconsider the planning balance before getting to a 'minded to' position a second time.

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Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 07 June 2019 16:39
To: 'Jane Rodens'
Cc: ray.herring@eastsuffolk.gov.uk
Subject: RE: DC/19/1499/FUL

Good afternoon Jane,

Further to your email below, as you know we are meeting at the Council offices next week and Ward Councillor Herring has asked to attend, which we think is essential.

In an earlier email I referred you to the fact the applicants were taking Counsels advice – the email I got back indicates, I hope, that you simply missed that reference.

In any event, the applicants met today with Mr. Paul Shadarevian QC (you may not know he defended SCDC's Core Strategy in the High Court) and we can discuss the implications of this on Wednesday.

Suffice it to say though, and as we had suggested last time, we would again strongly suggest a senior member of planning staff attend that meeting with you.

So to confirm it is on Wednesday 12th June at 10am. Have a good weekend.

Regards

Steven Bainbridge
Principal Planning Manager

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Phone: 01284 336121

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From: Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Sent: 03 June 2019 15:59

Steven Bainbridge

From: Ben Woolnough <Ben.Woolnough@eastsuffolk.gov.uk>
Sent: 05 July 2019 11:45
To: Steven Bainbridge
Cc: Philip Ridley; Liz Beighton; Katherine Scott; Jane Rodens
Subject: RE: Urgent re planning application 19/1499 Rendlesham

41

Dear Steven,

Philip is out of the office today though he has read your email and has asked me to respond on his behalf. I also note your email on the LLFA response and will ask Jane to update you on this.

I take on board your points and as per our discussion on 13th June, following your meeting, and your notes of legal advice (shared after that meeting) are noted. It is however not our responsibility to address your legal advice, that is yours to influence how to proceed with the application. The report will however cover comprehensive considerations picked up in that note. Jane has kept us informed of the progress of the application and was also on leave for a week after your meeting. I note that your email of Wed 12/06/2019 21:32 does not specifically pose questions but suggests the LPA drops its refusal to agree an extension of time. I was clear in our conversation that the LPA maintains its position on this.

I believe Jane has been clear through the previous application, pre-application advice and current application on a number of fundamental issues with this scheme. Important advice previously provided by the Local Planning Authority has not been fully incorporated in the submitted scheme or any recent amendments. From my review the content of the application falls short even if the design was acceptable, particularly in respect of information to address odour issues, the measures required for Habitats Regulations mitigation and the approach to the delivery of affordable housing.

I can reassure you that this application has received considerable input over the past few months from a wide range of senior members of the planning team and Philip has been briefed on its progress throughout. We are all in agreement that there are substantial shortfalls which both fail to make this acceptable and prohibit us from agreeing an extension of time to enable them to be addressed. I note the suggestion of a costs claim in the event of an appeal but the Council is meeting its requirement to determine applications in a timely manner and not agreeing an extension of time to address amendments (highlighted at previous stages) is not unreasonable behaviour to justify any such claim.

We are currently finalising the report and the intention is to issue the decision under delegated powers on Monday.

I trust you find this feedback of assistance.

Kind regards

Ben



Ben Woolnough BSc MSc MRTPI
Major Sites and Infrastructure Manager
East Suffolk Council
01394 444593 | 07833 406681

www.eastsuffolk.gov.uk

East Suffolk Council is a new district authority which, from April 2019, delivers services for the residents, businesses and

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 05 July 2019 12:54
To: 'Ben Woolnough'
Cc: 'Philip Ridley'; 'Jane Rodens'
Subject: RE: Urgent re planning application 19/1499 Rendlesham

42

Dear Ben,

Thank you for your email. The matters you have raised from your review could be resolved within the bounds of this planning application. In terms of design the applicants have made abundantly clear their willingness to discuss this matter further. It is the Council who have been effectively silent since 12th June; closing the door on any further submissions on design grounds within the bounds of this application and thus potentially avoiding the need for the appeal altogether. We now await the decision notice and officer's report.

Regards

Steven Bainbridge
Principal Planning Manager

Email: steven@parkerplanningservices.co.uk
Phone: 01284 336121

www.parkerplanningservices.co.uk
Chartered town planners & multi-disciplinary specialists



Norfolk Office:
Parker Planning Services Ltd,
Orchard House,
Hall Lane, East Tuddenham.
Norfolk. NR20 3LR
Phone: 01603 516319

Suffolk Office:
Parker Planning Services Ltd,
Northgate Business Centre,
10 Northgate Street, Bury St Edmunds,
Suffolk. IP33 1HQ
Phone: 01284 336348

Essex Office:
Parker Planning Services Ltd,
Moulsham Mill, Parkway,
Chelmsford,
Essex. CM2 7PX
Phone: 01245 934184

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From: Ben Woolnough <Ben.Woolnough@eastsuffolk.gov.uk>
Sent: 05 July 2019 11:45
To: 'steven@parkerplanningservices.co.uk' <steven@parkerplanningservices.co.uk>
Cc: Philip Ridley <Philip.Ridley@eastsuffolk.gov.uk>; Liz Beighton <Liz.Beighton@eastsuffolk.gov.uk>; Katherine Scott <Katherine.Scott@eastsuffolk.gov.uk>; Jane Rodens <Jane.Rodens@eastsuffolk.gov.uk>
Subject: RE: Urgent re planning application 19/1499 Rendlesham

Dear Steven,

Appendix 4 2019 Odour Assessment

 air quality & monitoring site odour assessment odour dispersion modelling dust monitoring bioaerosol monitoring scentroid equipment

Air Spectrum Environmental Limited

Spectrum Environmental Support

Spectrum House
Checketts Lane
Checketts Lane Industrial Estate
Worcester
WR3 7JW

Aidan Wrynne
Pete Badham

Odour Impact Assessment Capital Community Developments

Anthony Hardy

30 Gardenia Close
Rendlesham
Woodbridge
IP12 2GX

JL 20471
Version 1.0

14/09/2019

 odour lab odour threshold analysis odour management

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ABBREVIATIONS

ASE	Air Spectrum Environmental Limited
BS EN	British Standard European Norm
DEFRA	Department for Environment, Food & Rural Affairs
EA	Environment Agency
IPPC	Integrated Pollution Prevention and Control
NPPF	National Planning Policy Framework
SES	Spectrum Environmental Support
STW	Sewage Treatment Works
UKWIR	UK Water Industry Research
WWTW	Waste Water Treatment Works

EXECUTIVE SUMMARY

Air Spectrum Environmental Ltd (ASE), were commissioned By Capital community developments to undertake an odour dispersion modelling assessment to evaluate the potential odour impact of a Sewage Treatment Works on a proposed site development by Capital Community Developments situated near Jays Croft Road, Rendlesham, Woodbridge IP12 2TQ.

Data entered within the dispersion model was based upon odour emissions data supplied and verified by Anglian Water.

The results of this assessment indicate that ground level odour concentrations at the proposed residential development are well below the $1.5 \text{ ou}_E/\text{m}^3$ 98th percentile (hourly average) limit. Therefore, based on the findings within this assessment, it appears that the proposed residential development would not be subjected to odour nuisance from the STW site.

1.0 INTRODUCTION

1.1 Background

Air Spectrum Environmental Ltd (ASE), were commissioned to undertake an odour dispersion model of a proposed site development by Capital Community Developments situated near Jays Croft Road, Rendlesham, Woodbridge IP12 2TQ. Data entered within the dispersion model was based upon emission data for the Rendlesham Sewage Treatment works, which was supplied by Anglian Water.

Capital Community Developments propose to develop the site into a residential area and have procured ASE to report on the impacts of the odour release from the adjacent STW. The STW is situated to the North of the development in Rendlesham. During the planning stages, concerns have been raised about the off-site odours which may cause nuisance to the future residents of the development.

To assess the risk that off-site odours may cause a nuisance to the future residents of the development, ASE has completed an odour impact assessment for the odour sources identified. ADMS 5 software was used to prepare the dispersion model to quantify the odour risk to the planned development. Figures 1 & 2 display the planned development site and the adjacent STWs.



Figure 1 - Planned Development site layout (2019)

Figure 2 below displays the development site boundary in relation to the sewage treatment works and cordon sanitaire zone.

Figure 2 - Development site boundary in relation to the STW & Cordon Sanitaire Zone



1.2 Limitations

Air Spectrum Environmental Limited has prepared this report for the sole use of the client, showing reasonable skill and care, for the intended purposes as stated in the agreement under which this work was completed.

The report may not be relied upon by any other party without the express agreement of the client. No other warranty, expressed or implied is made as to the professional advice included in this report.

Where any data supplied by the client or from other sources have been used it has been assumed that the information is correct. No responsibility can be accepted by ASE for inaccuracies in the data supplied by any other party. The conclusions and recommendations in this report are based on the assumption that all relevant information has been supplied by those bodies from whom it was requested.

No part of this report may be copied or duplicated without the express permission of ASE and the client.

Where field investigations have been carried out these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the Safety, Health, Environment and Quality Management System of ASE.

2.0 REGULATORY GUIDANCE

2.1 Odour guidance and legislation

There are currently no statutory standards or regulations in the UK for the release and subsequent impacts of odours. This is due to the complexities involved with measuring and assessing odours against compliance criteria, and the inherent subjective nature of odours.

It is recognised that odours have the potential to pose a nuisance for residents living near a source of offensive odour. In these cases, determination of whether or not an odour constitutes a statutory nuisance is usually the responsibility of the local planning authority or the Environment Agency. The Environmental Protection Act 1990 (Stationery Office, 1990) outlines that a local authority can require measures to be taken where:

“Any dust, steam, smell or other effluvia arising on an industrial, trade and business premises and being prejudicial to health or a nuisance...” or

“fumes or gases are emitted from premises so as to be prejudicial to health or cause a nuisance...”

Within the Environment Agency H4 Guidance on Odour Management there are benchmark levels of odour on the site boundary dependent on its offensiveness, ranging between C98, $1.5 \text{ ou}_E/\text{m}^3$ and C98, $1 \text{ hour } 6 \text{ ou}_E/\text{m}^3$. This is due to variations in an odours apparent offensiveness and a receptors sensitivity.

The benchmarks are:

- 1.5 odour units for most offensive odours
- 3 odour units for moderately offensive odours
- 6 odour units for less offensive odours.

2.2 National Planning Policy

The National Planning Policy Framework (NPPF) was published in March 2012. This sets out the Government’s planning policies for England and how they are expected to be applied. In relation to conserving and enhancing the natural environment, paragraph 109 states that:

“The planning system should contribute to and enhance the natural and local environment by..... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.”

Pollution is defined by the NPPF as:

“Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.”

2.3 Odour measurement

Odour exposure and impact can be measured via two methods; by specific compound measurement or; by total odour by dynamic dilution olfactometry.

Specific gas measurement is often used when an emission from a site is dominated by an individual odorous compound, such as hydrogen sulphide at a Waste Water Treatment Works (WWTW). Monitoring of the odorous compound, both at its source and receptor location, can provide a simple evaluation of the odour emission.

Total odour by dynamic dilution olfactometry determines the odour threshold for a complex mixture of chemicals. Odour threshold is a measurement of concentration for an odorous gas. The measurement is achieved by presenting a dilution range of the test gas to a panel of acuity assessed panellists. Panellists indicate when they can detect an odour or not, at each dilution range presented. The detection point is the dilution at which 50 % of the panel can detect an odour, which in turn represents an odour concentration of 1 ou_E/m³. The test sample odour concentration is calculated by multiplying detection concentration (1 ou_E/m³) by the dilution required to achieve detection point. Odour threshold is measured in accordance with BS EN 13725:2003¹ "Determination of odour concentration by dynamic Olfactometry". Once threshold analysis is completed it gives the point of detection of the odour and its apparent strength in ou_E/m³.

For the purposes of this model the odour emission values were given by Anglian Water.

2.4 UK case law

The most commonly applied criterion in relation to odour assessment is the 'Newbiggin criterion'. This criterion was originally introduced into a public inquiry for a new sewage works at Newbiggin-by-the-sea in 1995, defended by Northumbrian Water Limited. It equates to an odour exposure level of 5 European odour units per cubic meter (C98, 1 hour > 5 ou_E/m³). The Newbiggin criterion has been successfully applied during numerous planning and nuisance assessment studies since 1995, for sewage, waste, food and a range of other industrial and agricultural activities.

These indicative criteria aim to differentiate between odours of different offensiveness, and range from C98, 1 hour > 1.5 ou_E/m³ (for highly offensive odours) to C98, 1 hour > 6 ou_E/m³ (for low offensive odours). It should be noted that the sewage treatment sector does not currently fall under the IPPC regime and that these criteria are based on relatively limited data and have not undergone any robust validation in terms of their applicability to the sewage treatment sector in the UK.

The comparison of odour exposure levels generated by the works before and after completion of the proposed sludge dewatering schemes was focused on the Newbiggin criterion (C98, 1 hour = 5 ou_E/m³), and the most stringent EA criterion (C98, 1 hour = 1.5 ou_E/m³).

¹ BS EN 13725:2003 Air Quality – Determination of Odour Concentration by Dynamic Olfactometry

Table 1 Newbiggin criterion

Relative Offensiveness	Indicative Criteria
High	1.5 ou _E /m ³ 98 th percentile (hourly average)
Medium	3 ou _E /m ³ 98 th percentile (hourly average)
Low	6 ou _E /m ³ 98 th percentile (hourly average)

2.5 UK Water Industry Research

A published study by the UK Water Industry Research (UKWIR)² detailed the correlation between the modelled odour impact areas with receptor responses. Published in 2001 the document shows from a study of 9 wastewater treatment works, how the complaints vary:

- At C98, 1 hour 5ou_E/m³ – complaints rare; 3% registered
- Between C98, 1 hour 5ou_E/m³ and C98, 1 hour 10ou_E/m³ – increase in complaints; 38% registered
- Above C98, 1 hour 10ou_E/m³ – significant increase in complaints; 59% registered.

2.6 DEFRA compost guidance

The compost guidance in 2009 relating to good practise and odour control for composting sites (excluding those processing slaughterhouse waste) gives C98, 1 hour 3ou_E/m³ as an odour impact criteria taken from dispersion modelling.

² Odour Control in Wastewater Treatment – A Technical Reference Document. Ref 01/WW/13/3 – UKWIR, 2001
Page **10** of **21**

3.0 IMPACT ASSESSMENT METHOD

3.1 Odour emission sources

A desktop study revealed two potential odour sources which are in close proximity to the proposed development site at Rendlesham. Firstly, the Anglian Water STW to the North of the development site and secondly, the Stokes Sauces factory to the North-East. Within this study only the STW has been considered in the dispersion model. The sauce factory has been omitted because the operation is small and is deemed to have negligible effect.

The odour emission data used in the dispersion model was supplied and verified by Anglian Water. This data is presented in table 2 below.

Table 2 Odour Emission Data

Name	Shape	No	L (m)	W (m)	Dia (m)	Elev (m AOD)	Area (m ²)	Emission rate (ou _E /m ² /s)	Comments
Inlet works reception chamber	circular	1	N/A	N/A	1.5	27	1.8	50	UKWIR: typical rate to reflect pumped flow
Screenings skip	rectangular	1	3	2	N/A	27	6.0	20	AW internally derived from model library
Screen chamber	rectangular	1	10	2.5	N/A	30	25.0	20	UKWIR: low rate to reflect low risk of septicity
Balance tank	circular	1	N/A	N/A	15	30	176.6	0.8	Use UKWIR low rate for PST to reflect diffused air and no settlement
Bio-bubble reactor 1	circular	1	N/A	N/A	13	32	132.7	4	Use UKWIR typical rate for activated sludge plant
Bio-bubble reactor 2	circular	1	N/A	N/A	13	32	132.7	4	Use UKWIR typical rate for activated sludge plant
Bio-bubble desludging chambers	rectangular	2	1	1	N/A	27	2.0	140	Use UKWIR low rate for agitated raw sludge to reflect aerobic process
Sludge storage tank	circular	1	N/A	N/A	3	29	7.1	40	Use UKWIR low rate for quiescent raw sludge to reflect aerobic process
New sludge storage tank	circular	1	N/A	N/A	7.5	29	44.2	40	Use UKWIR low rate for quiescent raw sludge to reflect aerobic process
Wash water storage tank	circular	1	N/A	N/A	7.5	0.3	44.2	0.3	Use UKWIR low rate for final tank
Attenuation tank	Circular	1	N/A	N/A	7.5	0.3	44.2	0.3	Use UKWIR low rate for final tank

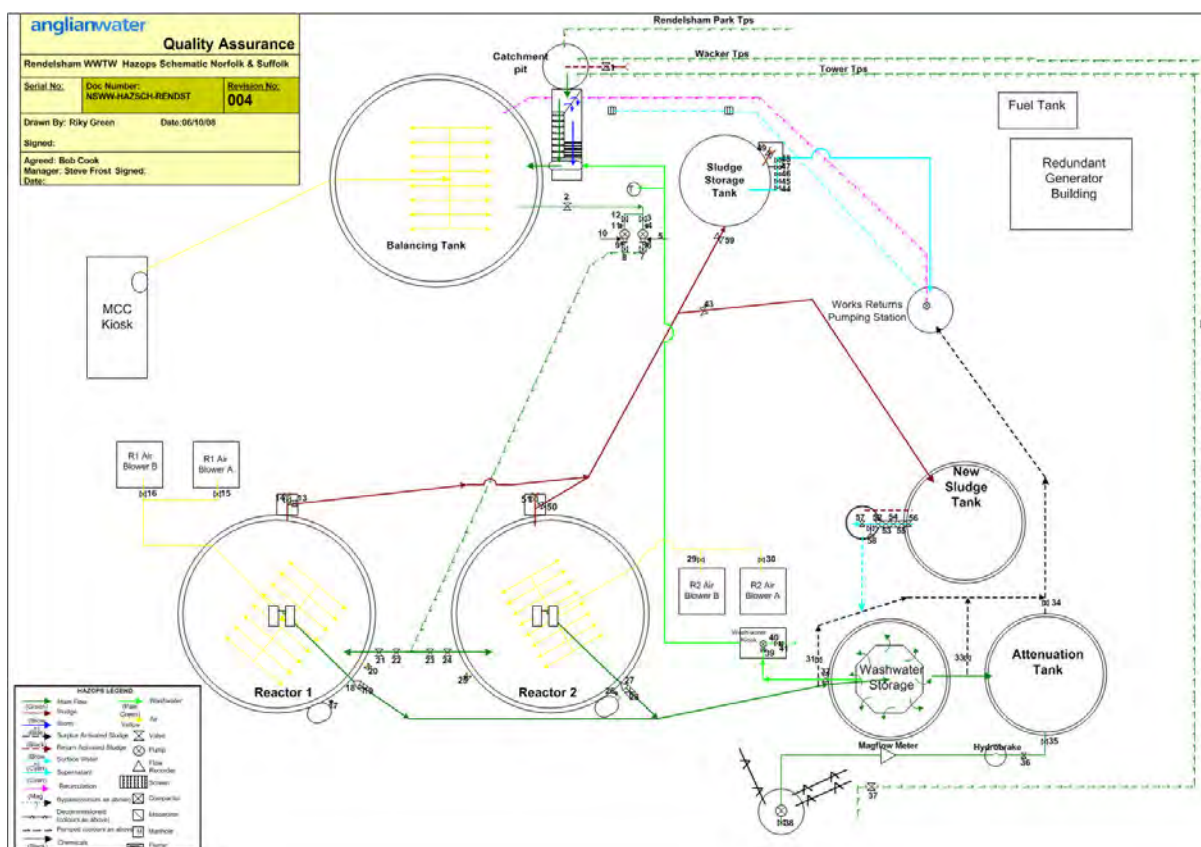


Figure 3 Rendlesham STW Site Schematic

3.2 Receptor locations

Within this assessment 4 receptor locations have been used to predict ground level odour concentration across the planned site. The receptor locations have been chosen to represent two locations within the cordon sanitaire zone of the site and two further locations situated in other areas of the site.



Figure 4 – Receptor location map

Table 3 Receptor locations

Receptor		Location	
		x	y
R1	Northern edge of cordon sanitaire	633813	253868
R2	Westerly section of cordon sanitaire	633769	253840
R3	Western area of development site	633603	253811
R4	Centre of development site	633738	253717

3.3 Meteorological data

The relevant meteorological data used was from Wattisham, following discussions with the data provider. The proposed site is approximately 30 km from the weather station and contained all relevant weather parameters used within the model for the 5 years' worth of data required. The years covered in this assessment are 2014-2018.

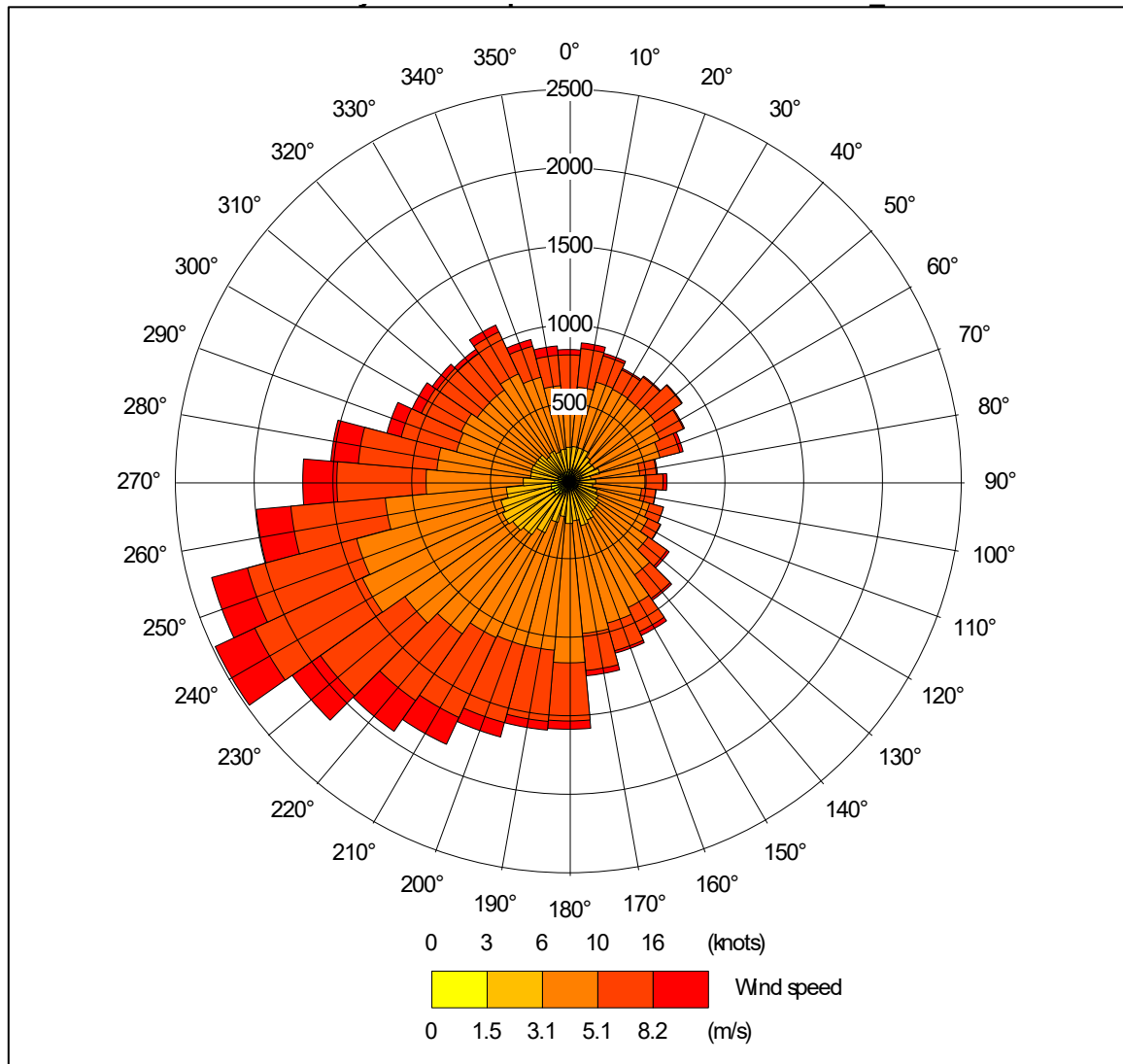


Figure 5 Windrose data for Wattisham 2014-2018

3.4 Dispersion model inputs

The dispersion model was run using the input parameters which are detailed in Table 4.

Table 4 Model input parameters

Parameter	Source Type	Central Location		Emission Velocity	Flow Rate	Total Emission Rate
		x	y	m/s	m ³ /s	OU _E /s
Inlet works Reception Chamber	Point	633806	253927	0.1	0.177	90
Screenings Skip	Line	633823 633827	253922 253922	0.1	0.079	20
Screen Chamber	Line	633806 633804	253925 253916	0.1	0.079	60
Balance Tank	Area	633796 633803 633793 633788	253930 253920 253918 253925	0.1	17.671	2.4
Bio-bubble reactor 1	Point	633783	253899	0	0	12
Bio-bubble reactor 2	Point	633801	253897	0	0	12
Bio-bubble desludging chambers	Point	633779 633791	253911 253907	0.1	0.079	420 420
Sludge Storage Tank	Point	633813	253919	0.1	0.707	120
New Sludge Storage Tank	Point	633822	253904	0.1	4.418	120
Wash water Storage Tank	Point	633819	253892	0.1	4.418	1.2
Attenuation Tank	Point	633829	253895	0.1	4.418	1.2

All input locations are based on estimates made using satellite images and cannot be verified as being accurate. All sources have been modelled to emit 24 hours a day to ensure worst case scenario is predicted.

3.5 Dispersion model scenarios

To characterise the impact of the odour emissions from the STW, a single scenario was modelled:

- Scenario 1 – All sources considered. No near field buildings included (including proposed buildings) and odour emission rates as defined in Table 4.

3.6 Modelling software

The site information was input into ADMS to determine the relationship between the STW and the proposed development land. Emission data and meteorological data was then fed into the model to enable prediction of the level of exposure to odours at locations surrounding the site under the normal operational regime for the facility. The results of the modelling are presented in the form of contours (or isopleths - lines connecting points with equal frequency of occurrence) for a 1-hour average limit concentration of x_{ouE}/m^3 as a 98% (percentile) ($C98, 1\text{ hour} = X_{ouE}/m^3$) which defines the area where odour nuisance may occur.

ADMS³ is a state-of-the-science dispersion modelling system that simulates essential atmospheric physical processes and provides refined concentration estimates over a wide range of meteorological conditions and modelling scenarios. It is based on atmospheric boundary layer turbulence structure and scaling concepts, including treatment of multiple ground-level and elevated point, area and volume sources. It handles flat or complex, rural or urban terrain and includes algorithms for building effects and plume penetration of inversions aloft. It uses Gaussian dispersion for stable atmospheric conditions (*i.e.*, low turbulence) and non-Gaussian dispersion for unstable conditions (high turbulence).

ADMS includes two data pre-processors for streamlining data input. A meteorological pre-processor, computes boundary layer and other necessary parameters for use with ADMS and uses standard hourly sequential data supplied from the UK Met Office. There is also a terrain pre-processor option that simplifies the computation of receptor elevations and effective height scales for numerous types of digital data formats, including OS Landform Panorama digital terrain maps. The model is considered appropriate by the UK Environment Agency for assessments of the nature described in this report

³ Software used: ADMS 5.1 model version: 5.1.2.0.

3.7 Odour impact assessment criteria

The objective of this assessment was to establish whether the odour emissions resulting from the STW at Rendlesham would result in predicted odour nuisance at the proposed residential development.

Taking into consideration the guidance discussed we assume that sensitive receptors would be able to detect odour resulting from the STW at between 1.5 - 3 ou_E/m³, and odours above 3 ou_E/m³ 98th percentile would cause nuisance.

3.8 Odour modelling uncertainties

Uncertainty in dispersion modelling predictions can be associated with a variety of factors, such as:

- **measurement error** – error in input data, including emission estimates, operational procedures, land use characteristics and meteorology which can be detected and corrected;
- **systematic error** – unnoticed error which may occur during the sampling (data collection);
- **model uncertainty** – model limitations and assumptions based on which it was computed;
- **inherent randomness** – knowledge of starting conditions does not result in certainty related to the final modelling outcome;
- **natural variation** – change in time and place in natural systems;
- **subjective judgement** – data interpretation, especially when data is scarce.

Potential uncertainties in the model results were minimised as far as practicable and worst-case inputs used to provide an accurate assessment. This included the following:

- choice of model - ADMS-5 is a commonly used atmospheric dispersion model and results have been verified through a number of studies to ensure predictions are as accurate as possible; in the UK odour assessments are almost exclusively undertaken using the ADMS or AERMOD models;
- meteorological data - modelling was undertaken using meteorological data set from an observation site within 30 km of the facility to take account of local conditions; a few years of data minimise the risk of inclusion of abnormal weather conditions;
- plant operating conditions - SES have attempted to model information in the worst-case scenario, where all considered odour sources emit constantly;
- emission rates - emission rates were derived from monitoring undertaken at similar facilities. As such, they are considered to be representative of potential releases during normal operation;

-
- sensitive receptor locations - a Cartesian grid was included in the model to provide suitable data for contour plotting. Receptor points were also included at sensitive locations to provide additional consideration of these areas; and,
 - variability - all model inputs are as accurate as possible and worst-case conditions were considered as necessary to ensure a robust assessment of potential pollutant concentrations.

Results were considered in the context of the relevant odour benchmark level and IAQM criteria. It is considered that the use of the stated measures to reduce uncertainty and the use of worst-case assumptions when necessary has resulted in model accuracy of an acceptable level.

4.0 CONTOUR MAPS

Within this section the long term 98th percentile ground level odour concentrations are presented as a contour map overlayed over a base map of the local area. The colour graded key represents ground level odour concentrations ($C_{98, 1\text{-hour}} \times \text{ou}_E/\text{m}^3$) at the specific point with odour concentrations increasing as the colour turns yellow to red.

4.1 Long term 98th percentile odour concentrations as a result of normal operations of the Anglian Water STW.

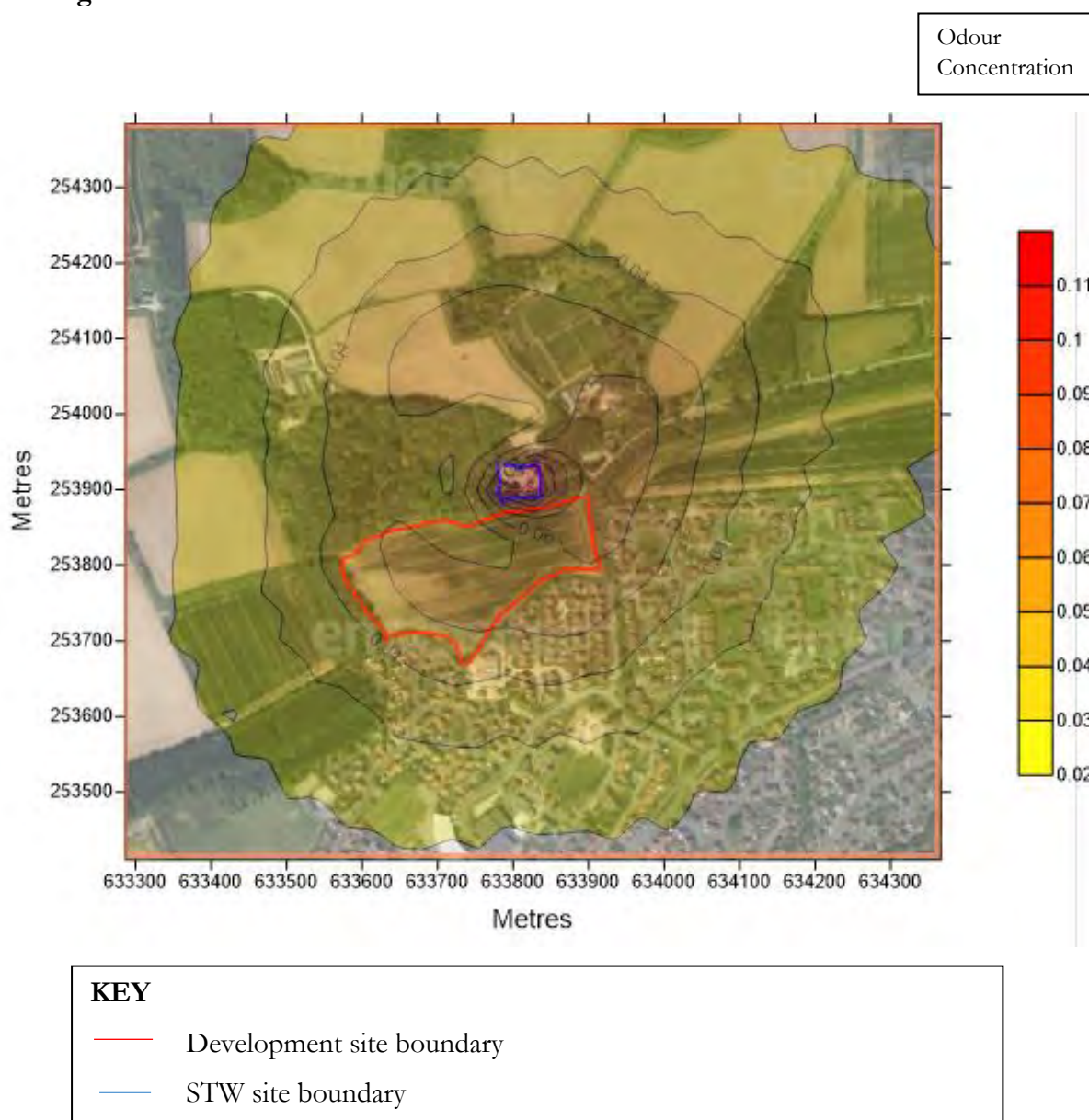


Figure 6 Ground Level Odour Concentrations - Scenario 1

5.0 ASSESSMENT OF IMPACTS

Based on the findings within this assessment, it appears that the proposed residential development would not be subjected to odour nuisance from the STW site.

Table 5 details the ground level odour concentrations for the scenario that has been run in ADMS. Where odour levels fall above $C98, 1 \text{ hour} = 1.5 \text{ ou}_E/\text{m}^3$ the table cell is highlighted in pink, indicating the likely chance of odour nuisance at that receptor.

Table 5 Receptor ground level odour concentrations

Receptor Name	Ground Level Concentration ($C98, 1 \text{ hour} \times$ ou_E/m^3) Scenario 1	Odour nuisance benchmark level (ou_E/m^3)
R1 – Northern section of cordon sanitaire zone	0.072	1.5
R2 – Wester section of cordon sanitaire zone	0.050	
R3 – Western area of whole development site	0.048	
R4 – Central area of whole development site	0.051	

The predicted long-term 98th percentile odour concentrations at the receptors located within the cordon sanitaire zone were all considerably lower than the benchmark odour nuisance limit of $1.5 \text{ ou}_E/\text{m}^3$. The maximum long-term 98th percentile odour concentration that was predicted throughout the whole of the modelled area was $0.12 \text{ ou}_E/\text{m}^3$. This again is below the benchmark odour nuisance limit of $1.5 \text{ ou}_E/\text{m}^3$.

The findings from this assessment, indicate that the future occupants of the proposed development site would not be subject to odour nuisance. However, the odour emission measurements which were supplied by Anglian Water may be greater or less than what has been modelled.

APPENDIX

BS EN 13725:2003 Air Quality – Determination of Odour Concentration by Dynamic Olfactometry

Odour Control in Wastewater Treatment – A Technical Reference Document. Ref 01/WW/13/3 – UKWIR, 2001

Software used: ADMS 5.1 model version: 5.1.2.0.

Steven Bainbridge

Subject: FW: Pre-Planning Assessment Report ref 00025173 of 15 December 2017

From: Lyon Richard <r[REDACTED]>
Sent: 21 November 2019 08:25
To: 'CC Developments' <a[REDACTED]>
Cc: Shafibeik Omid <o[REDACTED]>
Subject: RE: Pre-Planning Assessment Report ref 00025173 of 15 December 2017

Good morning Anthony

We have now completed our review of the data and I can confirm that our analysis concurs with the conclusions of the report issued by Air Spectrum Environmental Ltd on 14th September'19.

Consequently, we can accept that the amenity of the development as currently proposed, is unlikely to be impaired by the emissions of odour or noise that would be anticipated from the normal operation of the Rendlesham WRC.

Regards

Richard Lyon
Pre-development Senior Engineer
Development Services

Anglian Water Services Limited
Thorpe Wood House, Thorpe Wood,
Peterborough, Cambridgeshire, PE3 6WT
Mobile: 07885 135404
www.anglianwater.co.uk

From: CC Developments <a[REDACTED]>
Sent: 05 November 2019 14:27
To: 'Lyon Richard' <r[REDACTED]>
Cc: 'Shafibeik Omid' <o[REDACTED]>
Subject: Pre-Planning Assessment Report ref 00025173 of 15 December 2017

Dear Richard,

Thankyou for revisiting the extent of the buffer zone or cordon sanitaire in the light of the more recent Air Spectrum odour assessments of May 2018 and September 2019. If you require any more information please let us know.

Best regards
Anthony Hardy
Capital Community Developments

From: Lyon Richard <r[REDACTED]>
Sent: 31 October 2019 09:51
To: 'CC Developments' <a[REDACTED]>
Cc: Shafibeik Omid <o[REDACTED]>
Subject: RE: Pre-Planning Assessment Report ref 00025173 of 15 December 2017

Good morning Anthony

Sorry I missed your call yesterday. I left a message earlier today to advise that our senior modeller is reviewing the Air Spectrum analysis.

I expect to have his conclusions tomorrow and will advise you on our position as soon as I've received this.

Regards

Richard Lyon

Pre-development Senior Engineer
Development Services

Anglian Water Services Limited

Thorpe Wood House, Thorpe Wood,
Peterborough, Cambridgeshire, PE3 6WT
Mobile: 07885 135404
www.anglianwater.co.uk

From: CC Developments [mailto:ccdevelopments@anglianwater.co.uk]
Sent: 30 October 2019 17:05
To: Lyon Richard
Cc: Olim Sandra
Subject: Pre-Planning Assessment Report ref 00025173 of 15 December 2017

EXTERNAL MAIL - Please be aware this mail is from an external sender - **THINK BEFORE YOU CLICK**

Dear Richard,

Sandra Olim referred our enquiry to you, see email below. We are in the process of acquiring and developing the land to the south of the Water Recycling Centre at Rendlesham Park, sometimes referred to as Site SSP12. In recent years Anglian Water has recommended a buffer zone or cordon sanitaire of 110 m radius from the centre of the Water Recycling Centre at Rendlesham Park, but this was based on an odour assessment carried out by Air Spectrum in February 2014.

Air Spectrum have carried out two further odour assessments in May 2018 and September 2019, copies attached, and there has been a dramatic improvement in the level of odour nuisance - from 0.5 to 2.0 OUE per m3 in February 2014 to 0.055 OUE per m3 in September 2019, which is more than 20 times below the threshold of 1.5 OUE per m3.

Would it be possible to review the buffer zone in the light of the more recent odour assessments of 2018 and 2019?

Best regards
Anthony Hardy
Capital Community Developments

From: Olim Sandra <solim@anglianwater.co.uk>
Sent: 17 October 2019 12:01
To: 'CC Developments' <ccdevelopments@anglianwater.co.uk>

Cc: 'Leigh@amazi.co.uk' [REDACTED]
Subject: RE: Pre-Planning Assessment Report ref 00025173 of 15 December 2017

Dear Mr Hardy

Thank you for your email.

I have arranged a call back to be made to you by our Senior Engineer Richard Lyon to discuss this with you. Our Senior Engineer Richard can be contacted on: rLyon@anglianwater.co.uk and on 07885135404

Kind Regards

Sandra Olim
Pre-Development Advisor
Development Services
Anglian Water Services Limited
Telephone Office: 03456066087 Option 1
Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT
<https://www.anglianwater.co.uk/developers/pre-development.aspx>

From: CC Developments [REDACTED]
Sent: 16 October 2019 16:54
To: Planning Liaison
Cc: Leigh Parratt
Subject: Pre-Planning Assessment Report ref 00025173 of 15 December 2017

EXTERNAL MAIL - Please be aware this mail is from an external sender - THINK BEFORE YOU CLICK

Reminder

From: CC Developments <[ah\[REDACTED\]](mailto:ah[REDACTED])>
Sent: 03 October 2019 22:24
To: 'planningliaison@anglianwater.co.uk' <planningliaison@anglianwater.co.uk>
Cc: Leigh Parratt <Leigh@amazi.co.uk>
Subject: Pre-Planning Assessment Report ref 00025173 of 15 December 2017

Dear Sandra/Planning Liaison,

In your email of 15 December 2017 to Leigh Parratt of Amazi Consulting you recommend a buffer zone of 110 m from the centre point of the Rendlesham WRC, which is about 70 m from the southern boundary of the WRC, based on an odour assessment in 2014, ref email and diagram below.

Air Spectrum carried out three odour assessments in February 2014, May 2018, and September 2019, copies attached. There has been a dramatic improvement in the level of odour nuisance. The results in February 2014 were in the range 0.5 to 2.0 OUE (European Odour Units per m3). The results in September 2019 are an average of 0.055 OUE, more than 20 times below the threshold of 1.5 OUE. Air Spectrum conclude:

The results of this assessment indicate that ground level odour concentrations at the proposed residential development are well below the 1.5 OUE/m3 98th percentile (hourly average) limit. Therefore, based on the

findings within this assessment, it appears that the proposed residential development would not be subjected to odour nuisance from the STW site.

We are residents of Rendlesham. There were indeed issues with odour nuisance in 2017 and the residents brought this to the attention of Nigel Minter at Anglian Water. Nigel investigated the matter and on 13 December 2017 replied: *Our investigations into the sewerage network in Rendlesham we found that high levels of septic sewerage were being discharged into our network from a private pumping station. We also discussed possible issues at the Rendlesham works which may be a cause for odours.* Nigel and the team took action and the situation definitely improved. This may explain the high levels of odour nuisance in 2014-17, and the lower levels in 2018 and 2019.

Your recommended buffer zone is based on the odour assessment of 2014. Please could we ask you to review this buffer zone in the light of the more recent odour assessments of 2018 and 2019.

Best regards
Anthony Hardy
Capital Community Developments
30 Gardenia Close, Rendlesham
Woodbridge IP12 2GX

Appendix 5 Local Plan Hearing Matter Note

Suffolk Coastal Local Plan Examination

Hearing Day 2

Matter 2C – Distribution of Growth and the Settlement Hierarchy – Whether the plan sets out a clear strategy for the pattern of development consistent with national policy

Strategic and Non-Strategic Policies

1. This note responds to an action arising in the hearing session on Matter 2C (Wednesday 21st August) and the Inspector's questions about Strategic and Non-Strategic Policies.
2. The Council has reconsidered the policies within the Final Draft Local Plan in the context of the National Planning Policy Framework (paragraphs 20-30). In doing so the Council has identified strategic policies as being those which contribute to the overall pattern, scale and quality of development, as per paragraph 20 of the NPPF. Policies which relate only to the local level or which set out specific development management criteria, and which do not form a part of the overall pattern, scale and quality of development, have been identified as Non-Strategic. The policies listed below are considered to be Non-Strategic:

Policy Reference	Policy Name
SCLP4.10	Town Centre Environments
SCLP5.5	Conversion of buildings in the countryside for housing
SCLP5.6	Rural Workers Dwellings
SCLP5.13	Residential Annexes
SCLP5.14	Extensions to residential curtilages
SCLP6.5	New Tourist Accommodation
SCLP6.6	Existing tourism accommodation

SCLP8.3	Allotments
SCLP8.4	Digital Infrastructure
SCLP11.2	Residential Amenity
SCLP11.4	Listed Buildings
SCLP11.5	Conservation Areas
SCLP11.6	Non-Designated Heritage Assets
SCLP11.7	Archaeology
SCLP11.9	Areas to be Protected from Development
SCLP11.10	Newbourne – Former Land Settlement Association Holdings
SCLP12.11	Felixstowe Ferry and Golf Course
SCLP12.12	Felixstowe Ferry Golf Club to Cobbolds Point
SCLP12.13	Cobbolds Point to Spa Pavilion
SCLP12.14	Spa Pavilion to Manor End
SCLP12.15	Manor End to Landguard

3. In identifying a number of non-strategic policies, it is necessary to propose modifications to paragraphs 1.33, 1.46 and 12.7, as set out below, and to include an Appendix M which lists which policies are Strategic and which are Non-Strategic. The NPPF (paragraph 21) states that plans should make explicit which policies are strategic policies. Modifications are shown in ~~strikethrough~~ for deleted text and in underline for additional text.

Paragraph 1.33:

“The Local Plan sets out the level of growth which needs to be planned for in Suffolk Coastal and identifies where this should be located and how it should be delivered. The Plan sets out the strategic and non-strategic planning policies which the Council will use to determine planning applications across Suffolk Coastal, along with policies in made Neighbourhood Plans. This Local Plan will cover the period 2018-2036.”

Paragraph 1.46:

“~~All~~Many of the policies in the Local Plan are ‘strategic policies’(as set out in Appendix M). This means that policies and proposals within future Neighbourhood Plans should be in general conformity with these policies. ~~The p~~Policies in the Plan do provide flexibility for Neighbourhood Plans to develop their own locally specific policies and in a number of policies there is specific reference to the types of policies that Neighbourhood Plans may choose to include. However, Neighbourhood Plans may cover other topics and provide local detail in relation to other policy areas where appropriate.”

Paragraph 12.7:

“In accordance with the National Planning Policy Framework, the Local Plan identifies policies which are strategic and those which are not strategic. All~~Many of~~ the policies in the Local Plan are ‘strategic policies’, and these policies together set the overall strategy for the pattern, scale and quality of development. This means that~~In meeting the ‘basic conditions’ for Neighbourhood Plans,~~ policies and proposals within future Neighbourhood Plans should be in general conformity with these policies. The pPolicies in the Plan ~~do provide flexibility for Neighbourhood Plans to develop their own locally specific policies and in a number of policies there is specific reference to the types of policies that Neighbourhood Plans may choose to include. However, Neighbourhood Plans may cover other topics and provide local detail in relation to other policy areas where appropriate.~~ Where policies are identified as not being strategic, as they relate solely to local or specific development management matters, Neighbourhood Plans which cover these topics will not need to demonstrate general conformity with these policies, however they must still have regard to any relevant parts of national policy. Appendix M of the Local Plan identifies whether policies are strategic or non-strategic.”

4. Proposed Appendix M is set out overleaf (modifications would also be required to the contents page in respect of the addition of Appendix M). The Council will include this revised wording in the schedule of modifications that is being collated as part of the Examination.

Appendix MSchedule of Strategic Policies

<u>SCLP2.1</u>	<u>Growth in the Ipswich Strategic Planning Area</u>
<u>SCLP2.2</u>	<u>Strategic Infrastructure Priorities</u>
<u>SCLP2.3</u>	<u>Cross-boundary mitigation of effects on Protected Habitats</u>
<u>SCLP3.1</u>	<u>Strategy for Growth in Suffolk Coastal District</u>
<u>SCLP3.2</u>	<u>Settlement Hierarchy</u>
<u>SCLP3.3</u>	<u>Settlement Boundaries</u>
<u>SCLP3.4</u>	<u>Proposals for Major Energy Infrastructure Projects</u>
<u>SCLP3.5</u>	<u>Infrastructure Provision</u>
<u>SCLP4.1</u>	<u>Existing Employment Areas</u>
<u>SCLP4.2</u>	<u>New Employment Development</u>
<u>SCLP4.3</u>	<u>Expansion and Intensification of Employment Sites</u>
<u>SCLP4.4</u>	<u>Protection of Employment Premises</u>
<u>SCLP4.5</u>	<u>Economic Development in Rural Areas</u>
<u>SCLP4.6</u>	<u>Conversion and Replacement of Rural Buildings for Employment Use</u>
<u>SCLP4.7</u>	<u>Farm Diversification</u>
<u>SCLP4.8</u>	<u>New Retail and Commercial Leisure Development</u>
<u>SCLP4.9</u>	<u>Development in Town Centres</u>
<u>SCLP4.11</u>	<u>Retail and Commercial Leisure in Martlesham</u>
<u>SCLP4.12</u>	<u>District and Local Centres and Local Shops</u>
<u>SCLP5.1</u>	<u>Housing Development in Large Villages</u>
<u>SCLP5.2</u>	<u>Housing Development in Small Villages</u>
<u>SCLP5.3</u>	<u>Housing Development in the Countryside</u>
<u>SCLP5.4</u>	<u>Housing in Clusters in the Countryside</u>
<u>SCLP5.7</u>	<u>Infill and Garden Development</u>
<u>SCLP5.8</u>	<u>Housing Mix</u>
<u>SCLP5.9</u>	<u>Self Build and Custom Build Housing</u>
<u>SCLP5.10</u>	<u>Affordable Housing on Residential Developments</u>
<u>SCLP5.11</u>	<u>Affordable Housing on Residential Developments</u>
<u>SCLP5.12</u>	<u>Houses in Multiple Occupation</u>

<u>SCLP5.15</u>	<u>Residential Moorings, Jetties and Slipways</u>
<u>SCLP5.16</u>	<u>Residential Caravans and Mobile Homes</u>
<u>SCLP5.17</u>	<u>Gypsies, Travellers and Travelling Showpeople</u>
<u>SCLP6.1</u>	<u>Tourism</u>
<u>SCLP6.2</u>	<u>Tourism destinations</u>
<u>SCLP6.3</u>	<u>Tourism Development within the AONB and Heritage Coast</u>
<u>SCLP6.4</u>	<u>Tourism Development outside of the AONB</u>
<u>SCLP7.1</u>	<u>Sustainable Transport</u>
<u>SCLP7.2</u>	<u>Parking Proposals and Standards</u>
<u>SCLP8.1</u>	<u>Community Facilities and Assets</u>
<u>SCLP8.2</u>	<u>Open Space</u>
<u>SCLP9.1</u>	<u>Low Carbon and Renewable Energy</u>
<u>SCLP9.2</u>	<u>Sustainable Construction</u>
<u>SCLP9.3</u>	<u>Coastal Change Management Area</u>
<u>SCLP9.4</u>	<u>Coastal Change Rollback or Relocation</u>
<u>SCLP9.5</u>	<u>Flood Risk</u>
<u>SCLP9.6</u>	<u>Sustainable Drainage Systems</u>
<u>SCLP9.7</u>	<u>Holistic Water Management</u>
<u>SCLP10.1</u>	<u>Biodiversity and Geodiversity</u>
<u>SCLP10.2</u>	<u>Visitor Management at European Sites</u>
<u>SCLP10.3</u>	<u>Environmental Quality</u>
<u>SCLP10.4</u>	<u>Landscape Character</u>
<u>SCLP10.5</u>	<u>Settlement Coalescence</u>
<u>SCLP11.1</u>	<u>Design Quality</u>
<u>SCLP11.3</u>	<u>Historic Environment</u>
<u>SCLP11.8</u>	<u>Parks and Gardens of Historic or Landscape Interest</u>
<u>SCLP12.1</u>	<u>Neighbourhood Plans</u>
<u>SCLP12.2</u>	<u>Strategy for Felixstowe</u>
<u>SCLP12.3</u>	<u>North Felixstowe Garden Neighbourhood</u>
<u>SCLP12.4</u>	<u>Land north of Conway Close and Swallow Close</u>
<u>SCLP12.5</u>	<u>Brackenbury Sports Centre</u>
<u>SCLP12.6</u>	<u>Land at Sea Road, Felixstowe</u>

<u>SCLP12.7</u>	<u>Port of Felixstowe</u>
<u>SCLP12.8</u>	<u>Land at Bridge Road</u>
<u>SCLP12.9</u>	<u>Land at Carr Rd / Langer Rd</u>
<u>SCLP12.10</u>	<u>Land at Haven Exchange</u>
<u>SCLP12.16</u>	<u>Felixstowe Leisure Centre</u>
<u>SCLP12.17</u>	<u>Tourism Accommodation in Felixstowe</u>
<u>SCLP12.18</u>	<u>Strategy for Communities Surrounding Ipswich</u>
<u>SCLP12.19</u>	<u>Brightwell Lakes</u>
<u>SCLP12.20</u>	<u>Land at Felixstowe Road</u>
<u>SCLP12.21</u>	<u>Ransomes</u>
<u>SCLP12.22</u>	<u>Recreation and Open Space in Rushmere</u>
<u>SCLP12.23</u>	<u>Ipswich Garden Suburb Country Park</u>
<u>SCLP12.24</u>	<u>Land at Humber Doucy Lane</u>
<u>SCLP12.25</u>	<u>Suffolk Police HQ, Portal Avenue, Martlesham</u>
<u>SCLP12.26</u>	<u>Strategy for Aldeburgh</u>
<u>SCLP12.27</u>	<u>Land rear of Rose Hill, Aldeburgh</u>
<u>SCLP12.28</u>	<u>Strategy for Saxmundham</u>
<u>SCLP12.29</u>	<u>South Saxmundham Garden Neighbourhood</u>
<u>SCLP12.30</u>	<u>Land north east of Street Farm, Saxmundham</u>
<u>SCLP12.31</u>	<u>Strategy for Woodbridge</u>
<u>SCLP12.32</u>	<u>Former Council Offices, Melton Hill</u>
<u>SCLP12.33</u>	<u>Land at Woodbridge Town Football Club</u>
<u>SCLP12.34</u>	<u>Strategy for Rural Areas</u>
<u>SCLP12.35</u>	<u>Innocence Farm</u>
<u>SCLP12.36</u>	<u>Former airfield Debach</u>
<u>SCLP12.37</u>	<u>Carlton Park, Main Road, Kelsale cum Carlton</u>
<u>SCLP12.38</u>	<u>Levington Park, Levington</u>
<u>SCLP12.39</u>	<u>Land at Silverlace Green (former airfield) Parham</u>
<u>SCLP12.40</u>	<u>Former airfield Parham</u>
<u>SCLP12.41</u>	<u>Bentwaters Park, Rendlesham</u>
<u>SCLP12.42</u>	<u>Riverside Industrial Estate, Border Cot Lane, Wickham Market</u>
<u>SCLP12.43</u>	<u>Land to the East of Aldeburgh Road, Aldringham</u>

<u>SCLP12.44</u>	<u>Land South of Forge Close between Main Road and Ayden, Benhall</u>
<u>SCLP12.45</u>	<u>Land to the South East of Levington Lane, Bucklesham</u>
<u>SCLP12.46</u>	<u>Land to the South of Station Road, Campsea Ashe</u>
<u>SCLP12.47</u>	<u>Land behind 15 St Peters Close, Charsfield</u>
<u>SCLP12.48</u>	<u>Land to the South of Darsham Station</u>
<u>SCLP12.49</u>	<u>Land North of The Street, Darsham</u>
<u>SCLP12.50</u>	<u>Land off Laxfield Road, Dennington</u>
<u>SCLP12.51</u>	<u>Land to the South of Eyke CoE Primary School and East of The Street, Eyke</u>
<u>SCLP12.52</u>	<u>Land to the West of Chapel Road, Grundisburgh</u>
<u>SCLP12.53</u>	<u>Land South of Ambleside, Main Road, Kelsale cum Carlton</u>
<u>SCLP12.54</u>	<u>Land North of the Street, Kettleburgh</u>
<u>SCLP12.55</u>	<u>Land to the rear of 31-37 Bucklesham Road, Kirton</u>
<u>SCLP12.56</u>	<u>Land at School Road, Knodishall</u>
<u>SCLP12.57</u>	<u>Land at Bridge Road, Levington</u>
<u>SCLP12.58</u>	<u>Land North of Mill Close, Orford</u>
<u>SCLP12.59</u>	<u>Land adjacent to Swiss Farm, Otley</u>
<u>SCLP12.60</u>	<u>Land adjacent to Farthings, Sibton Road, Peasenhall</u>
<u>SCLP12.61</u>	<u>Land between High Street and Chapel Lane, Pettistree (adjoining Wickham Market)</u>
<u>SCLP12.62</u>	<u>Land West of Garden Square Rendlesham</u>
<u>SCLP12.63</u>	<u>Land East of Redwald Road, Rendlesham</u>
<u>SCLP12.64</u>	<u>Land opposite The Sorrel Horse, The Street, Shottisham</u>
<u>SCLP12.65</u>	<u>Land off Howlett Way, Trimley St Martin</u>
<u>SCLP12.66</u>	<u>Land adjacent to Reeve Lodge, High Road, Trimley St Martin</u>
<u>SCLP12.67</u>	<u>Land off Keightley Way, Tuddenham</u>
<u>SCLP12.68</u>	<u>Land South of Lower Road, Westerfield</u>
<u>SCLP12.69</u>	<u>Land West of the B1125, Westleton</u>
<u>SCLP12.70</u>	<u>Land at Cherry Lee, Darsham Road, Westleton</u>
<u>SCLP12.71</u>	<u>Mow Hill, Witnesham</u>
<u>SCLP12.72</u>	<u>Land at Street Farm, Witnesham (Bridge)</u>

Schedule of Non-Strategic Policies

<u>SCLP4.10</u>	<u>Town Centre Environments</u>
<u>SCLP5.5</u>	<u>Conversion of buildings in the countryside for housing</u>
<u>SCLP5.6</u>	<u>Rural Workers Dwellings</u>
<u>SCLP5.13</u>	<u>Residential Annexes</u>
<u>SCLP5.14</u>	<u>Extensions to residential curtilages</u>
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<u>SCLP8.3</u>	<u>Allotments</u>
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<u>SCLP11.2</u>	<u>Residential Amenity</u>
<u>SCLP11.4</u>	<u>Listed Buildings</u>
<u>SCLP11.5</u>	<u>Conservation Areas</u>
<u>SCLP11.6</u>	<u>Non-Designated Heritage Assets</u>
<u>SCLP11.7</u>	<u>Archaeology</u>
<u>SCLP11.9</u>	<u>Areas to be Protected from Development</u>
<u>SCLP11.10</u>	<u>Newbourne – Former Land Settlement Association Holdings</u>
<u>SCLP12.11</u>	<u>Felixstowe Ferry and Golf Course</u>
<u>SCLP12.12</u>	<u>Felixstowe Ferry Golf Club to Cobbolds Point</u>
<u>SCLP12.13</u>	<u>Cobbolds Point to Spa Pavilion</u>
<u>SCLP12.14</u>	<u>Spa Pavilion to Manor End</u>
<u>SCLP12.15</u>	<u>Manor End to Landguard</u>

Appendix 6 Affordable Housing Provider Letter

Anthony Hardy
Capital Community Developments
30 Gardenia Close
Rendlesham
Suffolk IP12 2GX

30th September 2019

Dear Mr Hardy
Planning application DC/19/1499/FUL - Affordable Housing

I write following our recent discussions to confirm the agreement reached between Rex and Capital Community Developments. We have agreed Heads of Terms for the acquisition of 13 Discounted Market Sale Homes forming part of the affordable housing provision of the project, should you be successful in obtaining planning consent on the development.

The proposed homes are:


- 8 x Sudbury Ground Floor/First Floor two-bedroom apartments, 59 m2 each
- 5 x Sudbury Ground Second Floor two-bedroom apartments, 84 m2 each
- 13 DMS homes in total

We are delighted with the proposed mix and design of the 13 DMS homes, which we believe there will be significant demand for and will achieve good sales in the current market. In our experience DMS homes are affordable to many people otherwise priced out of the market and offer a far simpler and more affordable solution than Shared Ownership.

For reference Rex as a Registered Provider only operate within Suffolk and are based in East Suffolk where we have a growing portfolio of both rented and DMS homes.

We look forward hopefully to the delivery of these much-needed homes,

Yours Sincerely



A Oldman
Managing Director

Appendix 7 Saved Policy AP19 Compared to DM21 and DM22

Policy AP19 compared to DM21 and DM22

POLICY AP19 <u>Design</u>	Development Management Policy DM21 – Design: Aesthetics	Development Management Policy DM22 – Design: Function
Proposals which comprise poor design and layout or otherwise seriously detract from the character of their surroundings will not be permitted. In considering the design aspects of planning applications the District Council will have regard to Supplementary Planning Guidance which has been prepared and adopted and will generally resist proposals which do not conform to that Guidance.	Proposals that comprise poor visual design and layout, or otherwise seriously detract from the character of their surroundings will not be permitted. Development will be expected to establish a strong sense of place, using streetscenes and buildings to create attractive and comfortable places to live, work and visit. Accordingly, development will be permitted where the following criteria are met:	Proposals should make provision for their functional requirements. Planning permission will be granted for new development if the following criteria are met:
The following criteria will form the basis of Supplementary Planning Guidance, and will be used to assess design aspects of proposals: (i) proposals should normally relate to the scale and character of the surroundings;	(a) proposals should relate well to the scale and character of their surroundings particularly in terms of their siting, height, massing and form;	
(ii) new development generally should make adequate provision for public transport, cars, cycling, garages, parking areas, access ways, footways, etc, in a manner whereby such provision does not dominate or prejudice the overall quality of design and appearance;		(b) New development generally makes adequate provision for public transport, cars, cycling, garages, parking areas, access ways, footways, etc in a manner whereby such provision does not dominate or prejudice the overall quality of design and appearance;
(iii) in areas of little or varied townscape quality, the form, density and design of proposals should create a new composition and point of interest, which will provide a positive improvement in the standard of the built environment of the area generally;	(b) in areas of little or no varied townscape quality, the form, density and design of proposals should create a new composition and point of interest, which will provide a positive improvement in the standard of the built environment of the area generally;	
(iv) alterations and extensions to existing buildings should normally respect the plan form, period, style, architectural characteristics and, where appropriate, the type and standard of detailing and finishes of the original building;	(c) alterations and extensions to existing buildings should normally respect the plan form, period, style, architectural characteristics and, where appropriate, the type and standard of detailing and finishes of the original building;	
(v) in order for extensions to existing buildings to be acceptable, particularly on those which are considered to be architecturally and historically important, those located within a Conservation Area, or those that are 'Listed', the extension shall normally be visually 'recessive' and its size and design shall be such that the original building will remain the more dominant feature on the site;	(d) in order for extensions to existing buildings to be acceptable, particularly on those that are considered to be architecturally and historically important (including vernacular architecture) and those located in sensitive locations, the extension shall be visually 'recessive' and its size and design shall be such that the original building will remain the more dominant feature on the site;	
(vi) the use of materials and finishes, including colours, shall relate to, and respect, where appropriate, those of the immediate locality or the area generally;		

(vii) layouts should be related to, incorporate and protect any important natural landscape features on, or adjacent to, the site, including existing trees, shrubs and hedgerows. Where an existing hedgerow or group of trees are an important feature of the street scene and landscape, proposals should aim to retain all, or most, of them;	(e) layouts should incorporate and protect existing site features of landscape, ecological, heritage or amenity value as well as enhance such features e.g. habitat creation; and
(viii) adequate care and attention must be given to the form, scale, use, and landscape of the spaces between buildings and the boundary treatment of individual sites, particularly on the edge of settlements. Therefore, proposals for all new development should incorporate a hard and soft landscaping scheme, which forms an integral part of the overall design concept;	(f) attention must be given to the form, scale, use, and landscape of the spaces between buildings and the boundary treatment of individual sites, particularly on the edge of settlements.
(ix) the design of houses and other buildings should have regard to the requirements of people with disabilities;	(a) The design and layout of the development provides and maintains safe and convenient access for people with disabilities;
(x) proposals for development will be expected to take into account the need for crime prevention. Particular attention will be paid to such features as secure design, natural surveillance, adequate lighting and visibility. Proposals aimed at reducing crime within existing developed areas will be supported provided that they are not in conflict with the objectives of other Local Plan policies;	(d) Proposals for development take into account the need for crime prevention. Particular attention will be paid to such features as secure design, natural surveillance, adequate lighting and visibility. Proposals aimed at reducing crime within existing development areas will be supported provided that they are not in conflict with the objectives of other plan policies.
(xi) the District Council will support and strongly encourage the conservation of energy and the use of alternative and renewable sources of energy in the design and layout of development proposals for new buildings and conversions of existing buildings;	The District Council will support and strongly encourage the conservation of energy and the use of alternative and renewable sources of energy in the design and layout of proposals for new buildings and conversion of existing buildings, provided it would not seriously detract from the character of the area.
(xii) The District Council will also support and strongly encourage water conservation measures such as grey water systems, permeable soakaways, and water efficient devices.	The District Council will also support and strongly encourage water conservation measures such as grey water systems, permeable soakaways and water efficiency devices.
	In considering residential development, the District Council will have regard to Supplementary Planning Documents that have been adopted.
	(c) Provision is made to enable access, turning and manoeuvring for emergency vehicles and the collection of waste; and

Appendix 8 18/2374 Documentation

Planning Dept.

Suffolk Coastal District Council

East Suffolk House

Melton

Suffolk

IP12 1RT

E382.C1.Let02

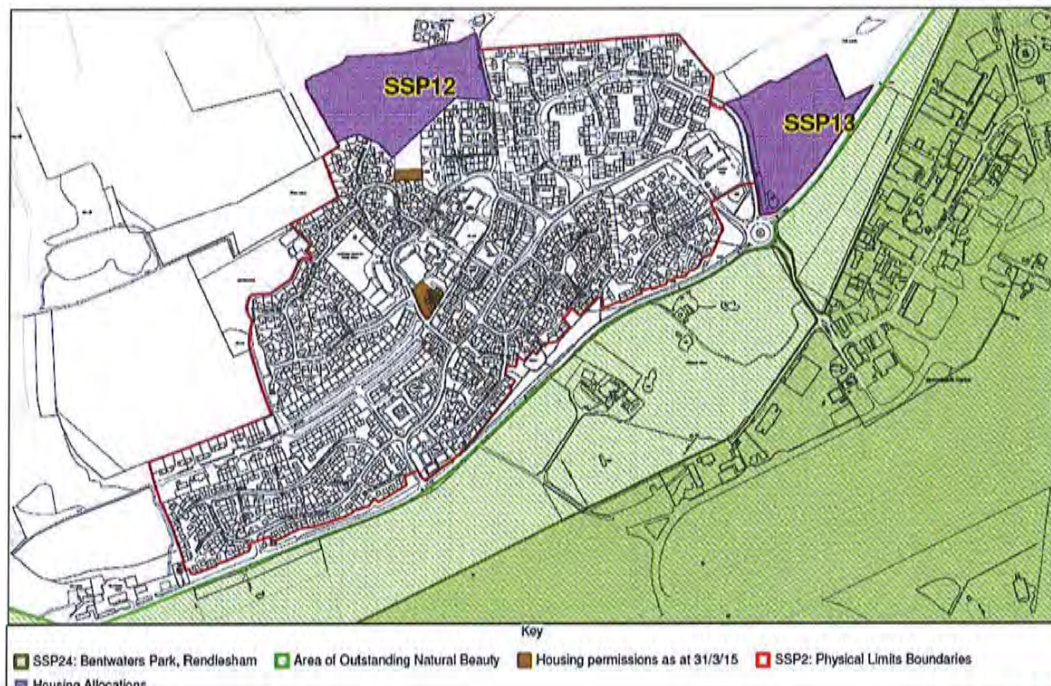
24 October 2017

Dear Sir / Madam,

REQUEST FOR PRE-APPLICATION ADVICE FOR A PLANNING APPLICATION FOR RESIDENTIAL DEVELOPMENT AT SITE SSP12 RENDLESHAM

We write on behalf of our client Capital Community Developments to request a pre-application meeting and follow up written response from the local planning authority.

Our clients are proposing to develop an allocated site in Rendlesham. The site is referred to in the Site Allocations DPD as SSP12 and is shown inset below:



57 - Rendlesham
Suffolk Coastal District Council

Site Allocations and Area Specific Policies Development Plan Document
Adopted - January 2017

Scale 1:7500
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193

Evolution Town Planning Limited

Registered Office:

Opus House Elm Farm Park
Thurston Bury St Edmunds
Suffolk IP31 3SH

Registered in England Number
10636748

Capital Community Developments is a special purpose vehicle for the development of Site SSP12. Members of the team have a successful track record of development in Rendlesham, having developed an earlier allocated housing site and built a residential education centre, the unique Peace Palace, just to the south of SSP12:



The housing development and peace palace are built according to the architectural principles of Maharishi Vastu and are described on the parish council's website: <http://rendlesham.onesuffolk.net/our-parish/maharishi-foundation/>

We understand the planning policy context to this application will be the development plan consisting of the core strategy and development Management Policies DPD, Site Allocations DPD and the Rendlesham Neighbourhood Plan. The principal material considerations being the National Planning Policy Framework and PPG and the emerging Local Plan Review.

We have read the Site Allocations DPD and the section relevant to Rendlesham and SSP12 in particular. We are also familiar with the aims and objectives of the neighbourhood plan.

Site SSP12 was allocated in the recently adopted Site Allocations DPD and as that document makes clear it followed an earlier local plan allocation for 75 dwellings. The current allocation is for approximately 50 dwellings. The policy preamble to SSP12 makes clear that the village as a whole has capacity to accommodate more than the 100 homes proposed but cites "highway factors" as the predominant limiting factor. Our involvement in significant planning matters in the Rendlesham area for many years (Bentwaters 'masterplan', AgriGen AD plants, Rendlesham neighbourhood plan and most recently Bentwaters Studios) has shown this not to be the case.

In fact the transport assessment for the recent film studios application (June 2017) has stated that:

*"Even using the maximum peak flows, these are significantly lower than the link flow capacity of these roads. The additional peak vehicle flows from the development will add only some (12/660) 2% on The Street, and some (10/391) 3% to Woodbridge Road, both of which are not anywhere near their link flow capacities (see below). Using TA 79/99 Determination of Urban Road Capacity, for **The Street**, this road is at less than 50% of its capacity, using the busiest direction of flow, as specified. **The maximum peak flow for Woodbridge Road is lower than The Street, and, whichever guidance one might use, this is clearly a maximum peak flow of a low order, with significant "spare capacity". For the vast majority of the day, these roads are lightly trafficked, including the hours when crew and cast members will travel to and from the site.**"*

It is unlikely that the situation described above has materially changed therefore we anticipate that the transport assessment that would accompany the planning application for up to 75 dwellings on SSP12 will confirm that the local highway network is not a limiting factor.

Evidently there is flexibility in the policy for more than the approximately 50 dwellings to be proposed on site SSP12 and evidently it is for the applicants and their consultants to provide sufficient justification for any proposal over the approximately 50 dwellings in the allocation.

Having review policy SSP12 we are clear that the forthcoming planning application will need to be supported by the following technical reports:

- Flood risk and foul drainage assessments
- Archaeology
- Air quality
- Land contamination
- Ecology
- Traffic and transport
- Planning statement
- Affordable housing statement
- Tree survey (boundary trees)

We are using specialist consultants with a proven track record in the local area (some specifically in Rendlesham/Bentwaters) and who are familiar with the requirements placed upon them. We are content that we know what is required of the various topics listed above however we would be grateful if the local planning authority could confirm the list of topics covered is complete.

Capital Community Developments design their buildings according to the principles of Maharishi Vastu Architecture which is characterised by specific orientation and appointment of

buildings and highly environmentally sensitive construction methods and materials. However the exteriors are in a Suffolk vernacular style.

The Maharishi Vastu properties meet a specific social demand and make a unique contribution to the mix and style of properties in Rendlesham which otherwise includes former USAF military personnel housing and volume housebuilder styles. As the Site Allocations DPD sets out, this is a defining characteristic of Rendlesham and a legacy of its former military origin. The Rendlesham neighbourhood plan recognises the Gardenia Close and Garden Square development as one of its housing character areas (RNP Appendix O).

Draft plans are enclosed with this pre-application request. Our clients are not seeking input on the designs themselves as they are very specific but they will be very happy to explain their particular architectural requirements. The LPA will know well that the NPPF states "Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness". As the previous developments at Gardenia Close, Garden Square and the Peace Palace (see photos above) demonstrate their designs are policy compliant.

Whilst acknowledging the requirements of SCDC policy DM2 in terms of affordable housing and the background given in the pre-ambles paragraphs 5.09 to 5.12 we are also conscious of NPPF policy which states that *"where they [Councils] have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. **Such policies should be sufficiently flexible to take account of changing market conditions over time**"*.

Our clients have commissioned a development viability report and are particularly keen to discuss this with the local planning authority. It is anticipated that this would form the mainstay of the pre-application discussions. A draft of the viability assessment is included with this pre-application advice request.

A payment of the pre-application fee of £4500 plus VAT will accompany this submission. We look forward to meeting with you at your earliest convenience.

Yours sincerely

Steven Bainbridge MRTPI

Associate

Encl.

Our Ref: DC/PREAPP/17/5049
Date: 9th January 2018
Case Officer: Jane Rodens
Dial Direct: (01394) 444505
E-mail: jane.rodens@eastsuffolk.gov.uk

Evolution Town Planning
Opus House
Elm Farm Park
Thurston
Bury St Edmunds
IP31 3SH

*Submitted to SCDC on
27th Nov 2017*

PRE-APPLICATION PLANNING ADVICE

APPLICATION REF: DC/PREAPP/17/5049

LOCATION:

Land North Of Gardenia Close
And
Garden Square
Rendlesham
Suffolk

PROPOSAL:

Mixed residential development and greenspace provision for up to 75 units.

Officer Advice

The proposal is for the development of 75 dwellings of mixed sizes and with a provision of green open space.

The proposal site is located to the north of Rendlesham, the site is identified under Policy SSP12 of the Site Allocations and Area Specific Policies. It is located within the Physical Limits Boundary of Rendlesham, to the north of the site is a sewerage works. To the east is the access road of Garden Square, the proposal is also accessed off of Tidy Road.

The north east corner of the site is proposed to be open space and a buffer for the sewerage works. On the plans that have been submitted it is shown that there are pipes through the site from the sewerage works, some of which need to be diverted.

No information has been submitted on the application in regards of the design of the properties and their internal layout, parking and a curtilage is demonstrated for each of the properties, however there is no indication on the amount of parking available, and the boundary treatments to be provided.

Planning and Coastal Management

Suffolk Coastal District Council, East Suffolk House, Station Road, Melton, Woodbridge, IP12 1RT
Telephone: (01394) 383789, E-mail: d.c.admin@eastsuffolk.gov.uk
DX: Woodbridge 41400
Website: www.eastsuffolk.gov.uk

Principle

The site is identified under Policy SSP12 of the Site Allocations and Area Specific Policies which states:

5.05ha of land west of Garden Square, Rendlesham, as shown on the Policies Map, is identified for a mixed residential development and greenspace provision for approximately 50 units.

Development will be expected to accord with the following criteria:

- o Meet the minimum distance from the Water Recycling Centre within which new residential development is considered acceptable as advised by Anglian Water;
- o Provision of a flood risk assessment;
- o Accommodate the sewers that cross the site;
- o The development will need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available;
- o The design, layout, mix and type of housing proposed is compatible with the housing and transport objectives set out in the 'made' Rendlesham Neighbourhood Plan;
- o Provision of affordable housing;
- o The remaining greenspace should be used for a mix of informal open space suitable for daily dog walking, allotments or orchards in accordance with Rendlesham Neighbourhood Plan policy RNPP3;
- o Provision of a substantial landscape buffer to the northern and western boundaries where it abuts open countryside;
- o An archaeological assessment will be required; and
- o A transport assessment.

In addition, the air quality impacts of traffic from cumulative development at Melton crossroads and the Air Quality Management Area declared in Woodbridge will need to be investigated in the form of an Air Quality Assessment, together with a mitigation appraisal.

It is considered that the principle of dwellings in this location is acceptable, in any future application further information would be required to demonstrate the impacts on the Air Quality Management Area as states above.

Within the Local Plan in table 3.6, it states the distribution of dwellings required within the District. I have applied this to the proposed development.

Bedrooms	1	2	3	4+			
Open Market Housing			4.5	24	29.5	17	75
Affordable Housing	32	23	12	8		75	
All Sectors	10	24	26	15	75		
Proposed	9	28	14	24	75		

As demonstrated above the proposed development is not far off the Districts requirements for 1 and 2 bedroom dwellings (as compared to all sectors), however there is less than expected 3 bedroom dwellings and more than expected 4 plus bedroom dwellings. It is recommended that the spread of dwellings more in line with the above table to meet the requirements of the district.

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It has been demonstrated that there is a requirement and affordable housing/socially rented dwellings can be achieved on the site. There is no detail on how many bedrooms that these properties would have and where they are to be located within the site. It is recommended that these are 1 or 2 bedroom dwellings, which is required through the table above. In a full application it would likely that it would be recommended that the amount of affordable housing is conditioned or achieved through a S106.

This proposal would also be CIL liable, due to the increase in the number of dwellings. Further details of which can be found on the councils website.

In regards of the design it is understood that this development is designed in a specific orientation and layout. However, it would be recommended that some changes are made to the development, which are the following.

There appears to be a boulevard from the south to the north of the site, this is from the proposed area of open space and into a central space. This path finishes at a 5 bedroom detached dwelling, which is not central with the path. This dwelling should be altered to make a statement at the end of the main path through the site to make a focal point.

It would also be recommended that there is a large path and leading to a focal point going from west to east, this would then lead to the rest of Rendlesham, this could be achieved by creating footpaths to Tidy Road.

Further detail would need to be provided on the amenity areas that are to be allocated to each of the dwellings. It would appear from the information provided that the dwellings are to be located in the centre of the plots with parking to the front. Some of the garden spaces do not appear to be large enough for the amount of bedrooms that are proposed within the dwellings. It is recommended that larger gardens are provided, this can be achieved by removing two of the access roads, rotating the dwellings, where the roads have been removed, to face in the opposite direction. This would create additional space and reduce the amount of access roads within the site, therefore less hardstanding. However this would depend on any comments from the Highways Officers.

In regards of the impact on the amenity on the current residents of the area and the future residents of the site, this cannot be fully considered as there is no information on the height and openings that are proposed on the properties. It is recommended that there is no direct overlooking between windows and onto any private rear amenity space. There should be no overshadowing between the properties to the habitable rooms and rear amenity spaces.

Each plot will need to ensure that it contains an appropriate amount of car parking for the amount of bedrooms that are located within the properties. It is recommended that an additional pre-application consultation is held with Suffolk County Council Highways Department, this is to overcome any issues that they may have on the proposal, this would need to be made separately.

It is also recommended that pre-application discussions take place with Anglian Water regarding the distance required from the Water Recycling facility and the location of the sewer diversions across the site.

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Subject to comments from statutory bodies and any other material planning considerations, it is recommended that the principle of the proposal is considered to be acceptable. However, there are more properties than are recommended in the policy that allocates this site for residential development, therefore it is recommended that the mix of dwellings are altered to closely relate to the mix required by the district in table 3.6 of the Local Plan. There are other recommendations made in the pre-application report that would need to be achieved prior to a full application being submitted to the Local Planning Authority.

SP1 Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP1A Presumption in Favour of Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP3 New Homes (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP14 Biodiversity and Geodiversity (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP15 Landscape and Townscape (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP16 Sport and Play (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP17 Green Space (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP18 Infrastructure (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP19 Settlement Policy (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP27 Key and Local Service Centres (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP29 The Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM1 Affordable Housing on Exception Sites (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM2 Affordable Housing on Residential Sites (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM7 Infilling and Backland Development within physical limits boundaries (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM19 Parking Standards (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM21 Design: Aesthetics (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM22 Design: Function (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM23 Residential Amenity (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM27 Biodiversity and Geodiversity (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

Planning and Coastal Management

DM28 Flood Risk (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

Related Applications:

Reference No	Proposal	Decision	Date
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CONSTRAINTS

Ancient Monument - Location: Bowl barrow in Cottage Wood, 800m north-east of Rendlesham Hall Farm

SCC Archaeological Sites - Name: Rendlesham Park

SCC Archaeological Sites - Name: Rendlesham Hall (site of)

Community Infrastructure Levy - Name: Community Infrastructure Levy Charging Zone Med

Suffolk Coastal Local Plan - Name: SSP3-19 And FPP3-8 HOUSING ALLOCATION

Suffolk Coastal Local Plan - Name: SSP2 Physical Limits Boundaries

CL Sites - CL Reference: 03/00002/CLHIS

CL Sites - CL Reference: 05/00009/CLHIS

DC Case Polygons - DC Reference: DC/14/3662/AME

DC Case Polygons - DC Reference: DC/17/4188/EIA

DC Case Polygons - DC Reference: C/07/0785

EA - Surface Water Flood Data - Area: 425

EA - Surface Water Flood Data - Area: 12475

EA - Surface Water Flood Data - Area: 400

EA - Surface Water Flood Data - Area: 425

EA - Surface Water Flood Data - Area: 1575

As with all pre-application advice, the Council is not bound with regard to its final decision on any future application. Please note – this pre-application advice is given on the basis of National and Local Planning Policies applicable on the date the advice is given.

Additional Planning and Building Control information can be found online at www.planningportal.gov.uk. If a planning application is needed online applications can be submitted at the same address.

Case Officer: Jane Rodens, Area Planning & Enforcement Officer (01394) 444505

Authorising Officer: Katherine Scott, Team Leader (Central Area), (01394) 444503

On behalf of Head of Planning and Coastal Management

Planning and Coastal Management

Suffolk Coastal District Council, East Suffolk House, Station Road, Melton, Woodbridge, IP12 1RT
Telephone: (01394) 383789, E-mail: d.c.admin@eastsuffolk.gov.uk
DX: Woodbridge 41400
Website: www.eastsuffolk.gov.uk

DC – PRPREZ - Issue April 2017

Planning Statement in Support of a Development of 75 New Homes in Rendlesham

May 2018



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Opus House
Elm Farm Park
Thurston
Bury St Edmunds
Suffolk
IP31 3SH

T 01359 233663
E enquiries@evolution-planning.co.uk
W evolution-planning.co.uk

Planning Statement in Support of a Development of 75 New Homes in Rendlesham

Reference: E382.C1.Rep01

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Section 1. Introduction

Section 2. Site Description

Section 3. Design and Access

Section 4. Planning Policy Analysis

Section 5. Conclusion

Appendix 1 Frequently Asked Questions

Appendix 2 Development Plan Policies

Appendix 3 Full Planning Policy Analysis

Appendix 4 Indicative CIL Calculation

1.0 Introduction

- 1.1 This planning application proposes the development of 75 new homes on a site in the northeast of Rendlesham that has been long-planned for housing.
- 1.2 The application has been submitted by Capital Community Developments. This is a new company but the directors and the members of the team were responsible for delivering the houses on Garden Square and Gardenia Close and the Peace Palace. The applicants are also residents of Rendlesham.
- 1.3 For decision makers, the starting point is to determine planning applications in the context of policies and objectives in the 'Development Plan'. The development plan is the statutory document which calculates the present and future housing need in Suffolk Coastal and identifies sites for new housing to meet that need. In this case, the development plan consists of the District Council's Local Plan and the Parish Council's Neighbourhood Plan. There is also national planning policy to consider.
- 1.4 The site of this proposed development is identified in the Local Plan and referred to as site SSP12 and is allocated for housing development. The Local Plan sets out the reports and surveys needed to support a planning application for housing on this site. This planning statement is one of the documents required to accompany a planning application of this nature. Other supporting documents include, amongst others, a highways statement, flood risk assessment and ecology survey. These documents are available on the District Council's website and should be read alongside this planning statement.
- 1.5 The Local Plan policy that governs development on this site states that the site has been identified by the District Council as appropriate for approximately 50 dwellings. The Local Plan allocates approximately 100 homes to Rendlesham as its contribution to the overall minimum housing requirements across the district in the current Local Plan – which is in the early stages of being reviewed and updated. The Local Plan also says that *"the village [of Rendlesham] has capacity to accommodate more than the 100 homes proposed"*. Therefore the 'approximately 50 homes' referred to in the policy should not be regarded as an upper limit but as a starting point; a minimum to be achieved and to be exceeded if it is acceptable in planning terms to do so.
- 1.6 The District Council accepts that the late commencement of the Local Plan review has resulted in the Local Plan being out of date. This means that the local planning authority's

principle planning policy on housing supply and distribution (Core Strategy policy SP2) is out of date and can be given less weight in planning decisions. Therefore Paragraph 14 of the National Planning Policy Framework (discussed further below) is applied to decision making – this is referred to as the ‘tilted balance’ in planning terminology and means that the Presumption in Favour of Sustainable Development (a principle running through both national and local planning policy) applies.

- 1.7 The nation-wide issues of housing supply and affordability are well documented. National planning policy encourages applications like this and states that proposals for new housing should “*boost significantly the supply of housing*”, use identified land efficiently and contribute to a greater supply of high quality housing.
- 1.8 As with the other housing that the applicants have developed in Rendlesham, this proposal is equally high quality in terms of the construction of the homes themselves, but also their surroundings; the way they connect to the rest of the village and the public open spaces they provide.
- 1.9 Infrastructure is a key concern in Rendlesham as set out in the Neighbourhood Plan. This development would contribute funds to be spent on necessary local infrastructure through the Community Infrastructure Levy (CIL) and further details of this are set out below.
- 1.10 Highways and access is another key matter and this is discussed in this document (in the design and access section) and the accompanying Highways Statement.
- 1.11 This planning statement sets out how applicants consider their proposed development complies with the development plan policies.
- 1.12 Local and national planning policies state that developments that, on balance, comply with the development plan are sustainable and should be granted.
- 1.13 Capital Community Developments Ltd have consulted with both the District Council, Parish Council, local organisations and others in the preparation of this planning application and are content that, on balance, the proposal is a sustainable development, the benefits of which include:
 - Making efficient use of land on an allocated housing site
 - Boosting the supply of housing and contributing to an out of date housing and distribution policy context
 - Providing high quality housing and contributing to the established mix of housing in Rendlesham

- The sustainable location of the site within the settlement boundary of a key service centre
- Contribution towards ongoing housing land supply and the minimum Core Strategy delivery figures
- Provision of affordable housing
- Very limited environmental or landscape impacts
- The contribution towards local infrastructure through the Community Infrastructure Levy (CIL)
- The provision of significant on-site pedestrian links to the wider village and village centre
- Efficient use of land and an appropriate development density which reflects local development density

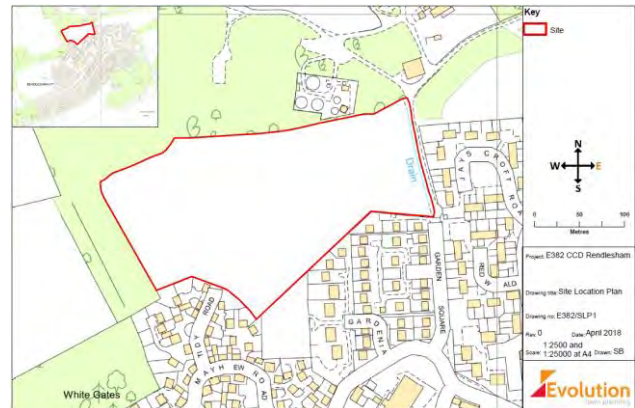
1.14 Capital Community Developments Ltd encourage members of the public and decision makers to read the whole of the planning application and to understand the planning context in which it has come forward. However a summary of information for neighbours and residents of Rendlesham is provided in Appendix 1 to answer frequently asked questions that have been raised so far through public consultation.

1.15 It is understood there will be a second public consultation event organised by the Parish Council after this planning application has been submitted and representatives of Capital Community Developments Ltd will attend in order to answer questions people may have about the proposals.

1.16 Capital Community Developments Ltd look forward to discussing their proposals and, beyond that, to receiving planning permission for this sustainable development.

2.0 Site Location and Description

2.1 The site for the planning application is shown on the submitted site plan. An inset image of that site plan is shown here for ease of reference alongside an inset of the site location plan. These plans show the shape and extent of the site, its location in Rendlesham and some basic details of the neighbouring land uses whether they are houses, woodland or agricultural land.



2.2 The site is located to the north of Rendlesham and is approximately 5 hectares in size. Road access to the site will be via Tidy Road and Garden Square.

2.3 The land is relatively flat and bounded by woodland on the north and west boundaries and residential development on the east and south boundaries. Further to the north, beyond the woodland, the predominant land use is agricultural. Just to the north of the site is a sewage treatment plant:



2.4 The photographs below show the site in its current state:



3.0 Design and Access Principles

- 3.1 National Planning Practice Guidance specifies the design and access information a planning application should include. It states:

“What should be included in a Design and Access Statement accompanying an application for planning permission? A Design and Access Statement must:

- (a) Explain the design principles and concepts that have been applied to the proposed development; and*
- (b) Demonstrate the steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account.*

A development’s context refers to the particular characteristics of the application site and its wider setting. These will be specific to the circumstances of an individual application and a Design and Access Statement should be tailored accordingly.

Design and Access Statements must also explain the applicant’s approach to access and how relevant local plan policies have been taken into account. They must detail any consultation undertaken in relation to access issues, and how the outcome of this consultation has informed the proposed development. Applicants must also explain how any specific issues which might affect access to the proposed development have been addressed.”

- 3.2 National Planning Practice Guidance also states that:

“A Design and Access Statement is a concise report accompanying certain applications for planning permission and applications for listed building consent. They provide a framework for applicants to explain how the proposed development is a suitable response to the site and its setting, and demonstrate that it can be adequately accessed by prospective users. Design and Access Statements can aid decision-making by enabling local planning authorities and third parties to better understand the analysis that has underpinned the design of a development proposal. The level of detail in a Design and Access Statement should be proportionate to the complexity of the application, but should not be long.”

- 3.3 Local architects Nicholas Jacob Architects¹ have provided the necessary information, which we have arranged in the following section and under the relevant sub-headings in line with the guidance above.

¹ <http://www.njarchitects.co.uk/>

The design principles and concepts that have been applied to the proposed development

- 3.4 The site layout is based on the principles established in the existing Garden Square development to the south and the grid layout used there with orientation relating to the east-west axis. Grid layouts are not unusual in Rendlesham with the former USAF housing conforming to its own characteristic form as can be seen in the foreground of this aerial photograph:



- 3.5 At the heart of the design is a formal grouping of 24 dwellings centred on a communal garden forming a square.
- 3.6 The design follows the principles of Maharishi Vastu® Architecture. In outline these relate to the orientation of buildings, the careful placement of rooms, creation of well-considered proportions and the use of natural and non-toxic materials. The aim is to create homes set within a landscape that actively promote the health and wellbeing of residents and visitors.
- 3.7 The design of the buildings takes as a model the house-types already built at Garden Square, developing these where required to give the mix of housing required, including new types. This helps create the sense that the new development is a continuation of the existing Garden Square development and not a stand-alone estate.

- 3.8 The principle of orientation relating to the passage of the sun naturally leads to a formal geometry for the planning of the site, as does the creation of shared garden spaces within the site plan at locations central to groupings of dwellings. The use of symmetry and formal planning helps in place making and creates a feeling of harmony. It also allows for an effective use of land resources whilst still keeping the open feel of a community in gardens through the creation of extended vistas. These also aid in individuals easily being able to locate themselves and navigate the site.
- 3.9 With these principles being at the heart of the planning and the desire to create an environment that actively promotes a sense of community, the planning of the site has worked with its features and constraints to organically extend the village.
- 3.10 The plans follow a careful system of placement of rooms and entrances that takes consideration of the orientation of the dwelling that promotes wellbeing. The quality of internal spaces is given diligent thought, with generous ceiling heights in many rooms, and the use of roof spaces as living accommodation gives a richness to the interiors as well as maximising the efficient use of space. The designs are considered in the round with all elevations being given equal consideration, ensuring they sit well within the garden landscaping of the residential areas of the site.
- 3.11 Symmetry is used to give harmony to the elevations, and that care and skill is applied to the proportions of all elevations. This also helps with creating a sense of place as this principle is constant throughout the development.
- 3.12 The language of the dwellings draws upon the Suffolk vernacular, rural Georgian and local traditions to create distinctive dwellings, each with their own identity. A common palette of materials, forms and details ties them together.
- 3.13 There is a good mix of housing: 9 one-bedroom units, 27 two-bedroom units, 17 three-bedroom units, 14 four-bedroom units and 8 five-bedroom units. The use of flats allows for the residential area of the site to reflect the density of building footprints that are found in the area of Garden Square and Tidy Road. In terms of a numerical density, it is about 23 dwellings per developable hectare (based on 3.2 developable hectares) or about 9 dwellings per acre.
- 3.14 The need for a landscape buffer to the perimeter of the site has been identified in Local Plan policy despite the dense mature woodland that bounds the north and west of the site already preventing development from having a significant impact on the wider countryside beyond. Nevertheless it creates the opportunity to provide a perimeter path that can serve

for recreation. The proposal is to use natural elements along this route to create a trim trail to further promote opportunities for fitness and wellbeing. Where the existing off-site tree line narrows to the south of the waste water treatment plant, the use of native tree planting will reinforce the existing tree lines.

- 3.15 Three feature communal garden areas are located in key locations to foster wellbeing and community interaction. These also relate to the flats where the residents, in particular, will gain from the open space. This is supported by extensive landscaping that includes ornamental garden and orchard areas.
- 3.16 Parking has been set out to create a street scene that is not dominated by the car and keeps the feel of the garden community setting.

The steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account

- 3.17 The site lies immediately to the north of the village of Rendlesham. The current core of Rendlesham itself has grown from the former facilities of the airbase at Bentwaters and its associated domestic sites. The A1152 forms a boundary between the growing employment uses on the former airfield and the residential areas that were the supporting residential and community areas. As such the village and former airfield are a unique opportunity for the continued development of a district centre as a sustainable location to live and work.
- 3.18 The village centre is well serviced and additional housing growth has been identified in the Local Plan as being able to be accommodated, supporting the existing services and facilities whilst bringing additional community areas.
- 3.19 The site is relatively level and used for the cultivation of crops. There are few significant topographic features, the most notable is the east boundary to the Redwald Road area where there is an overgrown track and ditch with mature and semi mature trees forming a buffer between the existing housing and the site.
- 3.20 There are potential access points on the boundary to the north and south. The northern boundary will be served by a new access drive. The existing roads of Garden Square and Tidy Road meet the southern boundary and give the opportunities for connecting to the existing road network.

- 3.21 To the north and west boundaries are mature dense areas of woodland that effectively screen the site from the wider open farmland beyond. This screening gives the opportunity for a well landscaped buffer zone to the perimeter of the development:



- 3.22 The north eastern section of the site has the cordon sanitaire relating to the waste water treatment plant and is therefore given over to public open space. This is expanded south to give a significant area for the benefit of both residents of the development and the village as a whole. The eastern end of the site has the most direct link to the village centre and is located so as to allow access without passing directly through the new development if desired and helping the wider community to feel free to use the spaces provided.
- 3.23 To the east, the Redwald Road estate is former USAF housing which benefits from a formality of layout combined with open feel of buildings being set within an area that is landscaped following a similar principle to Garden Square, including buildings being principally orientated orthographically in a similar way to Garden Square.
- 3.24 The south eastern boundary abuts the Garden Square development and the Maharishi Peace Palace®, a centre offering course and retreat for practitioners and parties learning about meditation and wellbeing and seeking rest and relaxation. As the Garden Square Development followed the principles of Maharishi Vastu® Architecture there is the opportunity to link these existing areas to the proposed scheme to create a unified feel to the area. To the south west the site is abutted by the edge of the Mayhew Road development and Tidy Road currently meets this boundary.

The applicant's approach to access and how specific issues which might affect access to the proposed development have been addressed

- 3.25 The site is located to the northern edge of the village of Rendlesham, which has grown to be a district centre alongside the Bentwaters employment area and as such is a sustainable location for new homes. It offers access to local services and employment within short distances - the site is within a 6 minute walk or 2 minute cycle from the village centre underpinning the opportunities for sustainable travel:

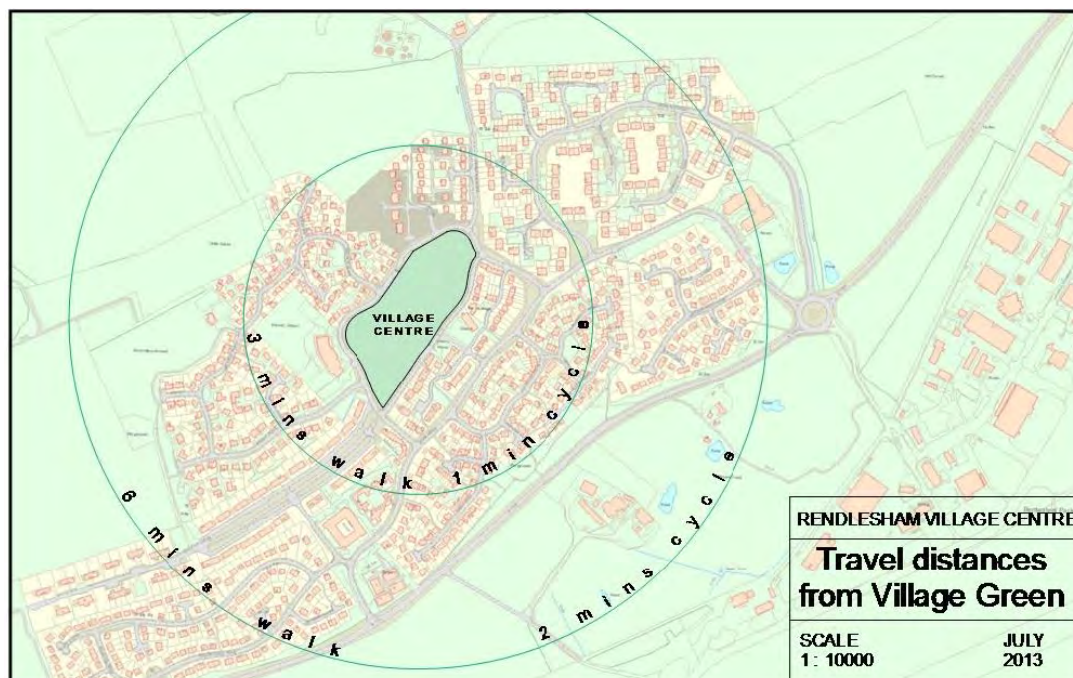


Figure 29 from the Rendlesham Neighbourhood Plan.

- 3.26 To the south and east of the site are existing residential developments with the opportunities to form new vehicular, cycle and pedestrian links to integrate the proposed development with the existing village.
- 3.27 There are potential access points on the boundary to the north and south. The existing roads of Garden Square and Tidy Road meet the southern boundary and give the opportunities for connecting to the existing road network via Sycamore Drive and Mayhew Road respectively. The northern boundary will be served by a new access drive serving the private road that is linked to this access.
- 3.28 The site is designed to give pedestrians and cyclists pleasant routes which are separated from the roads where possible, or through the use of shared surfaces. Of particular note is the east west central footpath which provides safe and pleasant circulation within the site.

3.29 The road network consists of a minor access road linking Garden Square and Tidy Road which would be adopted. A shared surface road set out to the standards of the Suffolk Design Guide for Residential Areas, but proposed to be un-adopted, runs around the perimeter of the central group of homes. Shared drives then serve all other dwellings with bin collection points and turning areas as required. Shared drives in the central area also serve as north south pedestrian links.

4.0 Planning Policy Analysis

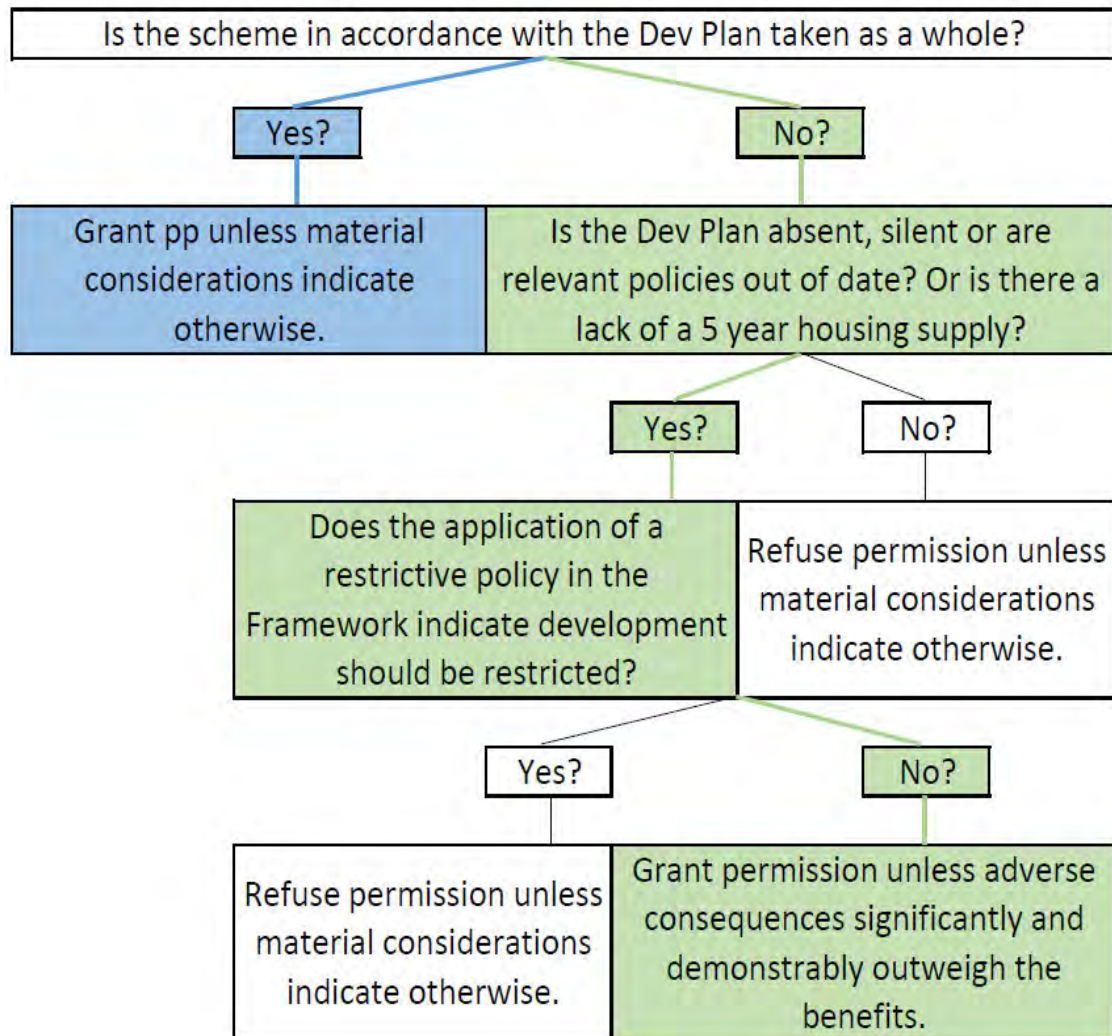
- 4.1 Planning law states that planning applications should be determined in the context of the Development Plan and its policies unless material considerations indicate otherwise.
- 4.2 This section of the planning statement sets out the current status of the Development Plan, the planning policies relevant to the planning application (against which the local planning authority need to decide the planning application), and our opinion on why the proposed development complies with the Development Plan and, as such, should be granted planning permission.
- 4.3 The starting point is to list the documents that constitute the Development Plan and then to list out the planning policies relevant to the proposed development.
- 4.4 In this planning statement we set out the general planning policy context in which the planning application needs to be decided and the planning policies and other matters relevant to that.

Status of the Development Plan

- 4.5 At the time of writing this planning statement the local planning authority accepts that the late commencement of the Local Plan review has resulted in the Core Strategy being out of date. This means that the local planning authority's principle planning policy on housing supply and distribution (Core Strategy policy SP2) is out of date and can be given less weight in planning decisions. This situation also means that Paragraph 14 of the National Planning Policy Framework (discussed further below) is applied to decision making. This is referred to as the 'tilted balance' in planning terminology and means that the Presumption in Favour of Sustainable Development (a principle running through both national and local planning policy) applies.
- 4.6 We consider that decision making on planning applications such as this can be simply represented according to the flow diagram below. This methodology follows principles established from a recent legal decision² in which Suffolk Coastal District Council were a main party. It is also our opinion that decision making in this case follows one of two routes as highlighted below; that the proposal complies with the development when read as a whole (highlighted blue) or that the triggering of the tilted balance takes the proposal through the route highlighted green.

² <http://www.bailii.org/uk/cases/UKSC/2017/37.html>

Decision making process after SDC vs. Hopkins Homes



- 4.7 As a Core Planning Principle, the NPPF requires local planning authorities to keep their local plans up to date.
- 4.8 Paragraph 47 of the NPPF sets out in clear terms the role of the planning system to “*boost significantly the supply of housing*”. This imperative is emphasised when key housing policies are out of date.
- 4.9 In this circumstance the Presumption in Favour of Sustainable Development in paragraph 14 of the NPPF applies and planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

4.10 In this case the Development Plan currently consists of the following planning documents:

- Core Strategy and Development Management Policies adopted in 2013
- Site Allocations and Area Specific Policies adopted in 2017
- Rendlesham Neighbourhood Plan made in 2015
- Saved Policies of the 2001 Local Plan



4.11 Material planning considerations include:

- The National Planning Policy Framework 2012 which post-dates the Council's 2008 Core Strategy. Relevant supporting paragraphs include:
 - Paragraph 7 and the three dimensions of sustainable development
 - Paragraph 14 and the Presumption in Favour of Sustainable Development
 - Paragraph 47 and the imperative to '*boost significantly the supply of housing*'

4.12 The local planning authority acknowledge that the Paragraph 14 'tilted balance' is engaged because their housing supply and distribution policy is out of date; namely that:

"Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

— any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

— specific policies in this Framework indicate development should be restricted."

4.13 This planning policy analysis section is structured to follow the decision making process in the 'tilted balance' exercise:

- I. Development Plan policy compliance
- II. Paragraph 14 consideration of any adverse impacts or policy conflicts
- III. Footnote 9 considerations
- IV. Balance of policy conflicts versus development benefits
- V. The effect of any other material considerations

I. Development Plan Policy Compliance

- 4.14 The planning policies from the planning documents that are relevant to this planning application are listed below and copies of the policies and their accompanying justifying text are included in Appendix 2 for ease of reference.

Policy no.	Name/Description
SP1	Presumption in Favour of Sustainable Development
SP1a	Sustainable Development
SP2	<i>Housing Numbers and Distribution</i>
SP3	New Homes
SP11	Accessibility
SP12	Climate Change
SP14	Biodiversity
SP15	Landscape and Townscape
SP16	Sport and Play
SP17	Green Space
SP18	Infrastructure
SP19	Settlement Policy
SP27	Key Service Centres
DM2	Affordable Housing on Residential Sites
DM19	Parking Standards
DM20	Travel Plans
DM21	Design Aesthetics
DM22	Design Function
DM23	Residential Amenity
DM24	Sustainable Construction
DM26	Lighting
DM27	Biodiversity
DM28	Flood Risk
DM32	Sport and Play
DM33	Allotments
SSP1	New Housing Delivery

SSP2	Physical Limits Boundaries
SSP12	Land West of Garden Square, Rendlesham
RNPP3	Allotment, Orchard and Growing Space Provision

- 4.15 The next stage of assessment is to consider the Development Plan policies in order to assess the degree to which the proposal conforms or conflicts with policy requirements and this is set out in full in Appendix 3 and summarised below.

Summary of Development Plan Compliance

- 4.16 The proposal has a minor conflict with Development Plan policy DM2. This is because the affordable housing provision is lower than the target 33%. The 24% affordable housing proposed is the same as the affordable housing need set out in supporting text to policy DM2. Nevertheless policy DM2 provides for exceptions to the target where “economics of provision” provide justification. The submitted viability report provides such a justification and so the conflict with policy DM2 is a permissible one.
- 4.17 There is a potential technical conflict with policy SSP12 because the number of proposed dwellings may not be described as “approximately 50”. However the pre-amble and other contributing policies make clear that the Local Plan’s housing figures are minimum figures. In any case the housing figures on which SSP12 is predicted are out of date and the NPPF requires local planning authorities to boost housing numbers significantly. Therefore, if there is a conflict with this policy, it is only numeric and the ‘conflict’ is supported by other policy imperative; it is therefore considered to be a positive conflict.
- 4.18 No other Development Plan policy conflicts have been identified and the proposed development is in general conformity with the Development Plan.

II. Adverse Impacts and Benefits

- 4.19 The only adverse policy impacts of approving this planning application relate to compliance with Development Management Policies DM2 (minor negative) and SSP12 (minor positive).
- 4.20 There are no other materially adverse impacts arising from this planning application including matters of residential amenity, landscape, flooding and drainage, ecology, trees, highways, design, density and mix.

- 4.21 The benefits that would arise from approving this planning application are significant and include:
- Making efficient use of land on an allocated housing site
 - Boosting the supply of housing and contributing to an out of date housing and distribution policy context
 - Providing high quality housing and contributing to the established mix of housing in Rendlesham
 - The sustainable location of the site within the settlement boundary of a key service centre
 - Contribution towards ongoing housing land supply and the minimum Core Strategy delivery figures
 - Provision of affordable housing
 - Very limited environment or landscape impacts
 - The contribution towards local infrastructure through the Community Infrastructure Levy (CIL)
 - The provision of significant on-site pedestrian links to the wider village and village centre
 - Efficient use of land and an appropriate development density reflecting local development density
- 4.22 Having considered carefully the limited policy impacts of permitting this planning application versus the clear benefits, and in the absence of any NPPF policies specifically restricting development, we are of the opinion that the impacts would not significantly and demonstrably outweigh the benefits, and therefore the balance falls in favour of granting planning permission.

III. Footnote 9 Considerations

- 4.23 Footnote 9 on page 4 of the NPPF lists policies which may restrict development related to *“Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion”*.
- 4.24 The Housing White Paper 2017 proposes to make the Footnote 9 examples a “clear list” and to include *“Ancient Woodland and aged or veteran trees”*.

- 4.25 The NPPF Review proposes to include *“irreplaceable habitats including ancient woodland; aged or veteran trees; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 55 [Non-designated heritage assets of archaeological interest, that are demonstrably of equivalent significance to scheduled monuments]); and areas at risk of flooding or coastal change. It does not refer to policies in development plans”*.
- 4.26 None of these policies or designations affect the application site.

IV. Planning Balance

- 4.27 The consideration of the Paragraph 14 balance above shows that the benefits of approving the development significantly and demonstrably outweigh the impacts.
- 4.28 Weighing this against the minor conflicts with policies DM2 (affordable housing provision) and SSP12 (proposing a higher number of dwellings than in the policy) indicates that the benefits continue to significantly and demonstrably outweigh the impacts.

V. Other Material Considerations to Weigh in the Balance?

- 4.29 The Rendlesham Neighbourhood Plan (RNP) includes a section on housing with a number of objectives which, because they are not strictly development plan policies, are responded to here as they are material considerations.
- 4.30 RNP Objective 3 is *“to ensure that adequate land for housing is provided for sustainable growth to meet the needs of future generations and enable the provision of affordable housing. The RNP would look for the principles contained within it to be included as part of any development brief for the outstanding allocation and any sites that are taken forward”*. Policy SSP12 of the Local Plan has not required a development brief to be agreed ahead of the submission of a planning application. However, as local residents, the applicants of this planning application have been fully aware of the principles of the RNP and have engaged the Parish Council ahead of the preparation of this planning application to seek input to the design and layout and requirements of the Neighbourhood Plan.
- 4.31 The supporting text to Objective 3 makes it clear that the expectation of the RNP was that *“the key tool for taking forward sites for development will be the Local Plan. The objectives and information within the RNP will guide SCDC, SCC and developers on housing density, land use, design and the infrastructure required to support the increase in population by reflecting the aspirations of Rendlesham”*. Policy SSP12, having been written after the RNP, undoubtedly takes it on board; making numerous references to it in the supporting text to SSP12.

- 4.32 Furthermore in the supporting text to Objective 3, the RNP acknowledges that *‘CIL contributions will be the means by which provision of land in the District Centre to provide for the community’s needs’* rather than any specific contribution via planning applications.
- 4.33 The supporting text to Objective 3 concludes by stating that *“the potential for Rendlesham to encompass housing growth exists”*.
- 4.34 RNP Objective 3a states *“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. Whilst new housing has introduced larger properties into the village, new housing should have regard to the sustainable mix of housing as identified in Appendix N”*.
- 4.35 It is assumed that reference to Appendix N (a summary of lost facilities in Rendlesham) above should have been a reference to Appendix O of the RNP which cites 9 housing areas with distinct characters that contribute to the ‘sustainable mix’ described in Objective 3a. Amongst the character areas is *“Area E – This development within Rendlesham is constructed in accord with the principles of Maharishi Sthapatya Veda and provides a mix of low density detached, semi-detached, maisonettes and flats. Sufficient off-road parking to avoid congestion or obstruction of footways”*. This Area E is the development previously built by the directors and the members of the team of the applicant company and, as the same design principles are guiding this scheme, it is felt that this proposed housing scheme complies with the requirements of Objective 3a.
- 4.36 RNP Objective 3b states *“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”*. The supporting text to Objective 3b includes *‘best practice design principles’*; the majority of which this design achieves; sufficient off road parking to Suffolk County standards, open green spaces and landscaping to be incorporated to avoid an urban appearance. This scheme meets the principles of Objective 3b.
- 4.37 RNP Objective 3c states that *“the street scene is an important part of the aesthetics of any housing development and development should be guided by the design principles in this NP. Inadequate parking can lead to overcrowded street scenes and inconsiderate parking on pavements, causing obstruction to pedestrians and cyclists. The guidance provided in this NP should be used to ensure provision of on-street landscaped parking bays as well as off-road parking for residents”*. The supporting text to Objective 3c clarifies its requirements by setting out a summary of the ‘ideal street scene’ consisting of:

- Sufficient off-road parking
- On-road landscaped parking bays
- Landscaping
- Open green spaces
- Grass strips between road and footway
- Low hedges
- Brick wall or panel fencing where gardens front roads
- Open front gardens and
- Natural fencing or timber post and rail

- 4.38 With the exception of landscaped on-road parking bays, the proposed scheme meets all of the requirements of an ideal street scene. On-road landscaped bays, in this case, are better provided for with off-road parking. It must also be remembered that the proposed scheme is derived from the scheme for Gardenia Close and Garden Square which the RNP described in Appendix O as having *“Sufficient off-road parking to avoid congestion or obstruction of footways”*.
- 4.39 RNP Objective 3d states that *“Sustainable transport is an important aim and off-road provision should be made on artery roads in developments to promote the use of cycling and shared space schemes within the village. Good examples of this can be found in Rendlesham and these principles should be followed when designing new housing schemes”*. This proposed scheme includes significant provision of cycleways and footways in compliance with this Objective.
- 4.40 RNP Objective 3e is *“To ensure less tangible infrastructure is provided for. This list is not exclusive: telephony, sewage, and services such as doctors, dentist and family services”*. The supporting text makes clear that it is *“service providers [and not developers who] need to ensure provision is commensurate with the growing population”*.
- 4.41 RNP Objective 3f states *“to ensure that local homes are built for local people so that people who live and work in Rendlesham can afford to stay in the village when personal circumstances change e.g. the sale of a rented property, leaving home, downsizing for older people or finding more suitable accommodation because of disability”*. The supporting text acknowledges that for Rendlesham, affordable housing *“is expected to be provided through SCDC’s policy DM2”*. Our response to policy DM2 is provided earlier in this statement alongside the policy expectation that levels of affordable housing lower than the target of 1 in 3 can be justified where economic evidence is provided.
- 4.42 As can be seen, this planning application is in general conformity with the housing objectives of the Rendlesham Neighbourhood Plan and the applicant’s previous development at Gardenia Close and

Garden Square is included in the Neighbourhood Plan as an example of a residential development that provided “*Sufficient off-road parking to avoid congestion or obstruction of footways*” – a key issue in the Neighbourhood Plan.

- 4.43 There are no other material considerations which would counteract the clear balance in favour of approving this planning application.
- 4.44 The NPPF Review places an increased emphasis on delivery of housing. In this case the applicants have a proven local track record of delivering housing in Rendlesham. Granting planning permission for this proposal would, as far as is possible to do so, ensure delivery of a significant proportion of the Local Plan’s housing allocations to Rendlesham as part of a very high quality scheme – again, the evidence for which can be seen in Garden Square and Gardenia Close.

Planning Policy Conclusion

- 4.45 The local planning authority acknowledge that the Paragraph 14 tilted balance is engaged because their housing supply and distribution policy is out of date.
- 4.46 We have weighed up the Development Plan policy compliance and consider that the only impacts which arise are to policies DM2 (affordable housing provision) and SSP12 (proposing a higher number of dwellings than in the policy).
- 4.47 The impact with DM2 is a minor negative impact in that the proposal does not achieve the targeted affordable housing provision of 33% but instead meets the 24% target in the policy pre-amble; an exception which DM2 allows where ‘economics of provision’ is fully justified.
- 4.48 The impact with SSP12 is a positive one because more housing than the provision sought by the policy has been achieved which will help the local planning authority ‘boost housing supply’ beyond the Core Strategy minimum figures on a sustainable site.
- 4.49 The proposed development would be in conformity with all other relevant Local Plan policies.
- 4.50 The proposed development will contribute to the three dimensions of sustainable development by performing the following roles:

Economic

- Employment in the construction phase
- Support by way of patronage to local facilities and services
- An influx of new residents some of whom may set up new local businesses

- Contributions to local infrastructure by way of the Community Infrastructure Levy (CIL) to the order of approximately £700,000 of which £175,000 will be directed locally.

Social

- Provision of affordable housing and contribution to the mix and tenure of housing in a sustainable settlement
- Support by way of patronage to local facilities and services
- An influx of new residents some of whom may join local clubs and societies
- Maintaining and enhancing settlement character and residential amenity

Environmental

- Efficient use of allocated land of low environmental value
- Minimal environmental impacts arising from development

4.51 Based on the lessened weight to be given to the local planning authority's housing supply and distribution policy and the opportunity to contribute to ongoing housing supply in a sustainable location with minimal impacts in a location that is sustainable, we consider this proposal represents sustainable development in its simplest and clearest form and should be approved without delay.

5.0 Overall Conclusion

- 5.1 This planning application is for 75 new homes on land allocated for residential use within a key service centre where the previous Local Plan allocated this site for 75 new homes.
- 5.2 The reason for the reduction in dwellings in the present allocation is explained in the Local Plan as 'highway factors' and the cordon sanitaire of the water treatment plant. The highways statement confirms highways factors are not a constraint to 75 new homes being delivered and the designs show how 75 new homes can be accommodated on site in compliance with planning design policies, whilst observing the cordon sanitaire.
- 5.3 The local planning authority acknowledge that the late commencement of the Local Plan Review has resulted in the Core Strategy being out of date and that the 'tilted balance' applies and decision making should follow the Presumption in Favour of Sustainable Development.
- 5.4 This planning application proposes to deliver housing efficiently whilst meeting the tests of development policies and 'boosting housing supply' in line with national planning policy.
- 5.5 This is a very high quality scheme with significant provision of open space from a proven deliverer of housing in Rendlesham.
- 5.6 We have considered the requirements of the Development Plan and material considerations and consider that the tilted balance falls in favour of granting planning permission to this sustainable development because the benefits far outweigh the impacts.

Information for Neighbours of the Site and Residents of Rendlesham

This section contains a number of frequently asked questions that have been raised during public consultation to the planning application before it was submitted and is presented here for ease of reference for local people new to this proposal and asking the same questions.

We understand another public consultation event will be arranged by the Parish Council after the planning application has been submitted. If you have any questions about the planning application that we have not covered here please feel free to ask a representative of Capital Community Developments Ltd at the next consultation event. Alternatively you can contact the local planning authority directly when the planning application is out on public consultation.

Q. What is this planning application for?

The planning application is for 75 homes on the empty field site at the end of Garden Square and Tidy Road. It is an extension of the existing Maharishi Garden Village. The boundary of the application site is shown on a plan called the Site Plan and the details of the development are shown on a plan called the Block or Layout Plan. These documents will be available at the consultation event and on the District Council's website.

Q. Who has put this planning application in?

The planning application has been prepared by and on behalf of Capital Community Developments Ltd. The applicants are residents of Rendlesham and live in the Garden Square and Gardenia Close development.

The various supporting surveys and reports have been written by consultants working for the applicants. However these consultants are members of respective professional institutes (which oversee the quality of their work) and the planning application documents will be reviewed by relevant 'statutory consultees' e.g. the Suffolk County Council Highways Department will review the submitted highways report.

Q. Who will live in these houses?

The houses will be available on the open market for anyone wishing to buy homes of their particular specification, for which a waiting list already exists.

The district council requires a proportion of the new housing to be ‘affordable housing’ which the Government defines as *“Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision”*.

This planning application is proposing 24% affordable housing which will consist of shared equity housing that will be sold at 75% of market value with a registered affordable housing provider holding a second charge. Suffolk Coastal District Council will judge the acceptability of this proposal.

Q. How will the site be accessed to and from the village by vehicles and on foot?

The site will have two vehicular accesses; via Garden Close and Tidy Road. Roadways, cycle ways and footways are shown on the site masterplan.

Q. What will the new houses look like?

The new houses will be very similar in design to the existing homes on Garden Square and Gardenia Close:





Q. How will the site preparation and construction be managed?

The applicants expect to provide a construction management plan in the future if this planning application is approved. In that circumstances it is expected that construction traffic would access the site via the eastern roadway off Garden Square and that the works and storage compound would be in the north-eastern corner of the site to reduce impact to residents of Rendlesham as far as is practicable.

Q. How do I make comments on the planning application?

The planning application will be available on the District Council's website for comment or alternatively residents of Rendlesham could provide comments to the Parish Council at an early point in the 21day public consultation period.

Development Plan Policies and Objectives



Suffolk Coastal...
...where quality of life counts

Suffolk Coastal District Local Plan

Core Strategy & Development Management Policies

Development Plan Document

July 2013

sectors of the economy develop and expand, the local workforce will have been bolstered by skilled workers from outside of the district.

- 3.12 A range of new homes will be provided, including those for sale, for private rent or more affordable housing, such as affordable and social rent. Land for new homes will be provided by means of specific housing allocations through the LP and by way of rural exception sites, including those provided via the Community Right to Build. This will enable the workforce to live and work locally and to enhance existing communities.
- 3.13 To support the delivery of new homes and the strengthening of our economy, the transport infrastructure will be improved. This will include improvements to the bus and rail network as well as introducing traffic management measures to the A14 and A12, and other routes as required.

Community Well-being

- 3.14 All the people who live in Suffolk Coastal will have equal access to basic services, supported in part by new, high speed broadband connections as promised by national government. The district will be an area of excellence for rural accessibility. Closer partnership working will be achieving an increase in the use of public and community transport and a reduced need for personal transport, having the additional benefit of contributing towards CO2 reduction. Better access to leisure facilities and the countryside will have the benefit of encouraging a healthier lifestyle, both mental and physical.
- 3.15 The build up of community partnerships and enterprise, through community led planning in response to the drive towards localism, will be an important part of all peoples' lives. It will offer local solutions to local issues and priorities within the skeleton of the LP. One of the roles of the LP will have been to ensure that the necessary infrastructure, services and facilities required to support the new development it promotes has been provided in a timely manner. Communities will be cohesive and inclusive. The incidences of poverty will have reduced through improved opportunities in education, jobs, healthcare, and access to decent homes.

THE OBJECTIVES AND STRATEGIC POLICIES

SUSTAINABLE DEVELOPMENT

Objective 1 – Sustainability

To deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development.

3.16 *Summary Outcome: A more sustainable environment.*

- 3.17 In a world that is increasingly conscious of the need to manage its resources very carefully and to address the issue of climate change, spatial planning has a responsibility to ensure that development takes place within a sustainable framework addressing both the threats and opportunities that this brings. Ensuring that future development contributes to sustainable development remains a key Government priority as set out in the National Planning Policy Framework (NPPF). This means making the most of opportunities as they arise to ensure that not only is new development sustainable, but that where appropriate it contributes to making existing developments and communities more sustainable, for example through opportunities to live and work within a short distance but also in an attractive environment. It is for this reason that sustainable development is the first and overarching policy that this Core Strategy addresses. This Policy (SP1), together with those relating to Climate Change (Policy SP12) and Settlement Hierarchy (Policy SP19), comprise the foundations around which the Core Strategy framework is built.



MIKE PAGE

Strategic Policy SP1 – Sustainable Development

Central to the Core Strategy for the future of the Suffolk Coastal district is the achievement of sustainable development. The Strategy in this respect will be to:

- (a) mitigate against and adapt to the effects of climate change;
- (b) relate new housing development to employment services, transport and infrastructure. To achieve this a defined Settlement Hierarchy, itself based on sustainability principles, has been created and applied;
- (c) achieve a local balance between employment opportunities, housing growth and environmental capacity;
- (d) ensure the provision of the appropriate infrastructure in order to support existing and proposed communities;
- (e) give priority to re-using previously developed land and buildings in and around built-up areas, where possible ahead of greenfield sites;
- (f) promote the use of sustainable methods of construction, including materials, energy efficiency, water recycling, aspect etc;
- (g) reduce the overall need to travel but where travel is necessary, to better manage the transport network to enable it to function efficiently;
- (h) enable a healthy economy, notably in the town centres and rural areas, taking advantage of regeneration opportunities where appropriate;
- (i) enhance accessibility to services;
- (j) conserve and enhance the areas natural historic and built environment;
- (k) maintain and enhance a sense of place; and
- (l) create and promote inclusive and sustainable communities in both urban and rural locations.

Footnote: 'Built-up areas' in this context means settlements with physical limits boundaries.

3.18 Policy SP1 sets the framework which has guided the development strategy for the district to 2027. The following policy sets out the Council's approach to the consideration of individual development proposals which accord with that strategy and NPPF.

Policy SP1A – Presumption in Favour of Sustainable Development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted*.

*Footnote: *For example those policies relating to sites protected under the Birds and Habitats Directives (NPPF paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Local Green Space; and Area of Outstanding Natural Beauty; Heritage Coast; designated heritage assets and locations at risk of flooding or coastal erosion.*

HOUSING

Objective 2 – Housing Growth

To meet the minimum locally identified housing needs of the district for the period 2010 to 2027, taking into account existing and future economic, environmental and social opportunities and constraints.

3.19 **Summary Outcomes:** *Provision of at least 7,900 new homes across the District over the period 2010 to 2027. Provision in the form of allocations will be made sustainably and in accordance with the Settlement Hierarchy (Policy SP19 and accompanying Tables 4.1 and 4.2 and Policies SP20 – SP29). Specific sites will be identified in the Site Specific Allocations Development Plan Documents which will follow the Core Strategy, including those in the form of Area Action Plans or Neighbourhood Plans. These will be supplemented by other small scale provision for example in the form of infill development, or in the form of rural exceptions in accordance with Policy DM1 which can occur at any time. Overall, the provision of new homes will be related to employment, new and improved services, facilities, transport and other infrastructure or in support of an otherwise identified local housing need. An early review of the Core Strategy will be undertaken commencing by 2015 with the publication of an Issues and Options Report. This will identify an updated, evidenced, scale and distribution of housing and employment land to meet the needs of the district to 2031, taking advantage of the full 2011 Census information.*

3.20 The focus for growth will be the major centres – notably the more urbanised area east of Ipswich and to a lesser extent the Felixstowe peninsula, both of which contain strategic employment sites of regional and national significance. Elsewhere new homes will be dispersed across the other market towns and smaller sustainable communities. New growth will be at levels appropriate to the size of the town or village, taking account of its function, character and environmental capacity.

3.21 In addition, across the rural areas, the introduction of the rural cluster Policy DM4, the introduction of one in three market housing in Policy DM1, and the acceptance of the subdivision of larger dwellings where this would meet a local need in Policy DM3, will provide some further small scale opportunities for new housing provision.

Housing Numbers – Assessing Need and Supply

3.22 The number of new homes to be provided over the period to 2027 has been determined at the local level. It is in essence a two stage process, which involves:-

- 1) An objective assessment of future housing needs based on modelled projections of demographic and socio-economic data: and
- 2) Secondly policy judgements are applied to identify the available supply of housing, taking account of environmental constraints.

3.23 Linked to this, the Strategic Housing Land Availability Assessment (SHLAA) provides specific details in relation to the availability of potential housing sites (i.e. housing land supply). The Strategic Housing Market Assessment (SHMA) provides additional information in relation to the types of homes which are needed based on the characteristics of population and affordability.



The Vision, Objectives and Strategic Policies

Table 3.1 Assessing housing need.

Stage 1 – identify objectively assessed need	a) Identify changes within the population – including births, deaths, migration in and out of the area, household size and make-up; age structure.	Modelling work originally undertaken in support of the former EoEP; confirmed 10,200 new homes needed for the period 2001-21. The projected residual need requirement for Suffolk Coastal is 7,900 from 2010 – 2027. Updated in 2010 by Oxford Economics (OE) forecast modelling; Identified 11,000 new homes needed for the period 2010-27.
	b) Identify and understand what is happening with the local economy and the impact on it of decisions taken at national and international level.	
	c) Combine data to provide forecast of number of new dwellings likely to be required (objectively assessed housing need).	
Stage 2 – identifying available supply	d) Identify land suitable for housing.	Including SHLAA sites identified in 2010, total suitable supply could amount to around 10,370 dwellings (from all sources). New call for sites will be made prior to work on the site specific allocations development plan documents.
	e) Apply judgements in relation to identified patterns of sustainable development in accordance with the core planning principles identified in the NPPF and test capacity of sites to accommodate new dwellings against objectively assessed need.	Taking into account current constrained supply, the CS proposed housing figure is at least 7,900 new dwellings between 2010 and 2027. A review of the CS will commence by 2015 to consider and identify land to meet the current acknowledged shortfall between the locally assessed requirement and the OE objectively assessed need as part of evidenced need for the district to 2031. <i>Note: the former EoEP required about 3,200 new dwellings in the IPA area by 2021. The Council remains committed to ensuring that this will be achieved.</i>

3.24 The Core Strategy has evolved over a number of years. The starting point for assessing housing need was originally the work completed and tested in support of the former EoEP with which the Core Strategy was previously required to conform and with which, the Council were fully in support. The former EoEP document identified new housing and job provision and also the necessary level of infrastructure to support it. Whilst that document has now been revoked, its contents and the evidence which supports it remains the common basis on which to take forward strategic planning in the short to medium term under the “duty to co-operate”.

3.25 The former EoEP required the Council to plan for a minimum of some 10,200 new homes in Suffolk Coastal over the period 2001-2021. This provision was split between the Ipswich Policy Area (IPA) (around 3,200 new homes) and the rest of the district (7,000 new homes). The IPA designation recognises that not all of the objectively assessed

housing need for Ipswich can be accommodated within its administrative boundaries.

3.26 A housing distribution strategy was determined to meet this level of need and finally agreed by the Council in March 2010. The former EoEP annual requirement of 510 homes per year was rolled forward beyond 2021 to enable the Council to identify a 15 year housing land supply within this Core Strategy. A continuation of the 510 per year results in an overall requirement (from 2010 to 2027) of some 8,670 new homes. A good record of housing delivery over the period from 2001 had however exceeded requirements and by 2010 (the base date for this Core Strategy) the residual annual rate of completions to meet that identified need had dropped to 465 per annum.

3.27 In response to changes to the planning regime announced in 2010, the Council took the opportunity to update and review its housing requirements. New, updated forecasts were commissioned from

Oxford Economics (OE). That forecast model identified a total housing need for the district for the period 2010 to 2027 of some 11,000 new homes (610 per annum). The projection also includes an element for vacant and second homes based on historic trends. It is this figure (11,000), which is taken to represent the current full, objectively assessed housing need as required by paragraph 159 of the NPPF.

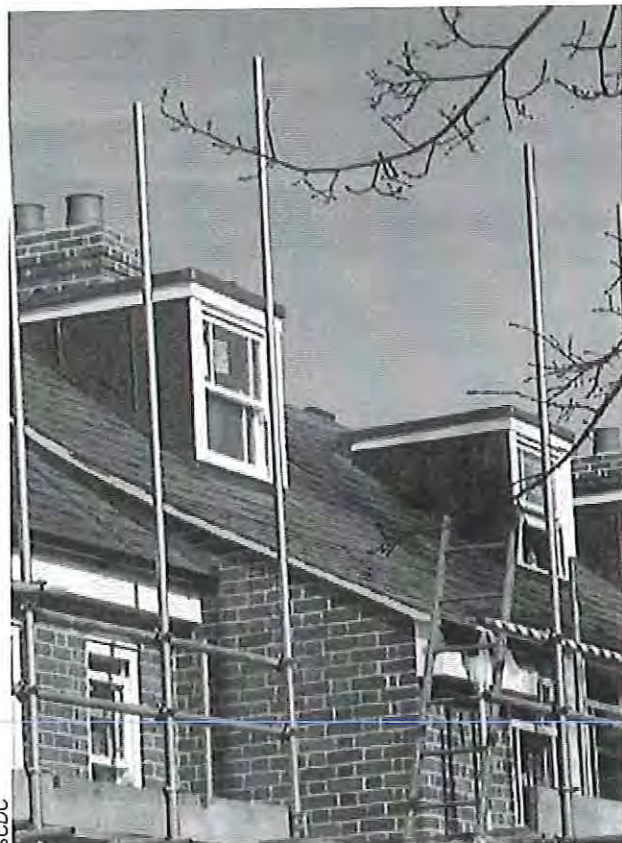
- 3.28 Critically, this review looked only at housing numbers. It did not involve any change to the housing distribution previously agreed which had been drawn up on the principles of sustainable development and sustainable communities. A dwelling led approach has therefore then been applied to that objectively assessed need, based on the supply of land identified as being suitable and available over the plan period and which accords with the housing distribution agreed in 2010. To do otherwise would have required a fundamental review of the Core Strategy at that stage and further delays to the adoption of the Core Strategy contrary to government advice. The adopted approach to the supply and distribution of land for new homes is therefore accompanied by a commitment to commence a review of the plan by 2015. The proposed review will begin with the publication of an 'Issues and Options' document and look to identify land to meet the acknowledged shortfall in provision compared to assessed need as well as any additional need arising by extending the plan period to 2031. This review date may be brought forward if this makes sense under "duty to co-operate". Table 3.2 shows that the strategy can deliver at least 7,900 new homes over the 17 year plan period.
- 3.29 This dual strategy (constrained allocations + plan review) represents a pragmatic but nonetheless positive and properly planned approach to housing delivery in support of projected economic growth. This also includes a commitment to continuing to meet the former EoEP identified housing need for the Suffolk Coastal section of the IPA.
- 3.30 In the longer term, a review will enable sufficient additional land to be identified against updated objectively assessed housing needs for the period to 2031. Those needs will have been re-assessed using information from the Census 2011 and updated information regarding performance of the local economy, particularly those sectors which have been identified as being of national significance. It is likely for example, that a decision will have been made with regard to any additional new nuclear development at Sizewell at that point.
- 3.31 Critically, it will enable the scales of new development (housing and employment) to be planned for on a wider strategic level under the "duty to co-operate" following the dismantling of the regional tier of policy making. Not least, specific consideration will need to be given at this stage to the capacity or otherwise of the strategic road network, work which will need to be done in conjunction with neighbouring authorities. The long term direction for housing growth or areas of search will need to be directed to those which provide the best opportunity to support the growing sectors of the economy, and would help to secure new or improved transport infrastructure. Longer term strategic decisions in relation to the capacity of the A14 Orwell Bridge will be an important factor in this regard (see Policy SP10). Individual and cumulative impact of development on the districts Natura 2000 sites which are of international importance for their nature conservation interest will also continue to require a wider strategic approach to future levels of development.
- 3.32 It will be noted that windfall is expected to provide a significant contribution towards overall housing provision. In a district as varied and as geographically large as Suffolk Coastal, this type of generally small, incremental provision is to be expected. Historic evidence confirms that this is the case. Typically, (but not exclusively) these types of sites in Suffolk Coastal are re-development of single large residential plots at a higher density; conversions of other types of building to residential use; or the sub-division of larger premises into a smaller number of flats.

Table 3.2 Calculating housing supply available

(a) Outstanding planning permissions deemed deliverable as at April 2010 (discounted by 10%)	1,480
(b) Identified brownfield potential (sites within existing physical limits boundaries)	230
(c) Outstanding housing allocations from previous Local Plan	80
(d) Estimated windfall (unidentifiable supply)	850
(e) SHLAA theoretical capacity	7,730
(f) Total available housing supply (2010 – 2027) (a + b + c + d + e)	10,370

The Vision, Objectives and Strategic Policies

- 3.33 In the short term however, between adoption of the Core Strategy and the adoption of the subsequent site allocations document (2015), larger housing sites will need to be brought forward to achieve a five year housing land supply. These sites also technically comprise "windfall" but will still be expected to accord with the principles, scale and distribution of development set out in this Core Strategy. In essence, they are sites which, but for timing, would have been allocated in the normal way.
- 3.34 The role of the Core Strategy is to set the principles which will guide future development in terms of scale and broad location. It is the role of the site allocations development plan documents, which will follow the adoption of the Core Strategy, to allocate individual sites. The housing numbers and distribution are however made in the confidence that there is a sufficient supply of deliverable or developable land for additional allocations to be made if more flexibility is required. Monitoring will also reveal whether targets have, or are likely to be met and inform the review regarding the need for further allocations.



SCDC

Strategic Policy SP2 – Housing Numbers and Distribution

The Core Strategy will make provision for at least 7,900 new homes across the district in the period 2010 to 2027 as set out in Table 3.3.

Land for new homes will be distributed in accordance with the Settlement Hierarchy (SP19), which is itself drawn up on the principles of sustainable development and sustainable communities.

New homes identified by means of specific allocations will be phased at a rate commensurate with the provision of any necessary new and improved infrastructure provision. For those areas where nature conservation issues are screened as important, phasing will also need to accord with agreed mitigation.

Further provision of new homes is expected to come forward across the plan period by means of windfall provision. This is likely to include small scale infill, conversions, or redevelopment of sites at a higher density; or by means of other small scale rural community led schemes for example new Community Right to Build or other rural exception provision. These types of schemes do not require specific allocation through the Local Plan but still have the potential to provide a mix of affordable and open market housing. It is anticipated that this unidentified housing supply could amount to around 50 homes per year.

An early review of the Core Strategy will be undertaken, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed housing needs for the District and proposals to ensure that this is met in so far as this is consistent with policies in the National Planning Policy Framework.

Housing Distribution

3.35 The Council must plan for delivery of the new homes taking account of such factors as:

- national policies; and
- other local circumstances and priorities.

For Suffolk Coastal District this means balancing the scale and location of new home provision with the areas potential contribution to the national economy (including where those jobs are situated); with limited local infrastructure particularly transport and coastal defence; whilst at the same time needing to maintain and enhance the quality of its built and natural environments, some of which are recognised as being of international importance for their wildlife.

3.36 National policy gives some further guidance on the distribution of housing based on the principles of sustainable development and sustainable communities, namely:

- (i) car dependency should be reduced by locating housing closer to employment, education, health facilities, shops, leisure and local facilities;
- (ii) the majority of new development should be located in and adjacent to the main urban areas;
- (iii) the role of market towns and large villages in providing employment and services to a rural

- hinterland should be sustained;
- (iv) careful examination of how a community or group of communities function is required; and
- (v) the quality and character of the rural areas should be protected.

The role of the Core Strategy is to translate these principles and issues to the local level. It has done this through the Settlement Hierarchy (Policy SP19), which identifies a range of settlement types throughout the district, and considers the development potential appropriate to each type. Table 3.3 sets out the proposed number of homes that can be delivered within the proposed housing distribution, without unacceptably harming the local and wider environment. It is through the strategy that some key economic drivers in the district may expand or increase ahead of the precautionary approach adopted. A key facet of the strategy is to acknowledge this by means of a commitment to a review which will appraise any new and updated evidence and if necessary plan for additional homes when required, in a distribution that meets longer term strategic planning objectives.

3.37 The following two tables summarise the Settlement Hierarchy and the distribution and anticipated sources of new homes within it. The detail can be found in Section 4 The Spatial Strategy.

Table 3.3 – Proposed housing distribution across the district 2010 to 2027

From: 2010 - 2027	Eastern Ipswich Plan Area	Felixstowe Walton & the Trimleys	Market Towns	Key & Local Service Centres	Rest of District	TOTAL
Outstanding planning permissions (discounted by 10%)	220	290	430	440	100	1,480
Identified previously developed land	0	30	150	50	-	230
Outstanding housing allocations from previous local plan	0	0	0	80	-	80
Windfall (unidentified provision)*	Included in total to right	Included in total to right	Included in total to right	Included in total to right	Included in total to right	850
New housing allocations	2,100	1,440	940	780	-	5,260
TOTAL	2,320 (136 p.a.)	1,760 (103 p.a.)	1,520 (89 p.a.)	1,350 (79 p.a.)	100	7,900 (465 p.a.)
% of new dwellings total	29%	22%	19%	17%	-	100%**

* Note: Some additional provision may come forward in the period to the adoption of a relevant site specific allocations document which will be considered having regard to the policies in the NPPF and other specific policies in this Core Strategy.

** Due to rounding figures may not total 100%

Table 3.4 – Percentage increase of existing housing stock from the Core Strategy

Area	Existing Housing Stock April 2010		Identified New Housing			Totals 2027 (existing stock + new housing)	
	Units	%	Units	% of new housing	Per annum	Units	% of total housing stock
Eastern Ipswich Plan Area	12,185	21%	2,320	29%	136	14,505	22%
Felixstowe Walton & the Trimleys	13,763	24%	1,760	22%	104	15,523	24%
Market Towns	11,789	20%	1,520	19%	89	13,309	20%
Key & Local Service Centres	16,771	29%	1,350	17%	79	18,121	27%
Other Villages and Countryside	3,503	6%	100	-	-	3,603	5%
District Windfall	-	-	850	-	-	850	-
District Total	58,011	100%	7,900	100%	465	65,911	100%

Note: due to rounding figures may not add up to 100%

Enabling a 15 Year Housing Land Supply

3.38 Paragraph 47 of the NPPF requires local authorities to set out the strategy and broad locations for continuous growth for 15 years, and illustrate the expected rate of housing delivery through a housing trajectory for the plan period. A housing implementation strategy is also required describing how a delivery of a five-year housing land supply will be maintained. Evidence of supply is provided in the Strategic Housing Land Availability Assessment (SHLAA).

3.39 The fifteen year period should be broken down as follows:

First 5 years: Sufficient specific, deliverable sites should be identified.

Second 5 years: Specific, developable sites should be identified.

Final 5 years: Where possible specific, developable sites should be identified. Where it is not possible to identify specific sites broad locations for future growth should be indicated.

3.40 “**Deliverable**” means the site is available now, is suitable and housing is achievable within the 5 year period.

3.41 “**Developable**” sites should also be suitable and with a reasonable prospect that the site could be developed at the point envisaged.

Phased Delivery of New Housing

3.42 For monitoring purposes allocations are phased in order to demonstrate a continuous 15 year supply of housing land in accordance with national policy. The base date for the phasing of new housing allocations is taken to be 1/4/2012 (The updated position at Examination). There will then be three periods each of 5 years. The target is to maintain a regular and consistent supply of housing over each of the phases to support anticipated growth in the local economy, and the provision of any necessary new and improved infrastructure. The Strategy proposed acknowledges that the provision of housing is less than the forecast modelling indicates. The Council is confident however, that there is sufficient land to meet the first two phases of the plan but acknowledges that if some of the key economic drivers and other factors accelerate there needs to be appropriate

time to review a potential increase in the number of homes proposed for the end of phase 3 and beyond and where they would best be located. For these additional numbers and future growth post 2027. This is likely to require a change of direction from the current distribution strategy. The Council is committed to a review of the CS which will commence with the publication of an Issues and Options document and which will extend the plan period to 2031.

3.43 Prior to 2017, new housing completions are expected to comprise outstanding planning permissions; potentially the outstanding housing allocation at Rendlesham, and other smaller scale community led housing schemes for which no specific allocation is required. (See Table 3.2).

3.44 The proposed indicative phasing of allocations (on both 'brownfield' and 'greenfield' land) is shown in Table 3.5. An updated housing trajectory (see Appendix B) will be provided annually as part of the Annual Monitoring Report. The precise site locations and associated phasing of housing delivery will be set out in supporting Development Plan Documents (Site Specific Allocations or Area Action Plans).



Table 3.5: Delivery of New / Potential* Allocations

	Dwellings	Nature of Housing Allocations
PHASE 1: 2012-2017	1,560	Specific, deliverable
PHASE 2: 2017-2022	2,340	Specific, developable
PHASE 3: 2022-2027	1,360	Specific, developable & Broad location
TOTAL	5,260	

Years are from 1st April to 31st March

* Potential allocations refers to sites which accord with the Core Strategy, but which may be brought forward ahead of the adoption of a site specific allocations development plan document.

Target for Previously Developed 'Brownfield' Land

3.45 National planning policy continues to emphasise the need to make effective use of land by re-using land which has been previously developed provided that it is not of high environmental value. The priority will be to find and allocate previously developed brownfield sites if at all possible with "greenfield" sites being developed second. Given the nature of the district, however, few sizeable brownfield land opportunities exist. The supply of small sites has also diminished following the Government announcement that residential gardens should now be considered to be greenfield. What does exist however, are previously developed "greenfield" sites e.g. old

farm complexes, piggeries etc some of which could usefully be considered for redevelopment having regard to the overall strategy for the district. When looking to allocate sites these will be considered ahead of "new" greenfield land.

3.46 The Council now proposes a nominal target of 12% of homes on brownfield land given:

- The lack of previously developed land;
- The need to consider the retention of sites in employment use given their contribution towards the strategy for the rural economy.

The Vision, Objectives and Strategic Policies

Objective 3 - New Homes

To provide for the full range of types and locations of new homes to meet the needs of existing and future residents of the district.

3.47 **Summary Outcomes:** New homes will be provided of a type, size and tenure appropriate to the needs of the district including supported housing for vulnerable groups, established through research and monitoring. New affordable homes for rental and assisted purchase will be created. The level of need will be monitored through updates to the Local Housing Needs Assessment study. Where there is a demonstrable requirement for a particular type of property e.g. smaller home, these will be made available. Other needs will also need to be addressed such as those of the local Gypsy, Traveller and Travelling Showpeople communities.

House Size, Type and Tenure

3.48 In addition to ensuring a supply of housing land it will also be necessary to ensure that the size, type and tenure mix of housing built in Suffolk Coastal is reflective of its needs over time.



SCDC

Strategic Policy SP3 – New Homes

The strategy will be to increase the stock of housing to provide for the full range of size, type and tenure of accommodation to meet the needs of the existing and future population, including Gypsies, Travellers and Travelling Showpeople. This includes providing housing that will encourage and enable younger people to remain in the district, but also addresses the needs of what is currently an ageing population.

In doing so, maximum use will be made of the existing stock through conversion, adaptation or extension and targeting new provision to meet identified shortfalls and longer term needs.

Such provision is to be made in a manner that addresses both the immediate needs of the local resident population and the longer-term, future needs of the population, in accordance with the principles of sustainable development and sustainable communities.

3.49 To achieve this, the general starting point will be that all housing developments of 5 or more units, will be expected to provide a mix of house types, sizes and tenures that meet the profiles set out in the Strategic Housing Market Assessment (SHMA) and Local Housing Assessment. On large allocations made in the LP (Site Specific Allocations or Area Action Plan documents) a guide to the mix of house types and sizes appropriate to that site and situation, will be provided by the Council in consultation with the local community and the developers through a Development Brief.

3.50 As a general rule across the district the proportions shown in Table 3.6 should be sought in terms of house size. These have emerged from the Local Housing Assessment. The achievement of these targets will be monitored.

Table 3.6 Target proportions of house sizes

Bedrooms	1	2	3	4+
Open market housing	6%	32%	39%	22%
Affordable housing	43%	31%	16%	11%
All sectors	13%	32%	35%	20%

*Due to rounding columns may not add up to 100%
Table to be updated on a regular basis to reflect latest published guidance*

Affordable Housing

3.51 'Affordable Housing' is defined in Annex 2 of the NPPF as:

3.52 Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

3.53 **Social rented** housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

3.54 **Affordable rented** housing is let by local authorities or private registered providers of social housing to households who are eligible for social housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

3.55 **Intermediate housing** is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

3.56 Homes that do not meet the above definition of affordable housing, such as "low cost market" housing, may not be considered as affordable housing for planning purposes.

3.57 The Council commissioned a Local Housing Assessment, completed in July 2006, which identified the affordable housing need of the district as 24% of all new homes. Policies SP1, SP19, DM1 and DM2 provide the framework within which to provide the estimated 1,896 affordable homes required over the period 2010 to 2027. The breakdown of these homes will be:

- 75% affordable rented homes and
- 25% other affordable homes

These targets will be monitored and may be modified to take account of up-to-date housing needs surveys through the plan period.

3.58 The targets will be achieved primarily by two means (see Policies DM1 and DM2):

i) As a proportion of new housing developments granted consent. These will normally be within the physical limits boundary (village envelopes) and will include a proportion of the allocations made in the Site Specific Allocations and Area Action Plan Development Plan Documents. 1 in 3 new homes provided will be required to be an affordable one. The threshold at which the policy comes into play is:

- 3 new homes in Key Service Centres, Local Service Centres (see Settlement Hierarchy); and
- 6 new homes in Major Centres and Market Towns.

ii) 'Exception' sites are sites that have not been allocated and would not normally receive planning permission (normally because they lie outside the "village envelope"). Here, all of the homes should be affordable ones. However, a maximum of one in three homes could be a home for sale on sites put forward by parish councils through parish plans. The actual number will depend upon local circumstances, local need and the overall viability of the scheme. Exception site provision may also come forward under the new proposed Community Right to Build, or other small scale local schemes. Demonstrated local support for the scheme will be crucial in all instances.

Strategic Policy SP10 – A14 & A12

The A14 is an important route on the European map providing a link from the Port of Felixstowe to the remainder of the UK and its markets. Ensuring that it continues to function as a strategic route is of national and international significance. Off-site Port related activities should be located on or well related to this transport corridor.

However there are issues around the capacity of the road around Ipswich, particularly that section between the Seven Hills interchange and Copdock including the Orwell Bridge, where the A12 and A14 combine into a single route. This section is also heavily used by local traffic. The Council will work with adjoining authorities and the highways agencies to consider the options in respect of improving capacity and flow, concentrating initially on reducing the impact of local traffic on this route through traffic management type measures, but longer term including the possibility of new routes should this prove necessary.

The A12 is a valuable artery running north to south through the district connecting the rural areas with the primary route network and the rest of the country. It is essential to the local economy as a tourist route and to serve the Low Carbon Energy corridor between Sizewell and Lowestoft but journey times are hampered by stretches of single carriageway north from Woodbridge and reduced speed limits, necessary to maintain quality of life for those living immediately alongside the route, all of which need continuing enhancement.

Subject to conformity with other elements of the strategy, particularly in respect of the environment, the Council supports the provision of improvements to the A12 (north of Woodbridge) including as a first priority, provision of a by-pass or other solution for Little Glemham, Marlesford, Farnham and Stratford St Andrew the "four villages" where the road is particularly narrow and twisting with buildings located very close to it.

Improvements to the A12 south from its junction with the A1214 at Martlesham to the Seven Hills interchange will be required in conjunction with strategic employment and housing development proposed east of the A12 with funding provided by means of developer contributions.

Accessibility

3.120 An integral part of the strategy to ensure that the A14 and A12 can continue to operate effectively as strategic routes is to better manage local traffic movements. This requires a multi-faceted approach.

- Location of new development - The Settlement Hierarchy directs new development and service provision to the larger settlements;
- New and improved foot and cycle provision – generally associated with new development, investment will be directed initially to improving and extending the foot and cycle network where these can provide easy access to a range of local facilities e.g. employment, schools, leisure facilities or local shops thereby offering for a range of short journeys a realistic alternative to use of the car and thereby contributing to improving people's health as well as reducing CO2 emissions;
- Improving and investing in public transport - Improvements include upgrading and updating public transport interchanges, bus and rail terminals; using developer contributions to secure up-graded or new public transport routes; and identifying key public transport links both within and between settlements. The need for bus routes to provide access particularly to employment sites has been identified as required between Martlesham and Ipswich; Martlesham and Felixstowe; Martlesham and Woodbridge and between Felixstowe and Ipswich and within Felixstowe to provide access to the docks.

3.121 Across the more rural parts of the district, a range of innovative approaches are being promoted and rolled out which will enable young people and others to access their nearest local town during the day and in the evening e.g. to visit the cinema. Such schemes also have an important role to play in addressing issues such as rural isolation.

Public Transport – Rail

3.122 In addition to improving facilities at stations, a proposal by the rail operator to upgrade the service on the east Suffolk line between Ipswich and Lowestoft, has seen the introduction (December 2012) of an hourly service between Ipswich and Lowestoft. This level of service will make rail a realistic alternative to use of the car or bus for some journeys, with the potential to help relieve traffic on the A12.

The Vision, Objectives and Strategic Policies

- 3.123 The Felixstowe railway line is also an important freight route. A number of improvements are required to this route as part of the port expansion works. Putting more freight on the railway will also help to limit the amount of container traffic on the A14.
- 3.124 Securing improvements will take place both incrementally as and when public funds become available and more specifically in conjunction with major new development proposals, particularly those noted for the area east of A12 at Martlesham and at Felixstowe/Walton and Trimley villages. The Council will work with neighbouring authorities; highway authority, transport service providers, developers and others to facilitate these improvements.



Strategic Policy SP11 – Accessibility

In order to make the best use of capacity within the local and strategic road and rail networks serving the district, to support the District's strategic economic role both within the sub-region and nationally, to maintain quality of life and to contribute to reducing the impact of CO2 on climate change, the District Council will work with neighbouring authorities, the highway authority, public transport providers, developers and others to maximise opportunities for local journeys to be made by means other than the private motor car.

In relation to public transport this will include improving both the quantity and quality of the service on offer. **In relation to foot and cycle provision this will mean securing safe and easy access to local facilities where walking or cycling offers a realistic alternative for most people.**

Where new services and facilities are to be provided by means of developer contributions in association with new developments their timely provision will be secured by means of conditions, legal agreements and/or through the Community Infrastructure Levy (CIL) (once a charging schedule has been adopted).

The transfer of freight from road to rail will also be encouraged.

THE ENVIRONMENT

Objective 9 – Climate Change

To adapt to and mitigate against, the potential effects of climate change, and minimise the factors which contribute towards the problem.

- 3.125 **Summary Outcome:** *In accordance with national and global priorities, addressing the impact of climate change will be at the forefront of this Core Strategy. This will include addressing impacts internally generated by new development, as well as enabling communities to mitigate and adapt to wider impacts such as sea level rise. As a low lying coastal area parts of the district are particularly vulnerable to rising sea levels, as well as being susceptible to flooding from the numerous inland rivers and estuaries. The area is also well placed and contributes to energy production at the national and more local level and is part of a low carbon energy corridor.*
- 3.126 *The Council will work with partners to protect and involve the district's communities and minimise new development in vulnerable areas. More generally, it will use the planning system and other partnership-led initiatives – low energy use, sustainable construction methods, alternative modes of travel etc - to minimise the impact of climate change and reduce the carbon footprint of the district and to help meet national reduction targets.*

Strategic Policy SP12 – Climate Change

The District Council will contribute towards the mitigation of the effects of new development on climate change by:

- Ensuring development minimises the use of natural resources by utilising recycled materials where appropriate, minimises greenhouse gas emissions, incorporates energy efficiency, encourages the use of public transport, helps to reduce waste and minimises the risk of pollution;
- Encouraging and promoting schemes which create renewable energy where consistent with the need to safeguard residential amenity, the environment and the landscape;
- Minimising the risk of flooding and ensuring appropriate management of land within flood plains; and
- Improving the process of estuary and coastal management, incorporating and integrating social, recreational, economic, physical and environmental issues and actions;

The approach towards sustainable means of construction is addressed in the Design section (Chapter 5) of this Core Strategy.

Renewable Energy

3.127 The Climate Change Act 2008 aims to encourage the transition to a low carbon economy in the UK through unilateral legally binding emissions reduction targets. This means a reduction of at least 34% in greenhouse gas emissions by 2020 and at least 80% by 2050. Suffolk Coastal District Council signed the Nottingham Declaration on Climate Change in October 2006 and committed to producing its own climate change strategy for reducing CO₂ and other greenhouse gas emissions which was agreed in November 2009.

3.128 The Government has estimated that around one third of the country's carbon emissions come from energy generation. Through paragraphs 95 – 98 of the NPPF, it promotes and encourages schemes that utilise renewable energy resources. This should be in tandem with energy efficiency measures, particularly in new development (also see Development Management Policy DM24 on Sustainable Construction). The National Policy Statement on Energy (EN1) also indicates a need for new nuclear provision as a low carbon technology.

3.129 The Suffolk Coastal area can contribute towards the generation of renewable energy, most notably through biomass schemes and wind power including turbines and landing points to serve off-shore provision. The former will generally be supported, subject to the consideration of proposals for associated buildings and grid connections. The cumulative impact of energy proposals will have potentially significant impacts on the Suffolk Coastal countryside and the Council will be working closely with government and other agencies to ensure grid issues are not resolved incrementally. In respect of wind power the district's environment is a sensitive one and needs protection. As the concept of renewable energy is promoted at national level, the option of resisting wind power generation entirely is not appropriate. Instead, the Core Strategy will apply national policy on the subject and generally encourage the generation of renewable energy, most notably to serve local communities, but seek to protect the environmental assets of the area. See Policy DM24.

Nuclear Power

3.130 The Government has confirmed in publishing the National Policy Statements EN1 and EN6 that new nuclear power stations will be necessary if the UK is to meet its carbon reduction targets and meet the nation's energy needs. Decisions on the potential locations of any new nuclear power stations will be taken at national level and the various regulators would assure safety, security and radiological issues of design proposals.

3.131 The role of the planning process will be to consider the suitability of any specific proposal and the mitigation of local impacts only i.e. the Examination into new nuclear installations will not be expected to focus on the merits or otherwise of nuclear power.

3.132 Sizewell is one of the locations formally identified as a potential site for new nuclear provision and will be considered as part of the national strategic assessment. If an application for an additional nuclear station were to be made, it would be submitted to the Planning Inspectorate (or its successor body) under the Planning Act 2008; with any decision being taken by the Secretary of State. The Council would be a statutory consultee. The timeframe for construction of a new nuclear power station should it go ahead would be within the timeframe of this Core Strategy. It is therefore appropriate for this Core Strategy to consider the local issues (that would, for example, inform the Local Impact Report) and how these issues

Other Sources of Pollution

- 3.139 In respect of air pollution, the Council has declared two Air Quality Management Areas (AQMAs). These are located at specific areas in Felixstowe and Woodbridge. The Council is working on action plans to hopefully secure improvements. Whilst there are no other AQMA identified, there is a potential conflict in siting new development close to the main road networks. Care will need to be taken to ensure that the scale and location of new development does not create new problems that could result in additional AQMAs having to be declared. This may influence the location and mix of uses on potential development sites.
- 3.140 It is considered that other pollution issues such as those relating to noise, odour and light which can add to the pressures caused by climate change, can be adequately dealt with under generic development management policies, or other legislation. The Core Strategy policies in relation to the siting and potential change of use of existing employment sites are particularly relevant in this context (Policies DM10 & DM12).

Objective 10 – The Coast

To secure the continuing prosperity and qualities of coastal areas and communities, whilst responding to climate change and the natural processes that occur along the coast.

- 3.141 *Summary Outcome: Planning for, and adaptation to, the consequences of climate change on coastal areas will be carried out by:*
- the co-ordinated application of policies and resources to enable key social, economic and environmental assets to be safeguarded where feasible;
 - enabling assets and infrastructure (including economic and social infrastructure) to be substituted or adapted where it is not feasible and /or desirable to safeguard them in their current location; and
 - the risk to people and property being managed to acceptable levels.
- 3.142 The district's coast is under threat from the sea. It is also a unique area where social, economic, and environmental issues need to be addressed. The approach to the future of the coastal area is set out in Policy SP30 The Coastal Zone, Objective 9 and Policy SP12 Climate Change.

Objective 11 - Protecting and Enhancing the Physical Environment

To conserve and enhance the quality of the distinctive natural, historic and built environments including ensuring that new development does not give rise to issues of coalescence.

- 3.143 *Summary Outcome: To promote a spatial strategy that protects and enhances as far as possible the distinctive and valued natural and historic landscape, and the built environment of the district. To ensure, in particular, that where strategic new development takes place appropriate compensatory and mitigatory measures are secured to ensure that any adverse impacts are limited and that it does not result in coalescence of settlements.*

Biodiversity and Geodiversity

- 3.144 Biodiversity and geodiversity are acknowledged as being of major importance within the district. Biodiversity means the variety of life forms, the ecological roles they play, and the genetic diversity they contain. The coastal areas, in particular, are designated as being of international importance for their wildlife interest, especially over-wintering birds. Biodiversity is important in Suffolk Coastal because of the extent and range of sites and habitats in the district as set out in Table 3.8 overleaf. These comprise sites of international/national importance (Special Protection Areas (SPA), Sites of Special Scientific Importance (SSSIs), Special Areas of Conservation (SACs) and Ramsar) as well as more locally important habitats such as County Wildlife Sites or Local Nature Reserves. Whilst these designated areas are provided with protection, the potential exists nonetheless for all new developments to look at ways of increasing or protecting biodiversity.
- 3.145 In 1992 the UK was one of 157 nations to sign up to the Convention on Biological Diversity. In 1994 the UK Biodiversity Action Plan was published confirming the Government's commitment to the principles and requirements of the Convention. The Government recognises that a Biodiversity Action Plan has been prepared for Suffolk.

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This includes all relevant habitats and species that are identified in the UK Action Plan along with a number of Suffolk 'character' species that had been identified during the process of public consultation. The Suffolk Biodiversity Action Plan is available on the Suffolk Biodiversity Partnership website, www.suffolkbiodiversity.org.

3.146 Geodiversity may be defined as the natural range of geological features (rocks, minerals, fossils, and structures), geomorphologic features (landforms and processes) and soil features that make up the landscape. It includes their assemblages, relationships, properties, interpretations and systems. The district contains the following two Regionally Important Geological Sites (RIGS):

- i) Dunwich Cliffs;
- ii) Dunwich Heath Cliffs.

3.147 The Council is duty bound to afford protection to areas designated for their geodiversity and biodiversity interest with the highest levels of protection going to those areas of international and national importance. These will be identified on the Proposals Map. The issue in relation to the Core Strategy will be to ensure that sufficient regard is had to these areas when identifying levels and scales of new development to be accommodated throughout the district. Whilst some of the broad locations identified for development are included at this level, it is more of an issue to be addressed at the Site Specific Allocation or Area Action Plan stage where development will, wherever possible, avoid such areas if impact is deemed to be significant and mitigation measures are impractical.

3.148 Overall, the strategy for biodiversity and geodiversity will be for them to be protected and enhanced using a framework based on a network of:

- Designated sites (international, national, regional and local);
- Corridors and links;

- The rivers, estuaries and coast; and
- Habitats and species identified in the Suffolk Biodiversity Action Plan and Suffolk Local Geodiversity Action Plan.

Opportunities may also be created in conjunction with the green infrastructure network proposed under Policy SP17.

Strategic Policy SP14 – Biodiversity and Geodiversity

Biodiversity and geodiversity will be protected and enhanced using a framework based on a network of:

- Designated sites;
- Wildlife corridors and links;
- The rivers, estuaries and coast;
- Identified habitats and geodiversity features;
- Landscape character areas; and
- Protected species.

Sites of European importance, which include Special Areas of Conservation and Special Protection Areas are statutorily protected under the Conservation of Habitats and Species Regulations 2012 (based on EU directives), and wetlands of global importance (Ramsar sites) are protected by Government policy to apply the same level of protection as to European sites.

More generally, the policy approach to development on sites designated for their biodiversity or geodiversity interest is set out in Policy DM27.

The Suffolk Biodiversity Action Plan and Suffolk Local Geodiversity Action Plan will be implemented. The Strategy will also be to contribute to county targets through the restoration, creation and on-going management of new priority habitats as identified in those documents.

Table 3.8 Areas of Wildlife Importance

Site type	No. of sites
Wetland of International Importance (RAMSAR)	4 (7,917 ha)
Special Protection Area (SPA)	4 (7,917 ha)
Special Area of Conservation (SAC)	5 (3,755.4 ha)
Sites of Special Scientific Interest (SSSI)	45 (10,630 ha)
County Wildlife Sites (CWS)	206 (5,682 ha)
Local Nature Reserve (LNR)	3 (64.9 ha)



Historic Environment

- 3.149 The importance of buildings and places is recognised as contributing to peoples' general quality of life. The district contains a rich historic legacy. Its historic market towns and villages together with their landscape settings, archaeology, individual buildings and groups of buildings, and historic street patterns all add to the social and cultural history of the area.
- 3.150 In relation to the built environment, the designation of conservation areas, scheduled ancient monuments, historic parklands and the listing of buildings are all issues that can be addressed outside of the Local Plan process. The role of the Core Strategy in relation to these topics will be to provide general advice supporting their retention and enhancement whilst minimising any significant adverse impacts upon them. Section 12 of the NPPF supports this aim and will be applied rigorously. More generally, decisions on development proposals affecting heritage assets will be informed as appropriate by Conservation Area Appraisals, information from the Historic Environment Record and Archaeological Assessments.
- 3.151 As a separate exercise, each of the current 34 designated conservation areas is being examined in a Conservation Area Appraisal, to be adopted as Supplementary Planning Documents. In accordance with good practice the Council will also strive to maintain a register of listed buildings at risk and action will be taken against owners where appropriate.
- 3.152 In addition, where detail is particularly important when considering individual development proposals, more specific advice is provided in Section 5 under Design.

Landscape

- 3.153 The district contains a variety of landscape types, all of which contribute to the quality of its environment. The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and Heritage Coast are designated as being of national importance. These areas will be protected, not only because of their visual qualities but also for their tranquillity and ambience, particularly relevant in the secluded parts of the coast.
- 3.154 The district also contains other land that is designated at the county level as being important for its landscape value (river valleys and estuaries), the Special Landscape Areas (SLA) as well as landscape types identified through the Suffolk Landscape Character Assessment (LCA). Those other parts of local importance will be designated as such, being a key asset for local people and visitors.
- 3.155 LCA recognises the merits of the landscape character types that have resulted from the differences in a range of features including field and settlement patterns, biodiversity, soils, cultural heritage and local building materials. The Council considers it important that these different character areas are conserved and enhanced, but that this must be integrated with the need to accommodate change in order to address social or economic objectives and meet the needs of communities. In doing so it will be necessary to ensure that not only is harm to the environment minimised, but also that opportunities are taken to bring about improvements wherever possible. This applies whether the initiative for change is brought about by land management decisions or new development.
- 3.156 Any decision that may be taken in the longer term to either delete or amend the SLA designation, would be based on the findings of the Landscape Character Assessment and the success in

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implementing any guidelines generated by it. The success or otherwise of this approach will be monitored. In the meantime, the SLA boundaries will continue to apply and these will be set out in the relevant site allocations and area specific policies documents.

Townscape

3.157 Townscape is considered to be equally important and within urban areas the impact of any development, whether in a conservation area or not, will be particularly relevant. The cumulative impact of apparently small changes within a street scene can result in significant impact e.g. removing front garden walls and tiled paths from a terrace of Victorian properties. Townscape is also very often a reflection of the history of the town or village and helps define and shape particular communities and neighbourhoods.

3.158 Design policies are contained elsewhere in this Core Strategy but the role of particular gaps and gardens in the street scene will be protected where necessary. Sites, gaps, gardens and spaces that make an important contribution to a particular location in their undeveloped form will be identified and protected where known in the Site Allocations and Area Specific Policies, Area Action Plan or Neighbourhood Plan Development Plan Document. Until then, those areas currently designated under Policy AP28 Areas to be Protected from Development in the "saved" policies of the Suffolk Coastal Local Plan (incorporating 1st and 2nd alterations) will continue to be protected.

3.159 More generally, the setting of settlements within their wider landscape context is an important function in defining and maintaining quality of place and identity. Across the district there are many instances where the space between settlements or smaller, more isolated groups of buildings, makes an important contribution to sense of place and where the introduction of new development could result in coalescence, or the perception of coalescence (for example ribbon type development) and should be avoided. This principle will be applied by the Council in its Site Specific; Area Action Plan or Neighbourhood Plan DPD.

Strategic Policy SP15 – Landscape and Townscape

The policy of the Council will be to protect and enhance the various landscape character areas within the district either through opportunities linked to development or through other strategies.

In addition to the protected landscape of the AONB, the valleys and tributaries of the Rivers Alde, Blyth, Deben, Fynn, Hundred, Mill, Minsmere, Ore, Orwell and Yox, and the designated Parks and Gardens of Historic or Landscape Interest are considered to be particularly significant.

Many of the towns and villages in the district are of distinctive historical and architectural value, as well as landscape value and character, and the Council will seek to enhance and preserve these attributes and the quality of life in the generality of urban areas.

This strategy will extend to towns and villages where sites, gaps, gardens and spaces that make an important contribution to a particular location in their undeveloped form will be identified and protected where known; or more generally avoided where development in these locations would lead to coalescence. The location of such sites will be designated through the Site Allocations and Area Specific Policies, Area Action Plan or Neighbourhood Development Plan Document. Until then those sites currently allocated under "saved" Policy AP28 in the Suffolk Coastal Local Plan (incorporating 1st and 2nd Alterations) will continue to be protected.

Objective 12 – Design

To deliver high quality developments based on the principles of good, sustainable and inclusive design.

3.160 **Summary Outcome:** *Ensuring that whenever new development takes place, a high priority is given to design, not only in terms of the aesthetics but also function, energy efficiency, risk of crime etc. and the celebration of local distinctiveness.*

3.161 *Good quality design makes an area attractive to live in and encourages inward investment by business. In terms of housing, it will be tailored to meet the immediate and lifetime needs of local people.*

COMMUNITY WELL-BEING

Objective 13 – Accessibility

To promote better access to, housing, employment, services and facilities for every member of the community.

3.166 **Summary Outcome:** *To enable improved access to healthcare, leisure, education, training, employment and other services, when measured against national standards. Working in partnership, this will be achieved by a combination of:*

- the retention and enhancement of appropriate key local services such as village post offices and shops, as well as district and local centres;
- improvements to key transport links;
- where appropriate, co-ordinating access arrangements with other relevant service agencies and service providers; and
- the creation of additional or improved provision in association with, and to support, new development.

3.167 *Those residents of Suffolk Coastal considered to require particular attention include younger and older people, those who are disadvantaged, those in remote rural areas and those living in the relatively deprived areas of Saxmundham, Leiston and the southern parts of Felixstowe.*

3.168 Pockets of deprivation in some of our rural, coastal and urban areas are often obscured by average district level data. In our rural areas, social exclusion can be disproportionately influenced by limited access to services, as even the most basic of community services such as grocery shops, banks and doctors' surgeries may be difficult to reach. The loss of local facilities like those from small towns, villages or neighbourhood centres leads to a significant number of residents being socially excluded. Lack of services therefore impacts on the vibrancy and cohesion of communities. Living in a rural area should not present unreasonable barriers to accessibility of services. Building socially inclusive, sustainable, thriving and supportive communities is vital in these isolated rural areas. In principle, the Council will support community initiatives under the Community Right to Buy that would secure the long term future of these types of facilities locally.

3.169 For young people in particular, rural isolation needs to be tackled head on to overcome access issues to education and training, and to ensure that young people can access a range of positive activities and social networks. Elsewhere in the Core Strategy support is provided for the roll out of high speed broadband across the district. Support is also provided for suitable schemes which are designed to meet the transport needs of young people in rural areas at times when they most require it. Concentrating transport investment in key public transport links and expanding innovative schemes, such as the Suffolk Dial-a-Ride transport on demand, are critical parts of the overall strategy.

3.170 The strategy for access to services falls into three strands:

- (i) Working jointly with service and transport providers to promote better access for every member of the community, particularly younger and older people, those who are disadvantaged, those in remote rural areas, and families to housing, employment, services and facilities;
- (ii) Using the Settlement Hierarchy to ensure that, wherever possible, homes are not created in locations with poor access to essential services; and
- (iii) Using Development Management Policies and this Core Strategy as evidence for service providers (including potentially the local community) to secure the necessary investment to facilitate the retention of appropriate local services, including post offices and shops in villages and district centres.

Objective 14 – Green Infrastructure

To encourage and enable the community to live and enjoy a healthy lifestyle; to promote urban cooling (e.g. shading from trees, canopies on buildings to cool down areas and buildings in urban settings) in major settlements as well as support biodiversity and geodiversity.

3.171 **Summary Outcome:** *Access to green space is important for people's mental and physical well-being. Green spaces also have a function to play in helping to adapt to climate change and can be used to form green corridors which can benefit and boost wildlife. In addition, the*

creation of new green infrastructure is required to mitigate the impact of new development, to provide alternative recreation/leisure space for existing and new residents, to help relieve pressure on the estuaries and their populations of over-wintering birds.

- 3.172 *A comprehensive green infrastructure network will be achieved by establishing and maintaining a network of accessible good quality play spaces, sport and recreation facilities (including allotments) based on established standards. In addition there will be a growing network of natural green spaces across the district based upon local standards to be created.*
- 3.173 *Opportunities for the local population to live and enjoy a healthy lifestyle will be encouraged through improved access to these areas. Partnership working to identify and provide for missing links within the public rights of way network serving these areas will be encouraged.*

Sport and Play

- 3.174 Both the Council, through its corporate strategies, and the Local Strategic Partnership through the Sustainable Community Strategy, promote the concept of healthy communities. The Core Strategy seeks to ensure that the community is as healthy as possible by providing / promoting opportunities for it to live a healthy lifestyle. One of the ways of achieving this, and hence an important role for the LP, is to ensure the provision of areas for active play, sport and recreation, or as set out below in relation to green spaces, areas for quieter, more informal leisure pursuits.
- 3.175 Play space can be broken down into the two elements, play areas for children's use (including equipped playgrounds and casual kick-about areas) and sports grounds for youth and adult use (including pitches, greens and courts). There are national standards for the provision of such play space, related to population size. The Council has carried out an audit of all facilities in every community and identified deficiencies. This was done in consultation with the communities themselves and is updated on an annual basis.
- 3.176 In addition, given the age structure of the population, more specific provision should be made for sport and leisure activities available to the general public but designed to meet the needs of older people.

- 3.177 Specific provision will need to be made in association with new housing development.

Strategic Policy SP16 – Sport and Play

The appropriate provision, protection and enhancement of formal and informal sport and recreation facilities for all sectors of the community will be supported, particularly where shortfalls in local provision can be addressed and it accords with local requirements.

The standard to be used in the calculation of play space (both children's play areas and sports pitches) will be the national standard of 2.4 hectares per 1000 population. Deficiencies have been identified in an audit of current provision, prepared in association with town and parish councils, and updated annually.

In respect of new housing proposed under Policies SP20 and SP21 and meeting future needs the Council will rely on the information contained in the relevant community infrastructure studies completed in 2009.

Green Space

- 3.178 It is widely accepted that natural green spaces are an essential resource in creating an agreeable quality of life. This is particularly important within urban environments where parks and open spaces can be wildlife havens, places for quiet relaxation, places for healthy exercise, or focal points for community interaction. Green open spaces also contribute to the character of any urban or rural settlement. Natural green space includes parks and other open spaces such as commons, 'green corridors', and areas of ecological interest over which there is public access.
- 3.179 Dependent on the size and type of green space, it can serve a variety of purposes, and help meet the needs of local populations and much wider e.g. Rendlesham Forest provides a useful resource for residents of Ipswich and elsewhere. To help provide a strategic approach to such provision the following standards have been identified locally through the Haven

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Gateway Green Infrastructure Strategy as follows:

- 2ha+ of accessible natural green space (ANG) within 300m of home – the Neighbourhood Level;
- 20ha+ of ANG within 1.2km of home – the District Level;
- 60ha+ of ANG within 3.2km of home – the Sub-regional Level;
- 500ha+ of ANG within 10km of home – the Regional Level.

3.180 Deficiencies across the Haven Gateway sub-region (which contains all of the Suffolk Coastal towns with the exception of Framlingham) have been identified in the Haven Gateway Green Infrastructure Strategy. A further study to identify provision and deficiencies across the rest of the district has been undertaken. This further study takes forward suggestions from each of the two studies to provide a range of suggested actions which could be pursued across Suffolk Coastal District. This "Green Infrastructure Strategy" will form the basis of the implementation of green infrastructure provision in the LP.

3.181 The role of green infrastructure is important not only in the strategic sense for supporting healthy, sustainable communities which meet the above standards of provision but also as an environmental resource to balance or reduce recreational pressure on sensitive areas. The district is rich in high quality landscape and wildlife areas which are also sought after for recreational enjoyment leading in some areas to tensions and pressures. New development will produce additional demand upon the existing green infrastructure resources which will need addressing, particularly in terms of managing any potential additional impacts upon these sensitive areas.



SCDC

Strategic Policy SP17 – Green Space

The Council will seek to ensure that communities have well-managed access to green space within settlements and in the countryside and coastal areas, in order to benefit health, community cohesion and greater understanding of the environment, without detriment to wildlife and landscape character. Where adequate green space is not provided as part of a development, developer contributions will be sought to fund the creation of appropriate green space and/or management and improvement of access to green space. In particular, the Council will work on green infrastructure opportunities with partners in strategic housing growth areas in order to suitably complement development proposals. Developer contributions will be secured by means of conditions, legal agreements and/or through the Community Infrastructure Levy (CIL) (once a charging schedule has been adopted).

Objective 15 – Physical and Community Infrastructure

To ensure that, as a priority, adequate infrastructure such as transport, utilities or community facilities are provided at an appropriate time, in order to address current deficiencies and meet the needs of new development.

3.182 **Summary Outcome:** To identify needs and deficiencies in public, voluntary and commercial service provision and seek new approaches to meeting those needs, in order to address deficiencies. Where appropriate allocations of land for specific uses will be made.

It will also be essential to ensure that all new development is supported by appropriate infrastructure, and that providers / funders are clear as to their responsibilities.

3.183 The Council identifies two types of infrastructure:

- Physical infrastructure—This includes transport facilities, water supply, foul and surface water sewage, drainage, waste disposal and utilities (gas, electricity and telecommunications). Flood defence is considered elsewhere.
- Community infrastructure – Services and facilities which provides for the health and

wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. It is generally provided by the public and voluntary sectors.

- 3.184 The main driver of the requirement for new or improved infrastructure is the combination of housing and population growth. The main issues in respect of such provision are securing the necessary funding and ensuring that provision is appropriately phased. Key to the provision of appropriate infrastructure will be partnership working with the providers and engaging local communities prior to detailed negotiations with developers.
- 3.185 Where current infrastructure is inadequate to meet the needs of new development, developers will be required to fund new or improved infrastructure that is directly related to those needs. This is especially important when considering proposed large-scale allocations of housing land but equally applies to small-scale development proposals across the district given its potential cumulative impact. Already during the LP process the following providers have indicated that developer funding will be necessary if standards are to be maintained: transport, education, primary health care, police and play/open space. For the scales of development proposed east of the A12 and at Felixstowe Walton and Trimley villages, separate community infrastructure studies have been undertaken to establish the scale of provision required to serve them.
- 3.186 The provision of infrastructure is strongly related to the implementation and monitoring part of this document (Section 6).

Strategic Policy SP18 – Infrastructure

The infrastructure required in order to service and deliver new development must be in place or provided at the required phase of the development.

Generally, the Council will seek to identify needs and deficiencies in public, voluntary and commercial service provision and seek new approaches to meet those needs and address deficiencies. This will entail the provision of funding from local and national government sources as well as the private sector.

Pending the introduction of a Community Infrastructure Levy (CIL), an approach will be taken whereby developer contributions, commensurate with the scale and impact of the development proposed, are sought for services and facilities considered to be the highest priority and for which alternative sources of funding are the most difficult to find. Once introduced, CIL will become the primary means of securing off-site contributions.

In respect of specific proposals such as housing allocations, the necessary infrastructure will be identified and costs estimated in order that its provision can be tied into and phased with the development itself, and a means of transferring costs to the developer created, where alternative sources of funding are not available.

Infrastructure prioritisation will be contained within Supplementary Planning Documentation and a CIL Infrastructure List (Regulation 123 list).



SCDC

INTRODUCTION

4.01 Spatial planning is more than just a map. It:

- Works within a wider context than simply the use of land, looking also at how communities function and how they interact and relate to the physical environment which surrounds them;
- Considers the concept of 'place', including local distinctiveness and local opinion;
- Puts into place those other pieces of the jigsaw, including such aspects of life as the environment, communication, social well-being, the economy, and overall quality of life of individuals and communities; and
- Looks at the provision of infrastructure necessary to support existing communities and potential for future development.

SETTLEMENTS

SETTLEMENT HIERARCHY

4.02 The most important "places" that the spatial strategy addresses, are considered to be the 100+ individual towns and villages across the district, because these provide the location for homes, jobs, services etc. Their character and location provide other historic and cultural links between the communities and their built and natural environments. They are a key component of the high quality environment that this district enjoys and which it is a stated priority to maintain.

4.03 Whatever the size and location of a community, too much development too soon, or of the wrong type, can damage the environment and local distinctiveness, and thereby impact on people's perceived quality of life. Establishing a Settlement Hierarchy is a useful policy tool for identifying a range of possible spatial development options which reflect both the needs and, where appropriate, the aspirations of the individual local communities in a manner which recognises their form and function, whilst at the same time providing for the scales of development identified through this Core Strategy to meet district needs to 2027. The Settlement Hierarchy, therefore, accords with both the principles of sustainable development / sustainable communities and national policy guidance on sustainable development whilst reflecting the diverse character and pattern of local communities.

4.04 Within the Hierarchy, the town and village settlements are categorised according to sustainability factors including size, level of facilities and their role in relation to locality and

neighbouring communities, as well as their physical form. Scale and types of development are then specified across a range of uses considered necessary or appropriate for any community within each level of the hierarchy, to enable it to continue in its current role or to reinforce or achieve the role identified. As such, accordance or not with the hierarchy is the first issue of principle to which any future site allocation or individual development proposal should accord.

4.05 To further facilitate and guide the location of development at the larger settlements, **physical limits boundaries (or "village envelopes")** will be drawn up. It should be noted that physical limits boundaries are a policy tool and do not necessarily reflect the full extent of the town or village. Indeed where allocations are proposed, these will be sited outside of the settlement "envelopes". The "envelopes" will be re-drawn to include them once the site has been developed. In essence they serve to differentiate between the more built up areas, where development will normally be considered acceptable, and the countryside (Policy SP29), where development will be strictly controlled in accordance with national planning policy guidance and otherwise not permitted unless in conformity with the strategy for the countryside as set out in Policy SP29, which includes other small scale, locally supported schemes.

4.06 In addition, where opportunities are still extremely limited within physical limits, there may be the possibility of development in surrounding 'clusters' of houses (Policy DM4). The new Community Right to Build may offer the opportunity for additional provision however the full details of this scheme have yet to be finalised.

4.07 The following policy, which defines the Settlement Hierarchy, is, therefore, considered to be one of the 3 key policies, the other two being Climate Change (Policy SP12) and Sustainable Development (Policy SP1) around which the remainder of the Core Strategy is built.

Strategic Policy SP19 – Settlement Policy

The identification of a **Settlement Hierarchy** is a key tool with which the Council will achieve its Vision for the district in 2027, meeting the scales of development as set out in this Core Strategy whilst maintaining and enhancing the quality of the built, natural, historic, social and cultural environments in a manner which accords with the nationally defined principles of sustainable development and sustainable communities.

The Settlement Hierarchy as set out below and amplified in the accompanying Policies SP20 to SP29 as well as Tables 4.1 and 4.2 will be used in determining the scale of development appropriate to a particular location:

Settlement Type	Description	Proportion of Total Proposed Housing Growth
Major Centres	Sub-regional centre for commercial and social facilities.	51%
Eastern Ipswich Plan Area		(29%)
Felixstowe/Walton & the Trimley villages		(22%)
Towns	Focal point for employment, shopping and community facilities. A transport hub.	19%
Key Service Centres	Settlements which provide an extensive range of specified facilities.	17%
Local Service Centres	Settlements providing a smaller range of facilities than the key service centres.	
Other Villages	Settlements with few or minimal facilities.	Minimal
Countryside	The area outside the settlements above, including the hamlets and small groups of dwellings that are dispersed across the district.	

Footnote: *windfall (unidentifiable small sites) is expected to add to the new housing provision in the district.

**Community Right to Build and other small scale locally supported schemes are anticipated to provide a significant number of new homes across the rural areas but these do not require specific allocation and are therefore not included within this policy.

Table 4.1 – Settlement Hierarchy Classification

Settlement Type	Scale and level of existing facilities	Settlements		
Major Centre	Sub-regional centre for commercial and social facilities	Felixstowe Area East of Ipswich i.e. Kesgrave, Martlesham Heath, Purdis Farm; Rushmere St Andrew (excluding village)		
Town	Focal point for employment, shopping and community facilities. A transport hub	Aldeburgh, Framlingham, Leiston, Saxmundham, Woodbridge (with parts of Melton & Martlesham)		
Key Service Centre * settlement considered capable of accommodating more strategic levels of growth	Settlements which provide an extensive range of specified facilities, namely most or all of the following: <ul style="list-style-type: none"> • Public transport access to town • Shop(s) meeting everyday needs • Local employment opportunities • Meeting place • Post office • Pub or licensed premises • Primary school • Doctors surgery 	Alderton Blythburgh Bramfield Darsham Dennington Earl Soham Eyke Grundisburgh Hollesey Knodishall Martlesham (village) Melton (village) Orford	Otley Peasenhall (with part of Sibton) Rendlesham Snape Trimley St Martin* Trimley St Mary* Westleton Wickham Market Witnesham Yoxford	
Local Service Centre	Settlements providing a smaller range of facilities than Key Service Centres. At least 3 from: <ul style="list-style-type: none"> • Public transport access to town • Shop(s) meeting everyday needs • Local employment opportunities • Meeting place • Post office • Pub or licensed premises 	Aldringham Badingham Bawdsey Bucklesham Benhall Blaxhall Brandeston Bredfield Bruisyard Butley Campsea Ashe Charsfield Chillesford	Dunwich Easton Hacheston Hasketon Kelsale Kirton Little Bealings Little Glemham Marlesford Middleton Nacton Parham Rendham	Rushmere St. Andrew (village) Shottisham Stratford St Andrew Sutton Heath Theberton Thorpeness Tunstall Ufford Walberswick Waldringfield Wenhaston Westerfield
Other Village	Settlements with few or minimal facilities	Boyton Bromeswell Chediston Clopton Cransford Cratfield Cretingham Falkenham Farnham Foxhall	Friston Great Bealings Great Glemham Heveningham Huntingfield Kettleburgh Levington Melton Park Newbourne Pettistree	Playford Saxtead Sudbourne Sutton Sweffling Tuddenham Walpole

Settlement Type	Scale and level of existing facilities	Settlements		
Countryside	The area outside the settlements above, including the hamlets and small groups of dwellings that are dispersed across the district	Boulge Brightwell Burgh Capel St Andrew Cookley Culpho Dallinghoo Debach	Gedgrave Hemley Hoo Iken Letheringham Linstead Magna Linstead Parva Monewden Ramsholt	Sibton Sizewell Sternfield Stratton Hall Swilland Thorington Ubbeston Wantisden

Table 4.2 Summary - Scale of Development Appropriate To Each Tier of the Settlement Hierarchy

Housing	Employment	Retail
Major Centres (Policies SP20 – SP21)		
<p>Allocations of large scale development to meet strategic needs. General location of such allocations identified in the Core Strategy.</p> <p>Within the defined physical limits, development to be permitted in the form of:</p> <ul style="list-style-type: none"> • Estates, where consistent with local character; • Groups; • Infill. <p>Affordable housing provision:</p> <p>(a) One home in three within allocations;</p> <p>(b) One in three homes in all developments of 6 homes or more in size.</p> <p>Specific policy guidance available for specific major centres.</p>	<p>Allocations of large scale sites to meet strategic employment needs.</p> <p>Identification of concentrations of employment uses as General Employment Areas.</p> <p>Recognition that local employment areas exist (but are not identified) where further development may be permitted.</p> <p>Some new small scale business/ service use (B1/A2 provision appropriate within allocated housing areas, linked to local/ district service centres).</p> <p>Emphasis on retention of existing employment providers.</p>	<p>Town centre – identified at Felixstowe. Encourage a range of provision – A1, A2, A3 including convenience stores, supermarkets, comparison goods – through redevelopment if necessary.</p> <p>District Centres – to be identified.</p> <p>Martlesham Heath – existing out of centre retail park and superstore. Potential for expansion limited due to impact on neighbouring retail centres.</p> <p>Emphasis on protecting existing centres.</p>
Market Towns (Policies SP22 – SP26)		
<p>Allocations in the form of estate scale development if appropriate and where consistent with the Core Strategy.</p> <p>Within the defined physical limits, development to be permitted in the form of:</p>	<p>Identification of concentrations of employment uses as General Employment Areas.</p> <p>Recognition that local employment areas exist (but are not identified) where further development may be permitted.</p>	<p>Town centres identified at Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge. Should incorporate a range of provision – A1, A2, A3 including convenience stores, supermarkets, comparison goods.</p>

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Housing	Employment	Retail
<ul style="list-style-type: none"> • Modest estates, where consistent with local scale and character; • Groups; • Infill. <p>Affordable housing provision:</p> <ul style="list-style-type: none"> (a) One home in three within allocations; (b) One in three homes in all developments of 6 homes or more in size; (c) 100% of exception sites on the edges of the physical limits of the town. <p>Specific policy guidance available for specific market towns.</p>	<p>Range of general and local employment opportunities.</p> <p>Emphasis on retention of existing businesses and areas in employment use to provide opportunities both for expansion and re-use.</p> <p>Opportunities to improve and expand on the existing tourism offer will generally be encouraged where they would be in sympathy with the character and scale of the town.</p>	<p>Emphasis will be on retaining range of provision to meet the needs of the town and its hinterland whilst supporting their role as local tourist centres.</p> <p>Emphasis on protecting existing centres.</p> <p>Specific policy guidance available for specific market towns.</p>
Key Service Centres (Policy SP27)		
<p>Allocations in the form of minor extensions to some villages to meet local needs.</p> <p>Within the defined physical limits, development in the form of:</p> <ul style="list-style-type: none"> (i) Modest estate-scale development where consistent with scale and character; (ii) Groups; (iii) Infill. <p>Small scale developments within or abutting existing villages in accordance with the Community Right to Build or in line with Village Plans or other clearly locally defined needs with local support.</p> <p>Affordable Housing provision:</p> <ul style="list-style-type: none"> (a) One in three homes in all developments of 3 homes or more in size; (b) On exception sites on the edges of the physical limit boundaries. 	<p>General employment in larger settlements.</p> <p>Emphasis on local employment in the smaller ones.</p> <p>Emphasis on retention of existing businesses and areas in employment use to provide opportunities for expansion and start-up.</p>	<p>Small range of comparison and convenience shopping.</p> <p>Emphasis will be on retention of existing provision.</p>

Housing	Employment	Retail
Local Service Centres (Policy SP27)		
<p>Allocations in the form of minor extensions to some villages which are consistent with their scale and character</p> <p>Within the defined physical limits development as appropriate normally in the form of:</p> <p>(i) Groups; or</p> <p>(ii) Infill.</p> <p>Small scale developments within or abutting existing villages in accordance with the Community Right to Build or in line with Village Plans or other clearly locally defined needs with local support.</p> <p>Affordable Housing provision</p> <p>(a) One in three homes in all housing developments of 3 homes or more in size;</p> <p>(b) On exception sites on the edges of the physical limits boundaries.</p>	<p>Emphasis on local employment</p> <p>Where provision exists emphasis will be on retention. Potential for expansion likely to be limited due to environmental and infrastructure limitations.</p> <p>New provision most likely to be provided through conversion/re-use of existing buildings and have tangible links to the local area.</p>	<p>Convenience shopping mainly. This could include provision in the form of a farm shop, or similar linked / ancillary to another use.</p> <p>Emphasis will be on retention of existing provision.</p>
Other Villages* (Policy SP28)		
<p>No physical limits and very limited development.</p> <p>Small scale developments within or abutting existing villages in accordance with the Community Right to Build or in line with Village Plans or other clearly locally defined needs with local support.</p> <p>Infill housing to meet agreed and evidenced local need and where there is an aspiration in a parish plan to become a sustainable settlement.</p>	<p>Existing employment where it exists is linked predominantly to agricultural industry or other rural businesses.</p> <p>Emphasis will be on retaining existing uses.</p> <p>Farm diversification and tourism uses may be appropriate.</p>	<p>Where no provision currently exists this situation is unlikely to change.</p> <p>Farm shops or similar.</p>
Countryside* (Policy SP29)		
<p>No development other than in special circumstances.</p> <p>Infilling in clusters well related to sustainable settlements.</p>	<p>Employment where it does exist is predominantly linked to agriculture or forestry.</p> <p>Farm diversification schemes and tourism uses may be appropriate.</p>	<p>Where no provision currently exists this situation is unlikely to change.</p> <p>Farm shop or similar.</p>

*Note that windfall sites may occur in settlements classified as Others Villages & Countryside but they are unidentifiable.

Estate	A number of dwellings, in excess of 5, related to a new estate road or linking to the existing road system.
Group	Generally not more than 5 dwellings related one with another, utilising an existing road frontage, or short cul-de-sac road.
Infill	The filling of a small undeveloped plot in an otherwise built up frontage. A "small undeveloped plot" is one that would normally be filled by one or two dwellings.

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KEY AND LOCAL SERVICE CENTRES

Introduction

4.82 It is the major centres and five market towns to which the bulk of new development and growth will be directed. Outside of these there is a diverse network of communities of varying size and character that sit within the wider countryside to which they relate historically, culturally and economically.

4.83 Key and Local Service Centres represent the communities with, respectively, a wide and narrow varying range of facilities and services. It is to these settlements that development would next be directed.

4.84 New housing development in such settlements would have the advantages of creating affordable housing as well as aiding the viability of such local facilities as shops and post offices. However, the scale and location of such development would require careful consideration given environmental issues and the potential impact on their character.

4.85 Such housing can be enabled through the defining of village envelopes (to be referred to as "physical limits boundaries") so that an element of flexibility is introduced and small scale developments can be permitted. In addition, where "village envelopes" are tightly drawn, some flexibility can be introduced by permitting infill development within 'clusters' of housing that are well-related to settlements. However, for the purposes of establishing a 15 year land supply such development is deemed to represent 'windfall' and can only form a limited part of the calculations. Allocations will be necessary.

4.86 Such allocations will have the prime purpose of achieving housing to meet local needs, an objective supported by many communities in the district. They will be restricted to those Key and Local Service Centres where:

- local housing need has been demonstrated; and
- there is community support.

4.87 The allocations will be phased across the three periods of the Strategy with an objective of achieving about 780 newly allocated homes of which 260 would be affordable homes. The scale of each allocation will be consistent with the size and nature of the settlement. In larger Key Service Centres these could be as much as 30 homes, down to 10 homes in the smaller ones. An exception may be Rendlesham where there is an outstanding allocation of about 75 homes. Wickham Market is another larger settlement where larger scale development may be possible.

4.88 Small scale allocations may be made within other Local Service Centres where there is local support for this. Otherwise it is expected that these settlements will continue to grow organically but within defined village envelopes. Throughout phases 1 and 2 'windfall' will occur at a regular rate but for the purposes of the Core Strategy it has not been taken into account.

4.89 Overall, therefore, between 2010 and 2027 the number of houses to be created in Key and Local Service Centres from all sources including allocations, brownfield and outstanding planning permissions will be 1,350 homes as set out in Table 4.6 (although no doubt this will be higher given the exclusion of windfall).

4.90 The new Community Right to Build and other small scale locally supported schemes offer local communities the opportunity to provide new homes where there is a majority of local support. The former are not subject to allocation but offer the potential to provide additional homes across the rural settlements (see Table 4.2).

4.91 In relation to service provision, the approach is one of retaining existing levels of service and community provision as well as working in partnership with service providers to provide new and innovative ways of servicing the local community.

4.92 In a similar fashion to the approach taken to 'clusters' (see Policy DM4) for the provision of new housing, the conversion of other rural buildings or complexes such as old farm buildings, to employment or similar use is more likely to be

Table 4.6 Key & Local Services Centres – Homes to be built up to 2027

Outstanding Planning Permissions	Identified Previously Developed Land	New Allocations	Allocations from Current Local Plan	TOTAL
440	40	780	80	1,350

acceptable where these are located on the edge of or close to the defined physical limits boundaries and where this would support the functioning of the local community. Other specific Policies will also apply.

- 4.93 These centres will also be the focus for public transport provision with key links identified between them and the higher order centre.

Strategic Policy SP27 – Key and Local Service Centres

The strategy for the communities outside of the Market Towns and the Major Centres and identified as Key and Local Service Centres is to:

- (a) retain the diverse network of communities, supporting and reinforcing their individual character;
- (b) permit housing development within defined physical limits or where there is a proven local support in the form of small allocations of a scale appropriate to the size, location and characteristics of the particular community. An exception may also be made in respect of affordable housing in accordance with Policy DM1;
- (c) promote the combination of open market and affordable housing in order to encourage and enable young and old the opportunity to remain within their local communities;
- (d) enable organic development to occur in respect of settlements where opportunities within defined physical limits are severely limited. This may be in the form of the inclusion of potential sites within physical limits boundaries when they are drawn, or development within adjacent 'clusters' (see Policy DM4) subject to defined criteria;
- (e) secure the provision of services and facilities required to meet the day to day needs of the local population, primarily at locations within the Key Service Centres but supported by increased access provision to enable residents of the smaller settlements to utilise them; and
- (f) work with partners to address the issue of rural isolation through the innovative use of alternative transport other than by private motorcar, as well as improved communication technologies.

OTHER VILLAGES

- 4.94 "Other Villages" are the settlements scattered across the district that do not have any, or have few, facilities and services, relying totally on the higher order centres to meet their day-to-day needs. They will not have physical limits boundaries drawn and to a considerable extent are considered as forming part of the countryside, contributing significantly to the overall character of the rural parts of the district.

- 4.95 Whilst these village communities might be considered non-sustainable, they are, nonetheless, small communities that generate their own needs. In terms of housing provision, national policy guidance already allows for exceptions linked to business in these areas. That approach will still apply. A further exception will be allowed locally in these areas in an attempt to maintain the social fabric of these more isolated communities which are, nonetheless, very much part of the make-up of the district. For this reason affordable housing will be permitted which meets an identified local need where its provision is supported by a parish plan or statement or Local Housing Needs Survey. The new Community Right to Build would also apply to these settlements (see Table 4.2).

- 4.96 In addition to Other Villages there are settlements with no physical form, being a scattering of properties or clusters of properties, even though together they form a parish. These, together with all other hamlets and clusters will be considered to form part of the 'Countryside' (see Policy SP29).



SCDC

Development Management Policy DM1 – Affordable Housing on Exception Sites

Exceptionally, the District Council may be prepared to permit a small residential development in order to meet a particular local need for affordable housing for those whose incomes are too low to buy in the open market and for whom there is insufficient rented accommodation which cannot be provided in any other way:

- On a site which abuts or is well-related to the physical limits boundary of a Market Town, Key Service Centre or Local Service Centre; or
- Within an 'Other Village' where its scale is in keeping with its setting.

Such provision will be subject to the following criteria:

- (a) Any proposal will be considered in relation to the scale and character of the settlement, availability of services and facilities, highway safety, effect on the surrounding countryside and residential amenity;
- (b) The local need for affordable housing shall first have been quantified within an area to be agreed by the District Council, which will have regard to the Suffolk Coastal Local Housing Assessment, the Strategic Housing Market Assessment and any Parish/Community Led Plan;
- (c) The site shall be subject to a legal agreement with the District Council, which provides for permanent control and management of properties to ensure their retention for local need.

Where, through its Parish Plan/Community Led Plan or local housing needs survey a parish, has identified a demand for local need affordable housing and has identified an 'Exception Site' that has not been allocated and would not normally receive planning permission, provision is made for a maximum of one in three units to be open market, to act as an incentive to landowners to release their land.

Footnote: Where it is necessary to look beyond the boundary of a single parish, the next area of search would be the adjacent parishes. See also Map 3 Housing Market Areas.

Affordable Housing on Residential Sites

5.09 Lack of affordable housing provision within the district is a major problem. Despite new housing being built above target rates, the provision of affordable housing as part of this new housing stock has historically been distinctly lacking. On the 31st March 2006, the Council adopted 2nd Alterations to its Suffolk Coastal Local Plan incorporating stronger affordable housing policies to begin to address the identified need. This was later supported by a Housing Assessment in 2006.

5.10 Land Registry figures have shown that, despite the recent recession, average house prices within the district have risen overall by 119% (£138k) between 2001 and 2010. In Suffolk Coastal, the average income of residents in full time or part time employment was £26,102 for 2009. The Suffolk county equivalent is £23,849. Notwithstanding this relatively high local average wage, there are considerable disparities in earnings within the district, with much of the population in the northern more rural sector reliant on low wages linked to the prevalence of the agricultural industry, tourism and hospitality and social care. The housing affordability ratio across the district averages around 8-9 times the difference between house prices and incomes, which was endorsed by a Housing Needs Assessment in 2006.

5.11 The Council commissioned a Local Housing Assessment, completed in July 2006, which identified the affordable housing need of the district as 24% of all new homes. Policies SP1, SP19, DM1 and DM2 provide the framework within which to provide the estimated 1,896 affordable homes required over the period 2010 to 2027. The breakdown of these homes will be:

- 75% affordable rent; and
- 25% other affordable homes.

Policy DM2 sets out how this can be achieved.

5.12 Based on the proportions arising from the survey, the following targets will be set for affordable housing provision over the plan period 2010 to 2027:

- 1,422 affordable rented units (75% of 1,896);
- 474 other affordable (25 % of 1,896).

Development Management Policy DM2 – Affordable Housing on Residential Sites

In considering planning applications for the development of:

- Six or more additional housing units in Major Centres and Towns; or
- Three or more additional housing units in Key Service Centres and Local Service Centres.

Whether in total or in phases, the District Council will expect 1 in 3 units to be affordable housing unless its provision is not required due to:

- (a) Lack of identified local need in the area;
- (b) Site conditions, suitability and economics of provision.

The District Council will need to be satisfied as to the adequacy of arrangements to ensure that these homes are offered to local people who can demonstrate need, at a price which they can afford, and that its enjoyment is by successive, as well as initial, occupiers.

In exceptional circumstances, where the District Council and the developer consider that a site is not suitable to accommodate an element of affordable housing, the District Council will expect a financial or other contribution towards the provision of affordable housing on a different site within the same area.

Footnote: "Affordable Housing" is defined in paragraph 3.51.

HOUSING IN THE COUNTRYSIDE

Generally

- 5.13 The new Community Right to Build opens up the opportunity for rural communities to provide new housing to address local needs where there is a majority of local support. As noted elsewhere in the document the Community Right to Build schemes are not subject to specific allocation, and potentially do not require specific planning permission but could be agreed by the parish council. Other locally derived small scale schemes would however require planning permission. The following policies bring together the various types of other residential development for which planning permission would be required where a case may be put forward to justify residential development in the countryside. This overarching

policy first and foremost stresses that such development will be strictly controlled and should be guided by a recognised need.

- 5.14 The Council intends to produce a Supplementary Planning Document on development in the countryside.

Development Management Policy DM3 – Housing in the Countryside

New housing will firstly and primarily be directed to, and integrated within, the settlements for which physical limits boundaries have been defined or in accordance with Policy SP19. In the interests of safeguarding the countryside as set out in Policy SP29 as well as meeting sustainable objectives, new housing in the countryside will be allowed where it comprises:

- (a) Replacement dwellings on a one to one basis where they are no more visually intrusive in the countryside than the building to be replaced;
- (b) The sub-division of an existing larger dwelling where this would meet a local need;
- (c) Affordable housing on 'exception' sites in accordance with Policy DM1;
- (d) Conversions of existing buildings subject to certain controls (Policy DM13);
- (e) Minor infilling within clusters of dwellings well related to existing sustainable settlements (Policy DM4); or
- (f) Development which would otherwise accord with the special circumstances outlined in paragraph 55 of the National Planning Policy Framework.

Particular care will be taken in respect of residential annexes to ensure that, through design and/or planning conditions, annexes are not able to be separated from the main building in order to create a separate dwelling.

Accommodation for Gypsies, Travellers and Travelling Showpersons may be permitted in accordance with Policies SP4 and DM9.

Housing Clusters

- 5.15 The historic pattern of development in Suffolk Coastal consists not only of market towns and villages but a patchwork of small hamlets and clusters in the countryside. Some small scale development in the form of single plots can be expected to cater for local housing needs because they enable local persons to stay in their communities.

Static Holiday Caravans, Cabins and Chalets

5.45 Parks for chalets and static caravans make an important contribution to the overall provision of tourist accommodation in Suffolk Coastal. They also make an important contribution to the local economy, however they can have a marked visual impact on the landscape, particularly those sites set out in regimented patterns in open countryside, and on the coastline. This impact is compounded, in that they are present on an all-year-round basis. It is therefore, important to direct their provision away from the more sensitive locations within the district.

5.46 In recent years there has been a significant increase in the quality of cabins and chalets available, while satisfying the definition of what a caravan is under the Caravan Sites and Control of Development Act 1960. It is important that this type of accommodation is not abused and used as permanent accommodation. To address this, the Council will restrict the length of occupancy periods permitted.

Development Management Policy DM18 – Static Holiday Caravans, Cabins and Chalets

In respect of sites for static holiday caravans, cabins, chalets and similar accommodation, proposals for new sites, extensions to existing sites, and intensification of use of existing sites (by infilling) will be acceptable where:

- (a) The road network is able to accommodate the volume of traffic generated without having a significant adverse impact on the free flow of traffic and highway safety;
- (b) They are of a scale appropriate to the nature of the location and its setting. In this respect the cumulative impact will also be a material consideration;
- (c) They are of a high standard of design;
- (d) They are to be used as holiday accommodation only, and not for permanent residential accommodation; and
- (e) There are services available (i.e. the provision of mains water and adequate sewage/waste disposal).

The above sites will not be allowed within the Heritage Coast, adjoining estuaries, within exposed parts of the AONB or where they would have a material adverse impact on the landscape.

Where planning permission is granted, a condition will normally be imposed to ensure that no holiday unit on the site shall be occupied by the same person(s) for 56 days or more in a calendar year.

TRANSPORT

PARKING STANDARDS

5.47 The Council has adopted the Suffolk Advisory Parking Standards which set out the parking standards for the district. These standards take into account the location and availability of public transport in addition to distinguishing between rural and urban areas. It is intended to update and produce this as a Supplementary Planning Document.

Development Management Policy DM19 – Parking Standards

Proposals for all types of new development will be required to conform to the District Council's adopted parking standards as set out in a Supplementary Planning Document.

However, in town centres and other locations with good access to public transport the District Council may make exceptions as a transport management tool or where it is impracticable to make parking provision on-site.

In such cases the Council may also, in order to allow the development to proceed, invite applicants to contribute to the provision of cycling provision, walking measures, public transport, or additional public car parking spaces in lieu of any shortfall in on-site car parking provision.

Footnote: In relation to Leiston see also paragraph 4.63



SCDC

TRAVEL PLANS

5.48 'Travel Plan' is a general term for a package of measures tailored to the needs of individual sites, developments or companies and is aimed at promoting more sustainable travel choices and reducing reliance on the private car. Travel Plans help reduce the impact of travel on the environment. They can also help make people healthier, cut down delays caused by congestion, improve access and enhance the working and living environments. Travel Plans can be an important tool in ensuring that development will not result in the capacity of the existing road network being reduced.

5.49 Travel Plans should be submitted with more complex planning applications that are likely to have significant transport implications. These measures need not necessarily be exclusive to large scale developments. They might also include small developments which generate significant amounts of travel close to Air Quality Management Areas (AQMA's), or in locations where a reduction in road traffic is necessary for road safety reasons. The Core Strategy needs to set out the circumstances and thresholds which make Travel Plans necessary.

Development Management Policy DM20 – Travel Plans

Proposals for new development that would have significant transport implications should be accompanied by a 'green travel plan'. It is not necessarily the size of the development that would trigger the need for such a plan but more the nature of the use and would include:

- (a) new employment sites employing over 10 people;
- (b) a use which is aimed at the public (e.g. retail, leisure activities); or
- (c) major residential development.

The travel plans should seek to reduce the use of private cars by:

- (i) encouraging car sharing;
- (ii) provide links to enable the use of public transport;
- (iii) improve road safety for pedestrians and cyclists; and
- (iv) identify any mitigation works to be funded by the developer in conjunction with the proposal, such as improvements of facilities at the nearest transport interchanges.

A condition or a legal agreement will be imposed to ensure implementation of the travel plan.

Footnote: 'Major' residential development in this case is 100 or more dwellings.



THE ENVIRONMENT

DESIGN

Aesthetics

5.50 High Quality design should be sought for all types of development irrespective of location (be it in an urban, rural, designated or non-designated area) within the district. Achieving good design is not, and should not be, dependent on the wording of a policy but rather the policy should serve to highlight what needs to be addressed. National policy refers to various documents on good practice produced by government departments and Design Council CABE (Commission for Architecture and the Built Environment). Professionals working in property development should have knowledge of these.

5.51 The NPPF highlights the importance of high quality design. It states (paragraph 56):

“Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”

5.52 The district is very fortunate in having a very high quality environment reflected in its designated national landscape and historical built up areas. This district has a distinctive character which includes non-designated areas.

5.53 The design policies below set out and establish benchmarks by which proposals will be assessed, to provide a starting point for, and provoke, informed discussion. Through these criteria, the Council will seek to highlight and identify the importance of local character and distinctiveness. In many cases, however, Supplementary Planning Documents (SPD) will be more appropriate to address certain locations and specific types of development. These SPDs will cover the following topics:

- extensions to homes and other development within a residential curtilage;
- guidance on small scale residential development of up to five homes;
- shop fronts, signs and advertisements;
- historic building repairs, alterations and extensions;
- lighting;
- conservation area appraisals; and
- development in the countryside, including guidance on replacement and extensions to homes and the re-use and adaptation of rural buildings.

Development Management Policy DM21 – Design: Aesthetics

Proposals that comprise poor visual design and layout, or otherwise seriously detract from the character of their surroundings will not be permitted. Development will be expected to establish a strong sense of place, using streetscenes and buildings to create attractive and comfortable places to live, work and visit. Accordingly, development will be permitted where the following criteria are met:

- (a) proposals should relate well to the scale and character of their surroundings particularly in terms of their siting, height, massing and form;
- (b) in areas of little or no varied townscape quality, the form, density and design of proposals should create a new composition and point of interest, which will provide a positive improvement in the standard of the built environment of the area generally;
- (c) alterations and extensions to existing buildings should normally respect the plan form, period, style, architectural characteristics and, where appropriate, the type and standard of detailing and finishes of the original building;
- (d) in order for extensions to existing buildings to be acceptable, particularly on those that are considered to be architecturally and historically important (including vernacular architecture) and those located in sensitive locations, the extension shall be visually ‘recessive’ and its size and design shall be such that the original building will remain the more dominant feature on the site;
- (e) layouts should incorporate and protect existing site features of landscape, ecological, heritage or amenity value as well as enhance such features e.g. habitat creation; and
- (f) attention must be given to the form, scale, use, and landscape of the spaces between buildings and the boundary treatment of individual sites, particularly on the edge of settlements.

The District Council will support and strongly encourage the conservation of energy and the use of alternative and renewable sources of energy in the design and layout of proposals for new buildings and conversion of existing buildings, provided it would not seriously detract from the character of the area.

In considering residential development, the District Council will have regard to Supplementary Planning Documents that have been adopted.

Function

- 5.54 Good design is not just about how the development looks but also how it works. The functional requirements of a development are an essential part of good design and should be addressed at the earliest stage of the design process. Changes in practice with regard to the recycling of household waste and the resulting need to accommodate larger bin storage areas, is one such example of the functional requirement of design.
- 5.55 Access to buildings and arrangements for their use by the public, including disabled people, are important planning matters.
- 5.56 ODPM/Home Office Safer Places:- The Planning System and Crime Prevention 2004 combined with the Crime and Disorder Act 1998 places an obligation on local planning authorities to do all they can to prevent crime and reduce the fear of crime. The design of new development can play an important part in community safety.
- 5.57 More guidance on design is given in the CABI publication, 'By Design' (ODPM and CABI 2000) which refers to both residential and commercial development and the companion guide to (former) national policy PPS3 'Better Places to Live: By Design' (2001). Both these publications highlight the standards of design that the Government is seeking to achieve in new development.



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Development Management Policy DM22 – Design: Function

Proposals should make provision for their functional requirements. Planning permission will be granted for new development if the following criteria are met:

- The design and layout of the development provides and maintains **safe and convenient access for people with disabilities**;
- New development **generally** makes **adequate provision** for public transport, **cars, cycling, garages, parking areas, access ways, footways**, etc in a manner whereby such provision does not dominate or prejudice the overall quality of design and appearance;
- Provision is made to enable access, turning and manoeuvring for emergency vehicles and the collection of waste**; and
- Proposals for development take into account the need for crime prevention. Particular attention will be paid to such features as secure design, natural surveillance, adequate lighting and visibility. Proposals aimed at reducing crime within existing development areas will be supported provided that they are not in conflict with the objectives of other plan policies.

The District Council will also support and strongly encourage water conservation measures such as grey water systems, permeable soakaways and water efficiency devices.

Residential Amenity

- 5.58 The planning system plays an important role in safeguarding the quality of life of the residents of the district. New development of any type, if located and designed without having regard to both existing residents and future occupants, could cause serious harm to the amenities they currently, or in the case of future occupiers would be expected to, enjoy.



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Development Management Policy DM23 – Residential Amenity

When considering the impact of new development on residential amenity, the Council will have regard to the following:

- (a) privacy/overlooking;
- (b) outlook;
- (c) access to daylight and sunlight;
- (d) noise and disturbance;
- (e) the resulting physical relationship with other properties;
- (f) light spillage, air quality and other forms of pollution; and
- (g) safety and security.

Development will be acceptable where it would not cause an unacceptable loss of amenity to adjoining or future occupiers of the development.

Sustainable Construction

- 5.59 The government remains committed to taking positive action towards addressing climate change by promoting energy efficiency and minimising greenhouse gas emissions. The East of England region is particularly vulnerable to the impacts of climate change and as such it is important to proactively undertake adaptation and mitigation measures.
- 5.60 The NPPF, in particular paragraphs 93-99, sets out strong measures to address climate change as well as encouraging local planning authorities to set target contributions and promote the uptake of decentralised renewable or low-carbon energy in developments.
- 5.61 Addressing climate change is about more than reducing CO2 emissions from buildings. It is important to recognise that improvements should be made in resource efficiency such as energy, waste, water and other areas like surface water run-off problems. The Code for Sustainable Homes (CSH) is a nationally recognised standard which requires building design and construction to address these challenging issues.
- 5.62 The Government's document *Building a Greener Future: Policy Statement* (2007) is a timetable and programme for ensuring that all new homes are zero carbon for energy use by 2016. Accordingly, it is proposing increments of improved building standards be applied in legislation through the Building Regulations. What is meant by zero carbon and how it is defined remains a matter of debate at national level. Any resulting changes to the target dates will be picked up when the Core Strategy is reviewed.
- 5.63 Whilst the Council acknowledges that improvements in construction quality will be made through the revisions to Building Regulations, it is considered appropriate and urgent to require local developments to demonstrate a true commitment to sustainable development in the district as part of the planning system. With a significant part of the district delivering housing and employment as part of the Haven Gateway Growth Point status, there is a greater rationale to ensure that development is committed to minimising and mitigating adverse impacts. An Energy Opportunities Plan (EOP) has been produced in the Suffolk Coastal Renewable and Low Carbon Technology Study (2010). The EOP shows areas across the district where there is potential to deliver renewable/low carbon energy and will assist developers with considering ways to meet sustainable building standards.
- 5.64 The exceptional approach is advocated by the NPPF (paragraphs 95-96), but states that authorities must give consideration to issues of viability and use nationally accredited systems which the CSH standards are part of. Viability and appropriateness of low carbon energy technology has been tested locally through the Suffolk Coastal Renewable and Low Carbon Technology Study (April 2010). The Council is also following the ongoing national work which is tracking the costs associated with building to the CSH – the current trend for reducing general costs is noted. The evidence base has shown that in most circumstances it should be possible for developments to comply to a high sustainable build standard with minimal construction cost uplift. Major developments in particular, will have greater opportunities to incorporate high build standards due to economies of scale.
- 5.65 The Council is mindful that the local sustainable construction requirements lead to increased costs and may impact upon development viability (*Viability is defined in this context as what is practical and affordable*). On this basis and in exceptional circumstances, the Council is prepared to negotiate on required environmental building standards.

Development Management Policy DM24 – Sustainable Construction

The Council will expect all new developments, including redevelopment and refurbishment of existing buildings, to use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care in order to reduce emissions linked to changes to the climate and take into account the effects of climate change.

In order to satisfy this, residential developments should:

Meet at least the following full Code for Sustainable Homes (CSH) star levels once successive updates to Part L of the Building Regulations come into force:

- (a) in 2010 – Code level 3
- (b) in 2013 – Code level 4
- (c) in 2016 – Code level 5

Proposals for development should demonstrate an active consideration of the Suffolk Coastal Renewable & Low Carbon Technical Study and in particular, the Energy Opportunities Plan (EOP). The Site Specific Allocations and Area Action Plan Development Plan Documents will set out any further requirements necessary in these areas.

As evidence of compliance, the Council will require the submission of an interim CSH certificate(s) prior to development commencement. A final CSH certificate of compliance will be required to be submitted upon development completion. Where applicants can demonstrate, to the satisfaction of the Council, exceptional difficulties in bringing a site to market as a result of direct additional costs for sustainable standards, the Council will be prepared to consider detailed information on the viability of a particular scheme, where justified, to reduce the building standard rating requirement.

It is proposed to develop supplementary guidance to assist developers in incorporating sustainable construction within their development plans.

Art

- 5.66 'Public Art' is artwork produced by artists in a publicly accessible location regardless of whether it is situated on public or private land. Public Art can take many different forms such as a sculpture, paving pattern, lighting, seating, carving or earthwork. It can, therefore, be an integral part of the overall design providing a functional as well as an aesthetic contribution and can help create a local distinctiveness.



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Development Management Policy DM25 – Art

When considering applications for major development the District Council will seek the provision of new publicly accessible works of art.

The design and execution of public art should, wherever possible, involve the local community and a local artist, and should always involve the artist in the design process at the outset, in order to maximise the use of public art as an enhancement facility to achieve a sense of place and identity.

The District Council will require a legal agreement relating to the future maintenance of the art feature where appropriate.

Footnote: For the purposes of this policy, major development is defined as residential development of 10 or more dwellings and for other developments where the floor area to be built is 1000m² gross or more.

Development Management Policy DM26 – Lighting

The District Council will seek to minimise light pollution. Applications for development requiring or likely to require external lighting should include details of lighting schemes. This should include position, height, aiming points, lighting levels and a polar luminance diagram. Applicants will need to satisfy the District Council that:

- (a) The proposed lighting scheme is the minimum needed for security, working purposes, recreational or other use of the land;
- (b) It is designed so as to minimise pollution from glare and light spillage, particularly to residential and commercial areas, areas of nature conservation importance, and areas whose open and landscape qualities would be affected; and
- (c) There will be no glare or light spillage onto highways which could dazzle, distract or disorientate road users using them.

In order to prevent unnecessary intrusion into the countryside, or the effect on residential amenity, the District Council may seek to control the days and times of use of lighting (excluding street lighting).

Lighting

- 5.67 Artificial lighting is desirable in certain circumstances for security, pedestrians and traffic safety, recreation, and for enhancing historic and architecturally important buildings. Poor or insensitive design and installation of lighting schemes, however, can result in light pollution. This can occur as sky glow, glare and light trespass (i.e. light spillage beyond the boundary of the property on which the light is located).
- 5.68 Light pollution also represents an inefficient use of energy and a waste of natural resources, contrary to the aims of sustainable development. Proposed lighting schemes should therefore be the minimum needed for the purpose. They should result in the minimum possible pollution from glare and light spillage, and there should be no light spillage onto highways which could cause dangers. Energy efficient light bulbs should be used where possible.
- 5.69 To assist applicants, the Council intends to produce a Supplementary Planning Document on lighting. It will cover not only recreational lighting but all other uses for which external lighting is required (excluding street lighting).

BIODIVERSITY AND GEODIVERSITY

- 5.70 A significant part of the district is within internationally and nationally designated environmental sites which are centred along the river estuaries and coastal areas. By their nature such areas are particularly sensitive to development and, therefore, careful consideration should be given when assessing new proposals. Consideration should be given to the European Birds or Habitats Directives as to whether "screening" of impacts and/or an appropriate assessment is required. In accordance with national policy guidance, the strongest level of protection is given to these areas and the presumption in favour of sustainable development therefore does not apply to development proposals requiring appropriate assessment under European Birds or Habitats Directives (the NPPF paragraph 119). At the same time, it is also recognised that sometimes certain types of development could in fact improve wildlife habitats.

5.71 Sites of European importance, which include Special Areas of Conservation (SAC's) and Special Protection Areas (SPA's) are statutorily protected under the Conservation of Habitats and Species Regulations 2012 (based on EU directives), and wetlands of global importance (Ramsar sites) are protected by Government policy to apply the same level of protection as to European sites. Sites of Special Scientific Interest (SSSI's), of national importance, are protected under the Wildlife and Countryside Act 1981 (as amended). The district also contains sites of local importance including County Wildlife Sites (CWS's) designated by the Suffolk County Wildlife Sites panel, Local Nature Reserves (LNR's) designated by Local Authorities, and Regionally Important Geological Sites (RIG's) designated by GeoSuffolk. Considerable weight is given to protecting these designated sites.

Development Management Policy DM27 – Biodiversity and Geodiversity

All development proposals should:

- (a) protect the biodiversity and geodiversity value of land and buildings and minimise fragmentation of habitats;
- (b) maximise opportunities for restoration, enhancement and connection of natural habitats; and
- (c) incorporate beneficial biodiversity conservation features where appropriate.

Development proposals that would cause a direct or indirect adverse effect (alone or combined with other plans or projects) to the integrity of internationally and nationally designated environmental sites or other designated areas, priority habitats or protected/priority species will not be permitted unless:

- (i) prevention, mitigation and, where appropriate, compensation measures are provided such that net impacts are reduced to a level below which the impacts no longer outweigh the benefits of the development*; or
- (ii) with regard to internationally designated sites that the exceptional requirements of Reg. 62 of the Conservation of Habitats and Species Regulations 2010 (as amended) relating to the absence of alternative solutions and Imperative Reasons of Overriding Public Interest have been met.

Improved site management and increased public access to sites will be encouraged where appropriate.

*Footnote: *If the result of the Appropriate Assessment is that part of the Core Strategy cannot be delivered without adverse impacts on a European site which cannot be appropriately mitigated then planning permission will only be granted for a level and location of development for which it can be concluded that there will be no adverse impact on the integrity of the site even if this level is below that indicated in the Core Strategy.*

5.72 Plans or projects which may have a likely significant effect on a European site will require appropriate assessment under Reg. 61 of the Conservation of Habitats and Species Regulations 2010 (as amended). Accordingly, local authorities can only consent plans or projects where it can be ascertained that they will have no adverse effect on the integrity of a European site. In exceptional circumstances, where there are no alternative solutions, a plan or project may meet the tests of Imperative Reasons of Overriding Public Interest (IROPI), which then requires demonstration that appropriate compensation will be provided to ensure that the integrity of the Natura 2000 network is not compromised. Given the rigour of these tests, the presumption is that plans or projects that could adversely affect Natura 2000 sites will not be approved. In practice, schemes which qualify for IROPI are extremely rare and are very unlikely to fall under the Council's remit for decision making.

5.73 In order to protect nature conservation, it will also be important to protect habitats outside designated sites and to protect particular species, such as those which are rare or protected. Suffolk Biodiversity Action Plan priority species and habitats as defined by Suffolk Biodiversity Partnership, and other species protected by law will be protected from harmful development. Where there is reason to suspect the presence of nature conservation interests, applications for development should be accompanied by a survey and assessment of their value, in accordance with local biodiversity validation requirements. If present, the proposal must be sensitive to, and make provision for, their needs.

FLOOD RISK

5.74 It is important to ensure that new development is not at risk from flooding, which would endanger life and damage property. Similarly, it is important to ensure that new development does not impede flood flows, reduce flood storage capacity, or exacerbate problems of flooding in areas downstream through an increase in run-off from impermeable surfaces such as roofs and paved areas.

5.75 In order to assist in the planning of the district, particularly where allocations should be made and where new development should be located, the Council commissioned a joint Strategic Flood Risk Assessment (SFRA). This will influence the determination of planning applications on individual sites.

- 5.76 It is appreciated that development in areas at some risk of flooding is sometimes unavoidable, as many of the towns in the district are located in high risk areas. To address this, this Policy requires mitigation to ensure no net increase in the risk of flooding.

Development Management Policy DM28 – Flood Risk

Proposals for new development, or the intensification of existing development, will not be permitted in areas at high risk from flooding, i.e. Flood Zones 2 and 3, unless the applicant has satisfied the safety requirements in the Technical Guidance to the National Planning Policy Framework (and any successor). These include the 'sequential test'; where needed the 'exception test' and also a site-specific flood risk assessment that addresses the characteristics of flooding and has tested an appropriate range of flood event scenarios. Where the proposal is one for housing, the geographical area of search for alternative sites will be determined by the following principles:

(a) Affordable Housing:

Where a site is within the physical limits boundary of a Major Centre, Town, Key or Local Service Centre and there is an identified need for the affordable housing, the geographical area of search for a sequentially preferable site is the physical limits boundary. If there are no sequentially preferable sites capable of accommodating the development, then the proposal will be supported in principle subject to passing the 'exception test' set out in the Technical Guidance to the National Planning Policy Framework. Where the scheme is to be approved, it will be subject to a S106 Agreement which ensures that the affordable housing is retained as such in perpetuity.

Where a site is outside the physical limits boundary of a Town or Key Service Centre and is being promoted as an "exception site" the same principles will apply. However, the applicant will need to demonstrate that all other potential "exception sites" have been examined and there are no sequentially preferable sites available in locations abutting or well-related to the particular settlement boundary.

Affordable housing will not be permitted in areas of high risk of flooding within or outside other settlement categories.

(b) Open market housing:

Where a site is within the physical limits boundary of a Major Centre, Town, Key or Local Service Centre

and there is an identified need for the housing in order to meet the requirements as set out elsewhere in this Core Strategy or to maintain a 5 year supply of housing land, the geographical area of search for a sequentially preferable site is the housing market area**. If there are no sequentially preferable sites capable of accommodating the development, then the proposal will be supported in principle subject to passing the 'exception test'.

In the case of both affordable and open market housing, of particular relevance when applying the 'exception test' will be where significant redevelopment, or regeneration is required in order to achieve the Objectives or implement the Strategy for a particular settlement or settlement type.

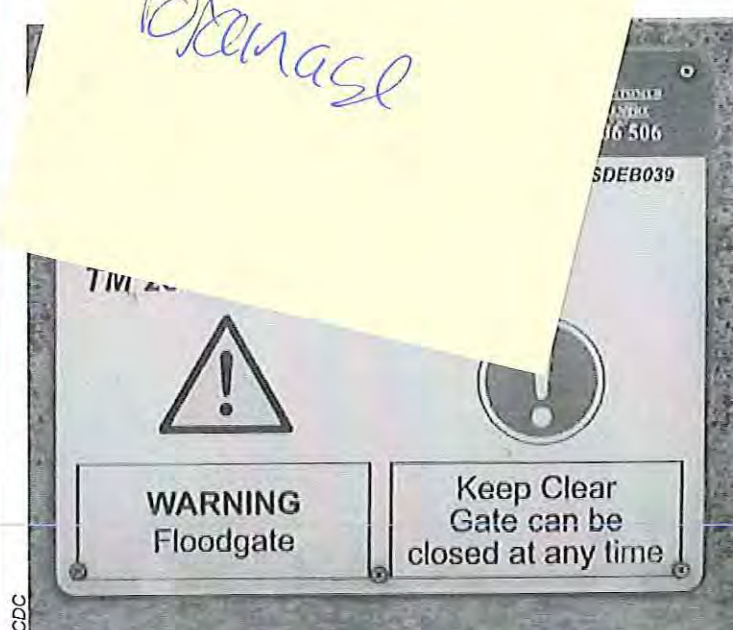
In all other areas new housing should not be permitted within Flood Zones 2 or 3.

Within all areas at high risk from flooding the proposal must be accompanied by a flood risk assessment which shows that the proposal:

- (i) Is unlikely to impede materially the flow or storage of flood water or increase the risk of flooding elsewhere – for example, due to additional water run-
- (ii) Will not result in a significant increase in the number of people or property at risk of flooding, including

For
**

*Section 6
Damage*



Development Management Policy DM31 – Public Buildings

In the event of 'public' buildings, such as schools, churches, museums or halls becoming redundant or available, planning permission for a change of use to a recreational or community use will be supported as a priority.

The change of use of a public building to an employment use will only be permitted where the District Council is satisfied that a suitable and viable community or recreational use cannot be achieved or is not appropriate.

Residential use will only be permitted in exceptional circumstances where the applicant has clearly demonstrated that there is no current and unlikely to be any future demand for the building to be used for a recreational, community or employment use or there would be a substantial planning benefit in permitting a residential use.

The form and details of the evidence submitted in support of an application for conversion to an employment or residential use, such as where and for how long a property is marketed, should be agreed with the planning authority prior to the submission of an application.

Sport and Play

5.85 Applications for new sports facilities or the improvement of existing facilities will be supported by the Council unless the development is likely to raise issues of concern. In particular, the Council will consider the likely effect of the proposed development on the surrounding area and the countryside, as well as access provision.

5.86 The economic climate and in particular the restraints on local authority spending, mean that the Council will find it increasingly difficult to continue to make good any existing shortfalls of some playing space provision, and virtually impossible to make good any future shortfalls that may result from additional development, even though the provision of adequate outdoor playing space forms an integral part of the Council's overall Health Strategy. New residential development, irrespective of size, will therefore be expected to contribute to the provision of outdoor playing space which is required as a direct result of meeting the needs of that development. In all new developments, provision should keep pace with the rate of development.

5.87 A comprehensive assessment of the existing provision for each parish has been carried out. Based on the results and then comparing them with the Fields in Trust Standard an Outdoor Playing Space Funding Scheme has been produced. The mechanism for this scheme is set out in Supplementary Planning Guidance (SPG) which will be carried forward as a Supplementary Planning Document (SPD).

5.88 Proposals which involve the loss of any existing outdoor playing space (youth and adult use), whether public, private or a school facility, should be judged against the overall needs of the community, adopted standards of provision and the availability of facilities elsewhere.

5.89 This policy recognises that playing fields and sports grounds which are situated within the towns and villages also contribute towards the character of an area and create 'pockets' of nature within large expanses of houses.



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Development Management Policy DM32 – Sport and Play

Proposals for new facilities for sport and play will be considered in relation to the character of the location, the scale of the settlement, the impact on landscape and townscape, access provision, highway safety and residential amenity.

Proposals that involve the loss of existing sports facilities and playing space (youth and adult) whether public, private or a school facility will be judged against:

- (a) the overall needs of the community;
- (b) adopted standards of provision;
- (c) the availability of comparable facilities elsewhere;
- (d) the contribution which a facility makes to the character of an area; and
- (e) its value for informal recreation.

Where the loss of the facility would result in a shortfall in provision or would exacerbate an already existing shortfall, an equivalent facility must be provided in a location agreed with the District Council and secured by a planning obligation, or other legal agreement.

Proposals for new residential development will be expected to provide or contribute towards indoor and outdoor sport and play space, including equipment and maintenance, where a local need has been identified. Contributions to off-site provision will be secured as part of the standard charges set in the Community Infrastructure Levy Charging Schedule, when adopted.



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Allotments

5.90 In 2005 the Government commissioned the University of Derby to undertake research on allotments in England. The Government recognises that allotments provide many benefits and can help improve the quality of life in communities through the provision of fresh healthy food, exercise and community interaction. They can also be valuable green spaces and the Government is seeking to ensure that they are properly protected, promoted and cared for.

5.91 To assist in the provision of allotments, the Council will have regard to Parish Plans which could provide the evidence base to determine whether there is a demand for new allotments. Where appropriate, opportunities to identify additional provision will be considered through the Area Action Plan, Site Specific Allocations or Neighbourhood Plan documents.

5.92 According to the University of Derby study the majority of allotment plot sizes across England are approximately 10m x 30m, with some made smaller (e.g. 10m by 15m) to attract smaller plot users. Proposals for new allotments should aim to provide plots of these sizes.

Development Management Policy DM33 – Allotments

The District Council will encourage the provision of new allotments in order to meet any demand that might be identified.

The Council will resist the loss of existing allotments to other uses unless suitable alternative allotments of equivalent size and quality are provided in the locality. The exceptions to this policy will be where:

- (a) there is overwhelming evidence to show that there is unlikely to be any future demand for the allotments; and
- (b) other allotments already exist and have the necessary spare capacity, and the District Council is satisfied that a recreation or community use is not appropriate.

Site Allocations and Area Specific Policies

Development Plan Document
January 2017

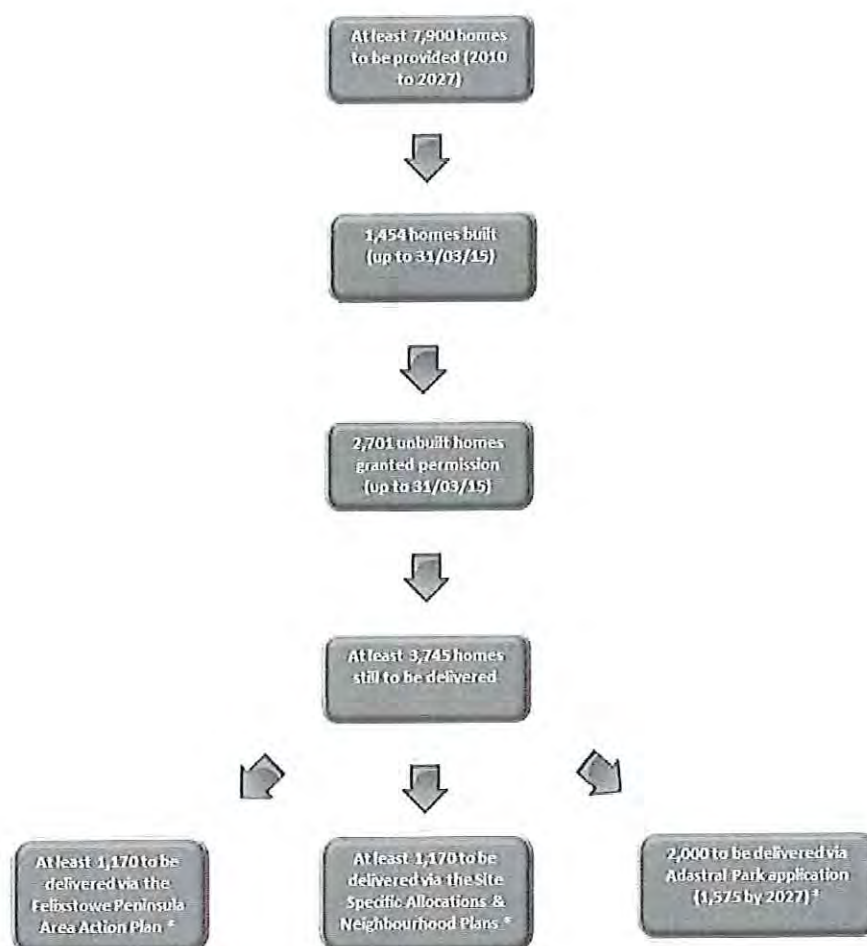


2. Housing

Core Strategy - Objective 2 – Housing Growth. Strategic Policies SP2 and SP19

- 2.01 **Core Strategy Policy SP2** Housing Numbers and Distribution, identifies a requirement for a minimum of 7,900 new homes to be provided across the District over the period 2010 – 2027. The following figure shows how many homes are still to be delivered across the District as of 1 April 2015 and the mechanism for delivering them.

Fig. 3 Housing Delivery Position as of 1 April 2015



* As the provision of housing includes minimum figures, these subtotals will not add up to the 3,745 still to be delivered

- 2.02 **Strategic policies confirm that new housing will be concentrated in those settlements identified as Major Centres down to Local Service Centre level** i.e. those which the Core Strategy identifies as the most sustainable and for which an updated physical limits

boundary is provided (see Inset Maps). It is the role of this Site Allocations Document to identify more precisely the amount of new housing appropriate for each of these many and varied settlements and allocate specific sites to deliver the growth. Further provision is made for the communities covered by the Felixstowe Peninsula Area Action Plan as well as those communities undertaking Neighbourhood Plans.

- 2.03 Collectively these documents will ensure that housing provision is spread across the district in accordance with the approach to housing distribution outlined in the Core Strategy. Table 1 outlines the Council position with regards to housing delivery and future provision as of 1st April 2015.

Table 1 Housing Provision 2010 -2027 for the District

	Contribution (dwellings with planning permission + completions) (01/04/2010 – 31/03/2015)	Allocations 1/04/2015 to 31/03/2027 (in Local Plan and Neighbourhood Plan documents plus Adastral Park)	Total to 31/3/2027
Felixstowe Peninsula AAP	1,003	1,170	2,173
Site Allocations Document (including NP and Adastral Park*)	3,152	2,745	5,897
Estimated annual windfall allowance 50 p.a (2015 – 2027)			600
DISTRICT TOTAL			8,670

*Includes the 1575 dwellings to be delivered within the plan period

- 2.04 Table 3.3 which accompanies Core Strategy Policy SP2, provides a broad distribution for the provision of housing across the district. Strategic Policy SP19 Settlement Hierarchy and supporting Tables 4.1 and 4.2 confirm where individual settlements sit within the Settlement Hierarchy. The Hierarchy itself was drawn up based on the principles of sustainable development and sustainable communities.
- 2.05 Table 2 shows the contribution that settlements have made to the minimum housing requirement from the start of the plan period as well as identifying those where new housing allocations are proposed. The Table also includes, an indication of the required housing contribution from those communities undertaking neighbourhood plans. This is necessary in order to demonstrate how the total district wide minimum housing requirement set out in the Core Strategy will be delivered.

The Approach to Housing Distribution and Site Allocations

- 2.06 The approach to housing distribution and to the housing site allocations has evolved through the plan making process. It has been arrived at through public consultation; the need to accord with the broad scale and distribution of development set out in the Core Strategy; the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).
- 2.07 The starting point was that all settlements identified down to Local Service Centre level should be considered for additional growth. The capacity for individual settlements to accommodate growth however varied considerably, even within the same level of the settlement hierarchy. Wickham Market and Rendlesham, for example, have a considerably greater capacity than Dennington even though they are all Key Service Centres. Capacity considerations included:
- Settlement size, type and character;
 - Level of provision of services and facilities;
 - Infrastructure capacity such as schools and the local road network;
 - Environmental constraints such as flooding, location in the Area of Outstanding Natural Beauty, landscape setting, proximity to Natura 2000 sites;
 - The amount of growth already committed or built since 2010;
 - The needs and aspirations of local communities; and
 - Known opportunities for development
- 2.08 Potential sites were submitted through the original 'call for sites' in 2008, and 2013, which were then assessed, alongside others identified by the Council, via the Strategic Housing Land Availability Assessment 2014 (SHLAA). Additional sites were submitted, or in some cases re-submitted, for consideration at each consultation stage. Sites with a capacity in excess of 90 homes for example were identified at Westerfield, whereas for Bramfield and Eyke no suitable sites were identified. Sites identified as theoretically suitable and deliverable for housing were then subject to sustainability appraisal and consulted upon.
- 2.09 To help inform the initial Issues and Options consultation, a range of housing figures was discussed informally with relevant towns and parishes. For the smaller settlements, a range of 5-10 units was suggested. For medium sized settlements 10 –30 units and for larger settlements 30 – 50 units with the largest potentially being able to accommodate a greater number. For the most part, these figures were considered by the towns and parishes to be "about right". Housing numbers could then come forward either via site allocations, or for smaller numbers, through small scale infill within revised physical limits boundaries. Requirements for purely affordable housing could be provided under adopted Core Strategy policy DM1 and would not require a change to the physical limits boundary.
- 2.10 At the Preferred Options consultation stage the base date for the housing figures was updated to the end of March 2015. This remains the base date for the Proposed Submission Document. These figures are reproduced in Table 2. This Table has also evolved following

the Preferred Options consultation which resulted in changes to site allocations. There have been a considerable number of planning approvals for housing since 01/04/2015 that are not reflected in the housing figures or included in policy SSP1- New Housing Delivery. Therefore, for information and clarity in defining physical limits boundaries, sites which provide for five or more units for the period 1/4/2015 to 31/12/2015 are shown on the Inset Maps (updated Policy Map on adoption of this document).

- 2.11 The final position arrived at in Table 2 has, therefore, been informed through on-going consultation and engagement, as well the views of the Site Allocations Working Group. **Consideration of the appropriate number of dwellings for individual site allocations, included factors such as site specific considerations, site context, character of the area and viability evidence.**
- 2.12 In Table 2, sites where development has yet to take place comprise those sites with a current planning permission and housing allocations. These figures may be supplemented by other "windfall" provision, which Table 1 identifies as the "windfall Allowance". "Windfall" includes developments of less than 5 units which are generally too small to allocate but in policy terms may be acceptable, being usually located within defined physical limits boundaries or in accordance with Core Strategy policies DM3 and DM4. There are also other opportunities which may occur, but are difficult to predict, throughout the plan period that deliver 5 or more units e.g. conversions of an existing building.
- 2.13 Based on the volume of housing already delivered i.e. dwellings completed between 01/04/2010 – 31/03/2015, the policies and proposals in this Site Allocations Document concentrate on those sites where development is proposed and has yet to be delivered by the end of the plan period (2027).

Table 2 Housing Contribution 2010 – 2015 & Proposed New Housing Delivery

Key to Table 2 (Definition Source - Core Strategy Table 4.1)

Major Centre	Sub-regional centre for commercial and social facilities
Market Town	Focal point for employment, shopping and community facilities. A transport hub.
Key Service Centre	Settlements which provide most or all of the following: public transport access to town; Shop(s) meeting everyday needs; Local employment opportunities; Meeting place; Post office; Pub or licensed premises; Primary School; Doctors surgery.
Local Service Centre	Settlements providing a smaller range of facilities than Key Service Centres. At least 3 from public transport access to town; Shop(s) meeting everyday needs; Local employment opportunities; Meeting place; Post office; Pub or licensed premises.
Neighbourhood Plan	Designated Neighbourhood Plan areas where the parish or town council as the "Relevant Body" are progressing a neighbourhood plan and the neighbourhood plan will, amongst other things, need to allocate land for new housing development.

Area / Parish	Contribution (by parish) 1/4/2010 – 31/3/2015			(C) New housing allocation	(D) Indicative Minimum contribution 2010 – 2027 (A+B+C)
	(A) Completions 1/4/2010 – 31/3/2015	(B) Permissions & resolution to grant permission as at 31/3/2015	Total to date (A) + (B)		
MAJOR CENTRE (East Ipswich Urban Corridor & Planning Application)					
KESGRAVE	69	6	75	-	75
PURDIS FARM	18	330	348	-	348
RUSHMERE ST ANDREW SOUTH	54	139	193	-	193
ADASTRAL PARK PLANNING APPLICATION	-	-	-	2,000	1,575 (contribution within the plan period)
MARKET TOWN					
ALDEBURGH	41	35	76	10	86
FRAMLINGHAM	106	167	273	200	473
LEISTON	34	167	201	400	601
SAXMUNDHAM	241	291	532	40	572
WOODBIDGE	46	55	101	200	301
KEY SERVICE CENTRE					
ALDERTON	14	9	23	-	23
BLYTHBURGH	6	23	29	-	29
BRAMFIELD	0	0	0	-	0
DARSHAM	3	42	45	-	45
DENNINGTON	5	4	9	10	19
EARL SOHAM	3	13	16	-	16
EYKE	2	1	3	-	3
GRUNDISBURGH	16	29	45	-	45
HOLLESLEY	44	16	60	-	60
KNODISHALL	3	14	17	-	17
MARTLESHAM	37	170	207	-	207
MELTON	25	72	97	10	107
ORFORD	2	0	2	10	12
OTLEY	0	37	37	-	37
PEASENHALL (WITH PART OF SIBTON)	7	7	14	-	14
RENDLESHAM	68	21	89	100	189
SNAPE	29	16	45	-	45
WESTLETON	11	3	14	-	14
WICKHAM	43	73	116	-	116

MARKET					
WITNESHAM	6	18	24	20	44
YOXFORD	20	15	35	-	35

LOCAL SERVICE CENTRE					
ALDRINGHAM	6	0	6	40	46
BADINGHAM	1	3	4	10	14
BAWDSEY	15	5	20	-	20
BENHALL	0	3	3	15	18
BLAXHALL	1	2	3	-	3
BRANDESTON	6	5	11	-	11
BREDFIELD	1	2	3	10	13
BRUISYARD	2	0	2	-	2
BUTLEY	0	0	0	-	0
CAMPSEA ASHE	22	10	32	-	32
CHARSFIELD	0	21	21	-	21
CHILLESFORD	3	20	23	-	23
DUNWICH	5	1	6	-	6
EASTON	2	3	5	-	5
HACHESTON	5	2	7	10	17
HASKETON	1	5	6	-	6
KELSALE	7	6	13	30	43
LITTLE BEALINGS	0	2	2	-	2
LITTLE GLEHAM	0	2	2	-	2
MARLESFORD	1	0	1	-	1
MIDDLETON	2	6	8	-	8
NACTON	18	14	32	-	32
PARHAM	0	4	4	-	4
RENDHAM	2	1	3	-	3
RUSHMERE VILLAGE	15	9	24	-	24
SHOTTISHAM	3	0	3	10	13
STRATFORD ST ANDREW	1	3	4	-	4
SUTTON HEATH	0	0	0	-	0
THEBERTON	4	3	7	-	7
THORPENESS	17	3	20	5	25
TUNSTALL	22	36	58	-	58
UFFORD	8	15	23	-	23
WALBERSWICK	9	1	10	-	10
WALDRINGFIELD	6	2	8	-	8
WENHASTON	3	28	31	-	31
WESTERFIELD	1	20	21	40	61
TOTAL	1,142	2010	3,152	2,745*	5,897

* Reflects the reduced level of housing now anticipated at Adastral Park

Source for figs: Annual housing land supply monitoring 2015

- 2.14 Table 3 provides an overview of how the proposed distribution of housing across the whole District, broadly accords with the approach set down in Core Strategy Strategic Policy SP19 – Settlement Policy i.e. the combined distribution of housing provision to be delivered through this document, the Felixstowe Peninsula AAP, Neighbourhood Plans and Adastral Park.



Table 3 Proposed District Wide Housing Distribution compared with the Core Strategy approach

Settlement Type	Proportion of Total Proposed Housing Growth (Core Strategy Policy SP19)	Proportion of growth through completions, permissions and allocations
Major Centres	51%	53%
Eastern Ipswich Plan Area	(29%)	(27%)
Felixstowe/ Walton & the Trimley villages	(22%)	(26%)
Towns	19%	25%
Key Services Centres	17%	21%
Local Service Centres		
Other Villages	Minimal	Minimal
Countryside		

- 2.15 Policy SSP1 requires that new housing delivery in the plan area should be provided in accordance with Table 2 and lists the settlements with housing allocations. There are a considerable number of planning approvals for housing that have not yet been implemented. These form an important part of the overall housing land supply in the plan area and alternative non-residential use of these sites will be resisted. A list of these sites, for 5 or more dwellings, are included in Appendix 3. They are also identified on the Inset Maps in Appendix 6 or will be identified on the main Policies Map following adoption of this document. For those communities undertaking, or looking to undertake a neighbourhood plan, they will be expected to plan for the minimum housing figure as neighbourhood plans can plan for more, but not less, development than is identified in Core Strategy Policy SP2. The delay in progressing the Adastral Park planning application, as a result of a legal challenge to the adoption of the Core Strategy, has put back the delivery of housing on this site. Now work has recommenced, it is anticipated that 1575 units will be delivered within the plan period.

Policy SSP1 – New Housing Delivery 2015 - 2027

In order to meet **at least the minimum** Core Strategy housing delivery for the plan area over the period 2010 -2027, new housing delivery should be provided in accordance with Table 2 as set out in columns (B) and (C).

Sites accounted for in Table 2 column (B) for which there is a current planning permission or a resolution to grant planning permission subject to a legal agreement, are already confirmed as being acceptable in principle for housing development and as such do not require specific allocation. These sites are nonetheless an important element in the overall housing land supply. Should the planning permission lapse, the Council will resist any application for their change to an alternative non-residential use.

Where a current planning permission, or a resolution to grant planning permission subject to a legal agreement, fall within a designated neighbourhood plan area, they will be treated as part of the minimum level of housing that the neighbourhood plan should provide for.

The BT Adastral Park planning application (current application reference C/09/0555) is expected to provide for up to 2,000 homes in accordance with Core Strategy Policy SP20 Eastern Ipswich Plan Area. Of these 1,575 are expected to be delivered within the plan period.

In addition to sites with planning permission, and to meet **at least** the Core Strategy housing requirement for the plan area, new housing provision in the form of new site specific allocations is identified at the following settlements:

SETTLEMENT	ALLOCATION
Aldeburgh	10
Aldringham	40
Badingham	10
Benhall	15
Dennington	10
Hacheston	10
Kelsale cum Carlton	30
Orford	10
Rendlesham	100
Saxmundham	40
Shottisham	10
Thorpeness	5
Westerfield	40
Witnesham	20
Total	350

Physical Limits Boundaries

- 2.16 Physical limits boundaries are applied to all settlements identified as sustainable in the Core Strategy under policy SP19 Settlement Hierarchy (Major Centres to Local Service Centres). It is to these settlements that new development is directed first and foremost (Core Strategy policy SP1). Physical limits boundaries are therefore an important policy for the supply of housing². **In order to implement Core Strategy policies SP19 and SP2 and Site Allocations and Area Specific policy SSP1, physical limits boundaries have been re-drafted to incorporate sites of 5 or more units where the principle of housing has been accepted and new housing allocations.** These sites and the revised physical limits boundaries are shown on the Inset Maps.
- 2.17 The physical limits boundaries have operated as a policy guide to development over many years and have now been updated to ensure they are fit for purpose for the plan period and beyond, and are logical and defensible.
- 2.18 Physical limits boundaries are a policy line on a map which is used to define the main built area(s) of a settlement including any scope for growth over the plan period (to 2027). They should not be read as necessarily defining the full extent of a settlement as may be perceived by the local community. For example an open space on the edge of a settlement or small clusters of houses may have been excluded.
- 2.19 **Inside the physical limits boundary there is a policy presumption that development is acceptable in principle.** However, any proposal would still need to be acceptable in all other regards for planning permission to be granted (e.g. residential amenity – Core Strategy policy DM 23).
- 2.20 Outside the physical limits boundary, opportunities for housing development are considerably more limited as countryside policies of restraint will apply (Core Strategy policies SP28 and SP29). More limited opportunities for housing in the countryside do however exist through Core Strategy policies DM1, DM3, DM4, DM6 and DM9.

² This reflects the current state of the law following the Court of Appeal decision in March 2016 in respect of Suffolk Coastal DC v Hopkins Homes Ltd which is currently the subject of an appeal to the Supreme Court to be heard 22nd /23rd February 2017.



- 2.21 When updating the physical limits boundaries, a consistent approach has been taken to how and where those boundary lines are drawn across the district. Where possible the boundaries follow physical features on the ground reflecting visual breaks between built form and more open countryside or other open space. They also include more recent housing developments, however, an element of discretion has been applied where this better reflects the views of that individual community. The revised physical limits boundaries are shown on the accompanying Inset Maps. The following policy will apply:

Policy SSP2 – Physical Limits Boundaries

In accordance with Core Strategy policy SP19 Settlement Hierarchy, physical limits boundaries have been drawn for all settlements listed as Major Centre, Town, Key and Local Service Centre. These are settlements which the Core Strategy has defined as sustainable. The physical limits boundaries identify the parts of those settlements to which new development, particularly new housing development is directed. Accordingly, in principle, proposals for development within the defined physical limits boundary will be acceptable, subject to other relevant policies in this Site Allocations Document, the Core Strategy and Neighbourhood Plans.

Proposals for new residential development outside physical limits boundaries will be strictly controlled in accordance with national planning policy guidance and the strategy for the countryside as set out in Core Strategy policy SP29.

Housing Allocations

- 2.22 The Site Allocations Document provides a range of housing opportunities across a variety of sites to meet the requirement for housing as outlined in the Core Strategy. Residential proposals have been considered in accordance with the principles of Sustainable Development as outlined in the NPPF.

- An archaeological investigation will be required;
- Developers will need to demonstrate there is adequate capacity in the foul sewerage network and WRC (Gedgrave) or that capacity can be made available; and
- Surface water disposal must be in accordance with the water management hierarchy.

RENDLESHAM

(NEIGHBOURHOOD PLAN - See RNP objectives housing 3 – 3f)



- 2.91 Rendlesham is unique in many ways. It is a Key Service Centre which is altogether larger, and contains a much wider variety of facilities than is common to most Key Service Centres given its historic legacy as a former US Airforce base. It also has a “made” Neighbourhood Plan, containing policies relating to the promotion of the village centre to continue to develop to meet the needs of existing and future residents, and the provision of allotments.
- 2.92 The village contains the one remaining housing allocation from the former Suffolk Coastal Local Plan 2001 which has now been re-assessed alongside other sites and re-allocated for residential development.
- 2.93 The Neighbourhood Plan builds on the work of the earlier masterplan for Rendlesham and “saved” policies AP159; AP160 and AP161 and seeks to ensure that the village continues to develop and function to meet the needs of new and established residents and businesses, concentrating on the provision of services and facilities required to meet the needs of the new and growing population. Across the main road from the main residential area, is a large employment site containing a mix of uses (the former technical base). A comprehensive

development plan for the whole employment site has recently been granted planning permission (see employment section – Bentwaters Park (policy SSP24)).

- 2.94 Whilst the Neighbourhood Plan does not allocate land for housing, Chapter 10 of the plan includes a number of objectives (3 – 3f) in relation to new housing e.g. to density and streetscene. In addition, Policy RNPP3 requires that new residential or mixed use development makes provision towards the identified local need for allotments, orchards and growing spaces.
- 2.95 The village 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. There is a need to maintain a clear overview of the cumulative impact of individual developments on the local road network from Rendlesham through to Melton and the A12. The internal road layout within the village (a consequence of its original function as an airbase) means access from the village to the external road network is limited. There are also few opportunities to access the adjacent countryside due to lack of public footpaths and the presence of a perimeter fence, again a legacy of its former use as an airbase. The provision of a new footpath/bridleway is a condition of the recent planning permission for the employment site providing residents with more direct access to Rendlesham / Tunstall Forest.
- 2.96 Two sites are allocated for large scale housing schemes which together can provide approximately 100 homes. Both sites provide the opportunity for additional community benefit as envisaged in the Neighbourhood Plan.
- 2.97 Development proposals for both allocations will need to investigate the cumulative traffic impact on air quality at Melton crossroads and the Air Quality Management Area declared in Woodbridge. An Air Quality Assessment, together with a mitigation appraisal, will be required.



SSP12 - Land west of Garden Square, RENDLESHAM

Site area: 5.05 ha

- 2.98 This site is the northern of the two sites identified on the plan above. The site was formerly allocated for housing development for approximately 75 units. The main limiting factors in respect of this site are its proximity to the Water Re-cycling Centre (sewage treatment works) which requires the provision of a "cordon sanitaire", and the sewers that cross the site. The minimum distance for the cordon sanitaire will be a matter for discussion with Anglian Water as will any layout issues linked to the alignment of the sewers. The number of homes and the area on which development could take place has therefore been reduced to approximately 50. Anglian Water have also confirmed that there is likely to be a need for improvements to the foul sewerage network. Land not suitable for building does however have the potential to provide for a mix of informal open space and allotment provision in accordance with Rendlesham Neighbourhood Plan objective 4, Allotments, Orchards and Growing Places and Neighbourhood Plan Policy RNPP3. Informal open space will provide space for daily dog walking and complement existing more formal green space provision nearby, as an alternative to the more sensitive Rendlesham and Tunstall Forests.
- 2.99 The design and layout of the scheme will be expected to have due regard to the housing and transport objectives set out in the "made" Rendlesham Neighbourhood Plan. Suffolk County Council Archaeology have also confirmed that the site lies within the former extent of Rendlesham Hall and within the broader landscape, where there is evidence of significant multiperiod archaeological remains. An archaeological assessment at an appropriate stage

in the design of the development will be required to allow for in-situ preservation as necessary.

Policy SSP12 – Land west of Garden Square Rendlesham

5.05ha of land west of Garden Square, Rendlesham, as shown on the Policies Map, is identified for a mixed residential development and greenspace provision for approximately 50 units.

Development will be expected to accord with the following criteria:

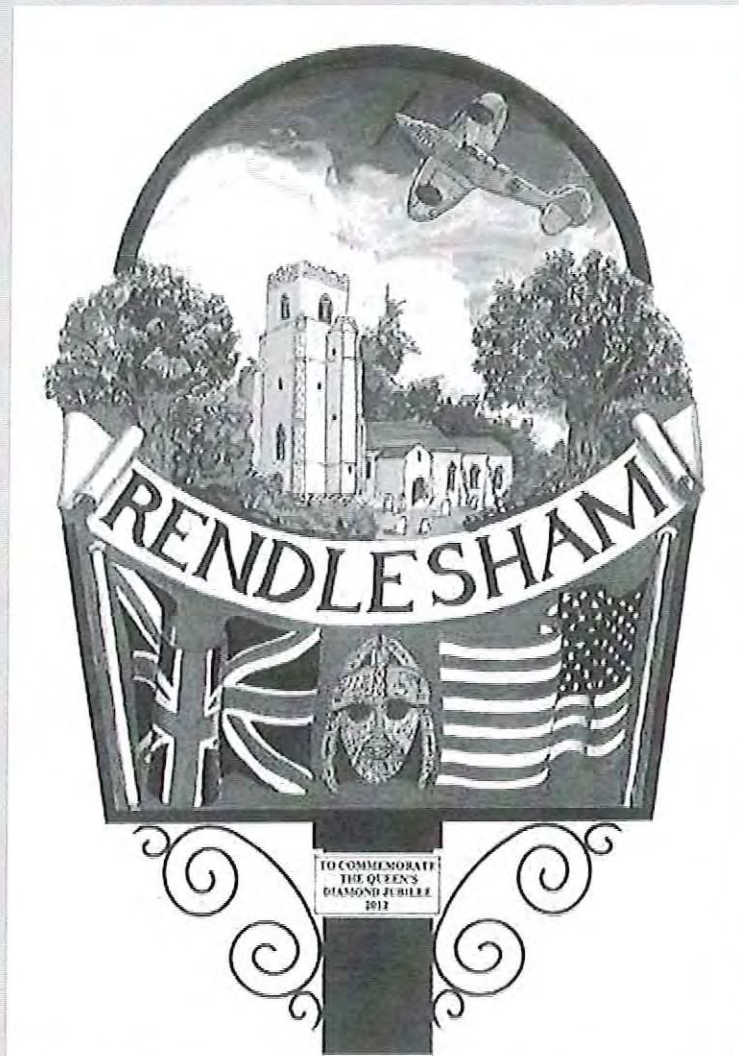
- Meet the minimum distance from the Water Recycling Centre within which new residential development is considered acceptable as advised by Anglian Water;
- Provision of a flood risk assessment;
- Accommodate the sewers that cross the site;
- The development will need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available;
- The design, layout, mix and type of housing proposed is compatible with the housing and transport objectives set out in the 'made' Rendlesham Neighbourhood Plan;
- Provision of affordable housing;
- The remaining greenspace should be used for a mix of informal open space suitable for daily dog walking, allotments or orchards in accordance with Rendlesham Neighbourhood Plan policy RNPP3;
- Provision of a substantial landscape buffer to the northern and western boundaries where it abuts open countryside;
- An archaeological assessment will be required; and
- A transport assessment.

In addition, the air quality impacts of traffic from cumulative development at Melton crossroads and the Air Quality Management Area declared in Woodbridge will need to be investigated in the form of an Air Quality Assessment, together with a mitigation appraisal.

SSP13 – Land east of Redwald Road, RENDLESHAM

Site area: 4.3 ha

- 2.100 Approximately 4.3 ha of land to the east of Redwald Road is identified for residential development for approximately 50 units with access off Redwald Road. The site is contained within established defensible boundaries of established woodland with more extensive plantation to the north and east of the site. Woodbridge and Redwald Roads act as the boundaries to the south and west. The site frontage along Redwald Road is bounded by a water course and this will need to be accommodated within the design.



Rendlesham Neighbourhood Plan

Rendlesham Parish Council

2014 - 2027

(January 2015)

Objective 3

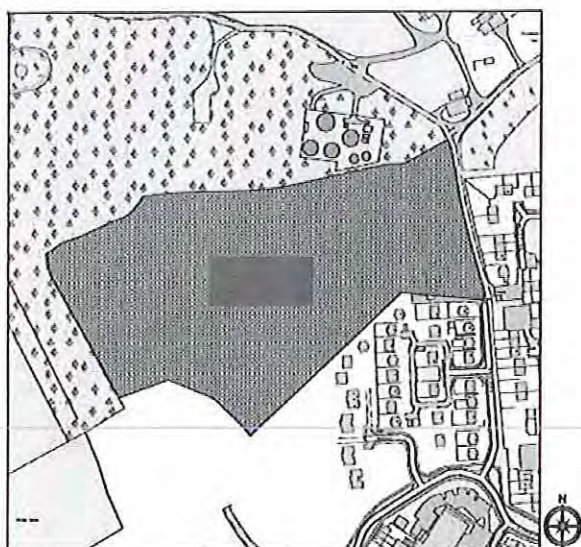
To ensure that adequate land for housing is provided for sustainable growth to meet the needs of future generations and enable the provision of affordable housing.

The RNP would look for the principles contained within it to be included as part of any development brief for the outstanding allocation and any sites that are taken forward.

Housing Growth

10.01 There are existing determining factors that identify Rendlesham as an area for further growth. An existing allocation in the SCLP (Fig 35), allocation as a Key Service Centre, designation as a District Centre; both

Fig 35 - Outstanding allocation: land to the west of Garden Square



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contained within the SCCS. Whilst the draft RNP initially sought to take this, and other sites forward, it has been identified through the Regulation 14 Pre-Submission consultation that, in order to work with SCDC in their 5-year housing land supply, and SCC with their areas of responsibilities, the key tool for taking forward sites for development will be the SCLP. The objectives and information within the RNP will guide SCDC, SCC and developers on housing density, land use, design and the infrastructure required to support the increase in population by reflecting the aspirations of the residents of Rendlesham. Having a Plan that looks at the future of the parish as a whole will ensure that the quality of life for those who live and work here will be not only maintained but improved to address the shortfalls that currently exist.

10.02 RPC, through the RNP, will work with SCDC on the outstanding site allocation. Under existing policy DM1, one third of the housing is expected to be 'affordable housing'.

10.03 The RNP is not a tool to say no to housing, it is a tool to ensure that future housing growth is sustainable and has the infrastructure to support a growing community as reflected in Objective 1 of this NP.

- 10.04 One of the purposes of the household questionnaire was to identify suitable sites for future housing and community facilities. Areas extracted from the SCDC SHLAA Report 2012 were put to residents for their comments. This information will now feed into the Suffolk Coastal SHLAA.
- 10.05 The feedback was conclusive. All the sites put forward in the Pre-Submission document received support of varying levels, however, it was felt, **with the exception of the existing site allocation (Fig 35—page 64)** that the sites should be of mixed use, low housing density, with larger sites incorporating green spaces, landscaping and have provision for community uses such as woodland, recreation and allotments.
- 10.06 Because of the evidence of settlement in the parish extending back to late prehistoric times and extensive settlement in Roman and Anglo Saxon times, requirements will need to be placed upon individual developments at the planning application stage to ensure that detailed evidence is collected and excavation is carried out as required as set out in chapter 11 of the NPPF.
- 10.07 *'Good design is not just about how the development looks but also how it works.'* (SCCS, 2013). The RNP will create the basis for good design, layout and landscaping to provide the best possible quality of life for those who will live there and those who live adjacent to the sites, to minimise the impact of any new housing coming forward in the SCLP.
- 10.08 Housing should be guided by the principles identified in this NP and have regard to DM22 of the SCCS. Schemes that encourage first time buyers and 'accessible' homes, also called 'Lifetime Homes' will be encouraged to enable Rendlesham to retain a diverse and healthy community.
- 10.09 Consultations with the current residents of Rendlesham have shown that there is a proven need for community, retail, education and leisure infrastructure or the **provision of land in the District Centre for these to be provided using CIL contributions.** The infrastructure to support the existing village, as well as any future growth, is seen as key to any future housing growth.
- 10.10 **In conclusion, the potential for Rendlesham to encompass housing growth exists.** However, the objectives and policies contained within the RNP are intrinsically linked and are fundamental to the future determination of number of houses permitted.
- 10.07 *'Good design is not just about how the development looks but also how it works.'* (SCCS, 2013). The RNP will create the basis for good design, layout and landscaping

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.

Whilst new housing has introduced larger properties into the village, new housing should have regard to the sustainable mix of housing as identified in Appendix N.

10.11 From the responses received (Fig 36) it becomes clear that the majority would like to see small family homes built for people with a local connection. Following on from this, there is a desire to see homes for couples, the elderly, people with disabilities young people and single people. The category with the least support (with the

exception of the category of 'other) is 'large family homes' (4+ beds).

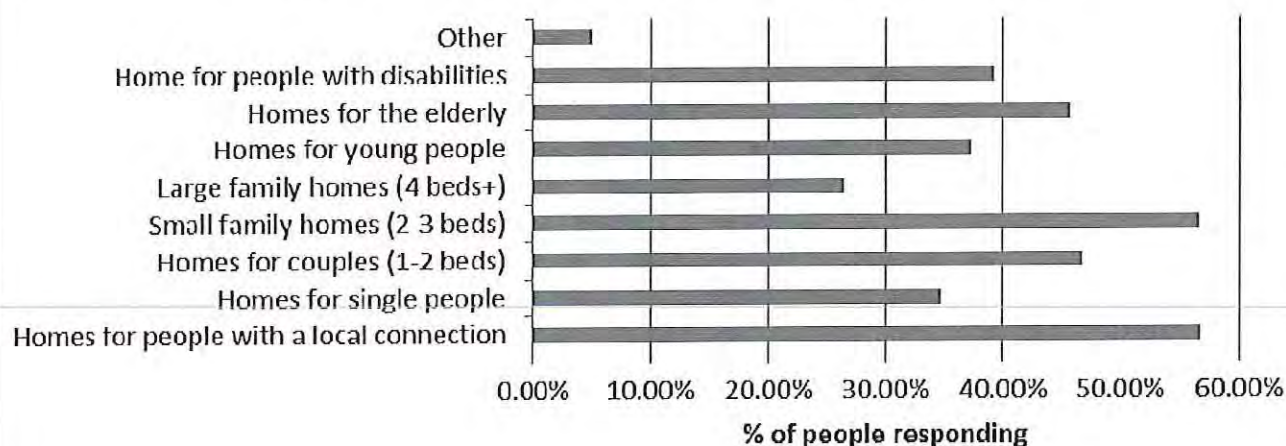
10.12 The type of housing people feel is needed is generally a mixed housing scheme but with emphasis on semi-detached dwellings and bungalows. Also identified is the desire for affordable housing (through a housing association) and sheltered housing with less emphasis on flats/apartments, maisonettes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

10.13 When linked with the graph that identifies who housing should be built for, the outstanding preferences are for:

- 1-3 bed homes in a mixture of semi-detached, bungalows and detached housing
- Affordable housing (provided through a housing association) – this can include homes for couples, families, first time buyers (through shared equity schemes)

Fig 36

Who should new housing be built for?



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.

as well as the elderly. A mixed housing of 1-3 bed homes also meets the need for the provision of homes for local people (56.76%), as affordable housing schemes provide housing for local people in perpetuity.

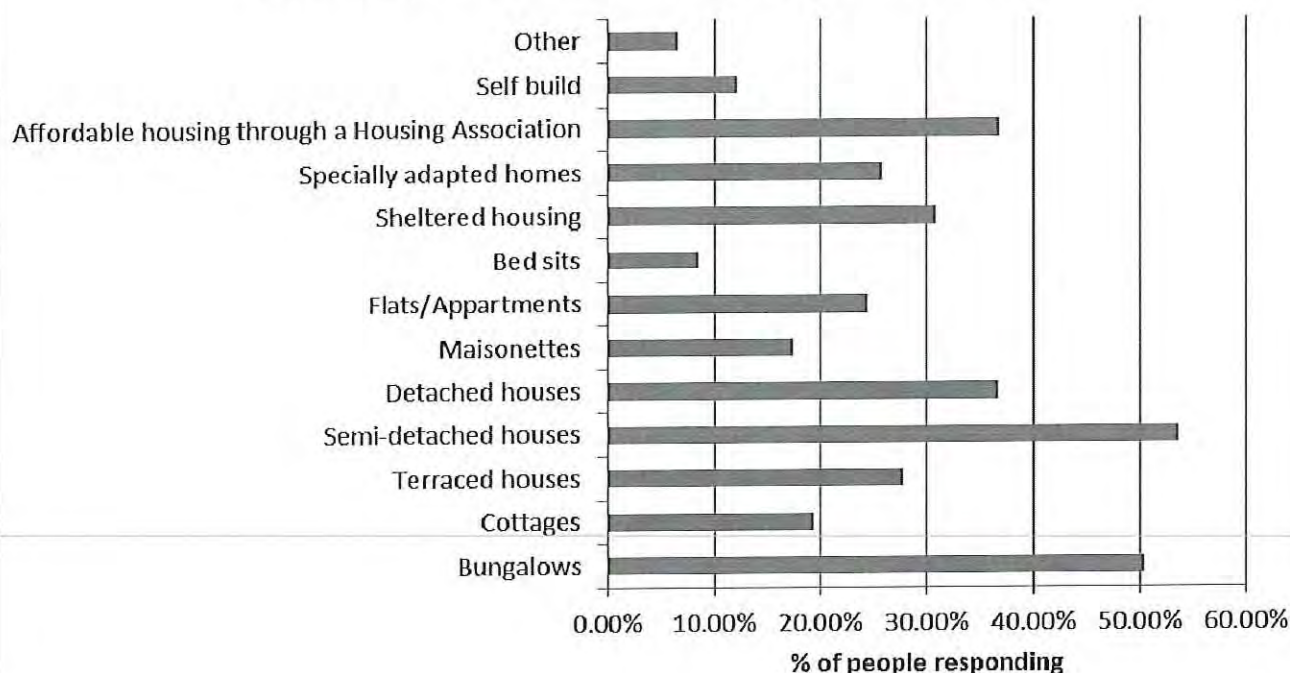
- Generally the people who live in Rendlesham want to stay in Rendlesham. The provision of sheltered housing for the elderly population and people with disabilities has been highlighted.

Housing Design

10.14 Rendlesham has a wide mix of housing which has evolved over the years, partially as a legacy from the MOD era and more recently as 65% new housing growth over the past 10 years. This has resulted in a variety of housing types and housing design layouts. With this in mind, residents have identified the 'best' practice for Rendlesham culminating in the Rendlesham Top 9 Design Principles (Fig 38—page 68).

Fig 37

What type of new housing is needed?



10.15 Housing density should be commensurate with the objectives in the RNP to ensure well designed schemes that provide open green space, amenity land and meeting space within the street layout. (Appendices A and O).

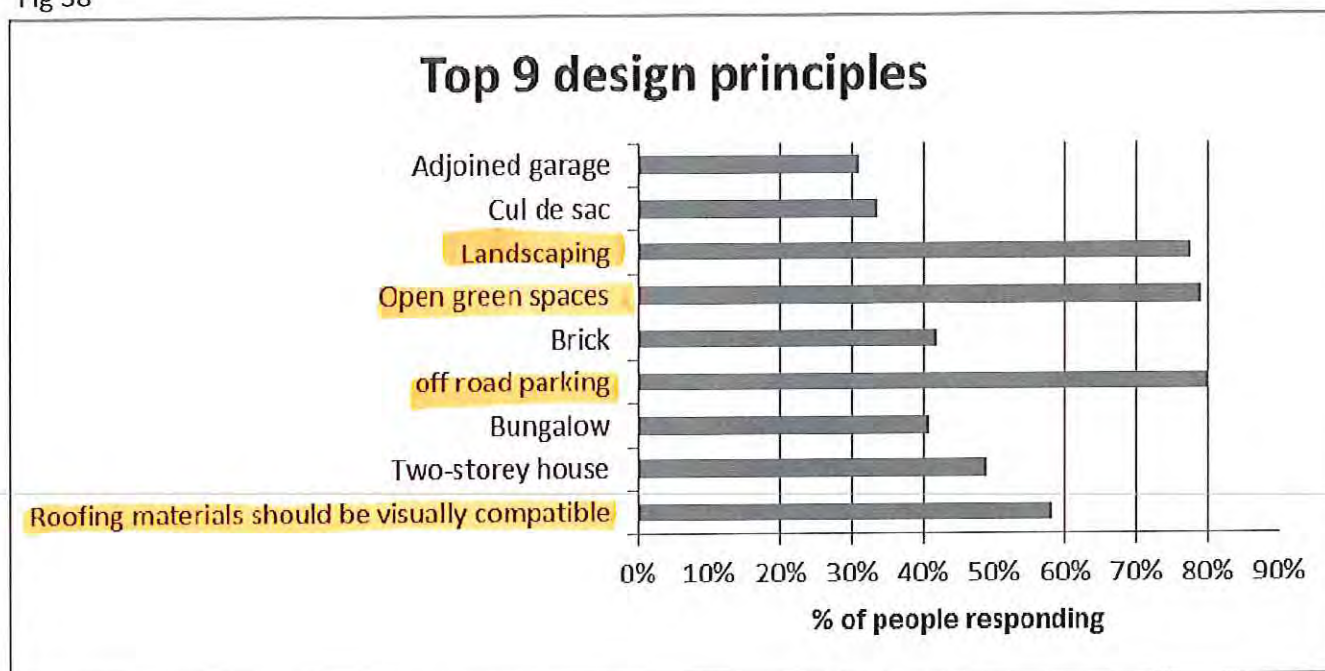
10.16 One of the problems identified is on-road parking, particularly where vehicles park half on/half off the road. This causes road crossing hazards and obstruction to pedestrians, pushchairs and anyone with mobility issues as well as giving the street scene a very cluttered appearance. To prevent 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.

10.17 SCC currently considers parking provision through adopted Parking Standards (Suffolk Advisory Parking Standards- 'SAPS'). These standards are due to be withdrawn in the near future, to be replaced with new guidance. The SAPS, allied to the NPPF (paragraph 39), will be the guide by which parking proposals will be judged, and the mechanism by which this Plan's policies on parking will be implemented. The SAPS will be based on best practice and data on car ownership levels.

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.

10.19 Street scenes play an important part in any housing development and the following have

Fig 38



Objective 3c – Street Scene

The street scene is an important part of the aesthetics of any housing development and development should be guided by the design principles in this NP.

Inadequate parking can lead to overcrowded street scenes and inconsiderate parking on pavements, causing obstruction to pedestrians and cyclists. The guidance provided in this NP should be used to ensure provision of on-street landscaped parking bays as well as off-road parking for residents.

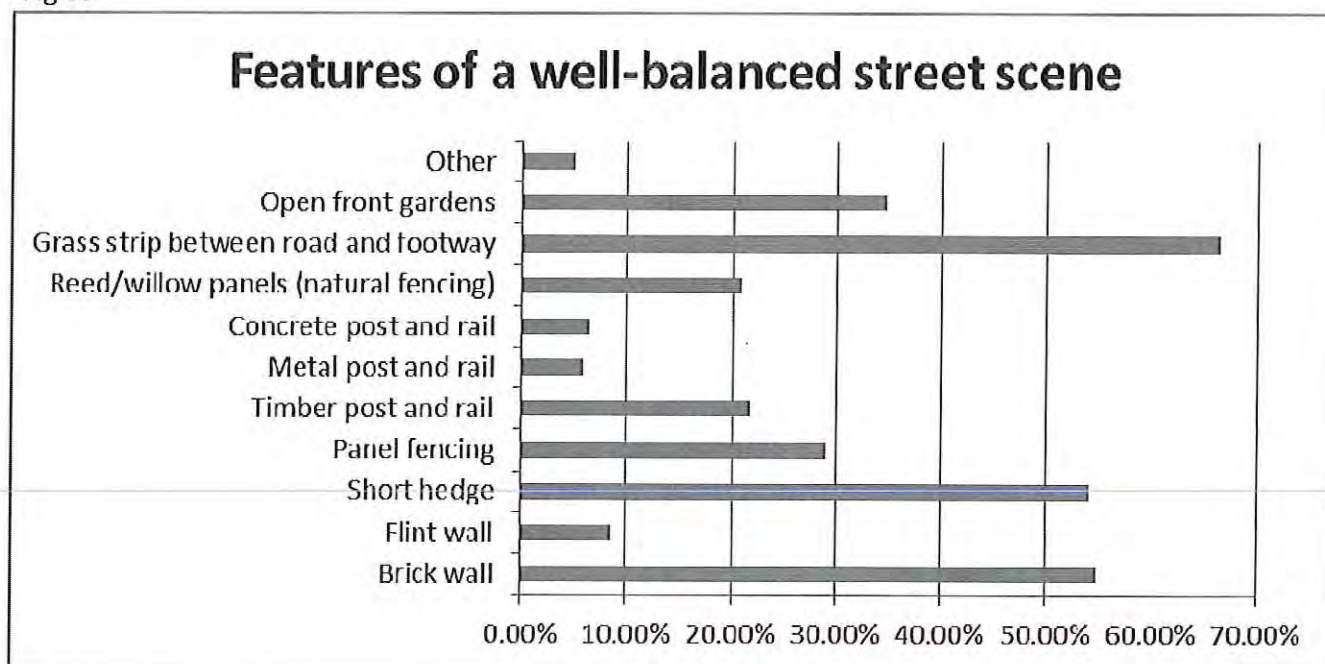
been identified as being key features in creating a well-balanced street scene.

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

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.

Fig 39



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.

Objective 3d – Sustainable Transport

Sustainable transport is an important aim and off road provision should be made on artery roads in developments to promote the use of cycling and shared space schemes within the village. Good examples of this can be found in Rendlesham and these principles should be followed when designing new housing schemes.



Knight Road

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.

10.23 The less tangible infrastructure is an important part of provision of services eg being able to get an appointment with the doctor without having to travel to Wickham Market, access to faster broadband, having sufficient capacity in the sewage system, being able to access a dentist or family services. Any increase in the population

through new housing development will put pressure on existing services. Service providers need to ensure that provision is commensurate with the growing population.

10.24 New buildings should be well designed and incorporate features that promote renewable energy, and minimise energy and water use.



Pedestrian/cycle path, Acer Road

Objective 3f—Rural Affordable Housing

To ensure that local homes are built for local people so that people who live and work in Rendlesham can afford to stay in the village when personal circumstances change eg the sale of a rented property, leaving home, downsizing for older people or finding more suitable accommodation because of disability.

10.25 SCDC recognise within their Local Plan Core Strategy that *'lack of affordable housing provision within the district is a major problem.'* This is reflected in Rendlesham and the need for affordable housing is evidenced in Appendix D.

10.26 SCCS policies relating to Rural Local Housing (Affordable Housing) can be found in Appendix E.

10.27 There are currently two ways in which Rural Local Housing can be provided, either through a local scheme facilitated by the Parish Council or through SCDC's housing policy DM2 which states that in considering planning applications for the development of *'3 or more additional housing units in Key Service Centres..... the District Council will expect 1 in 3 units to be affordable housing'*.

10.28 For Rendlesham, Local Rural Housing is expected to be provided through SCDC's DM2, however, the potential for a village scheme, where the parish will have more influence on design, layout and choice of housing association could be taken forward under SCCS DM1 where an agreement is reached with a developer or landowner.



Rendlesham Care Centre

Objective 4—Allotments, Orchards and Growing Places

To promote the health and wellbeing of the people who live and work in Rendlesham, the provision of spaces within the village will be provided to make opportunities to promote a healthy and sustainable way of living.

The RNP has identified a deficit of allotments therefore contributions will be sought where land is not available on site.

11.01 *'In 2005 the Government commissioned the University of Derby to undertake research on allotments in England. The Government recognises that allotments provide many benefits and can help improve the quality of life in communities through the provision of fresh, healthy food, exercise and community interaction.'* (SCDC Local Plan Core Strategy, 2013).

11.02 The RNP recognises that there is a strong desire amongst residents to have access to places where they can grow food, whilst gaining the benefits of exercise and social interaction. Rendlesham currently has no allotment provision, however, within the current restrictions of usable space the community group 'Grow Me Rendlesham' have created partnerships with the Acer

RNPP3

New residential or mixed use development is required to make provision towards meeting identified local need for allotments, orchards and growing spaces.

RPC: Edible beds at Acer Road Pharmacy



Road Pharmacy to transform redundant planting beds into 'edible beds' and with St Felix Church to provide raised beds in the Church garden.

11.03 184 people have expressed an interest in having an allotment in Rendlesham (RNP Household Survey, March 2013). It is recognised that allotments do not have to be consolidated in one location but could be provided in several locations, enabling better access to residents in all parts of the village. In response to this, the RNP supports provision on new housing sites or on a stand alone site.

11.04 The use of small community spaces for communal growing, such as the Grow Me

Rendlesham project, has proved an innovative way for people to get involved but without the commitment of an allotment.

11.05 The RNP also recognises that allotments and community spaces can accommodate more than traditional vegetable growing and therefore the diversity of food production could be expanded to include community orchards and nutteries.

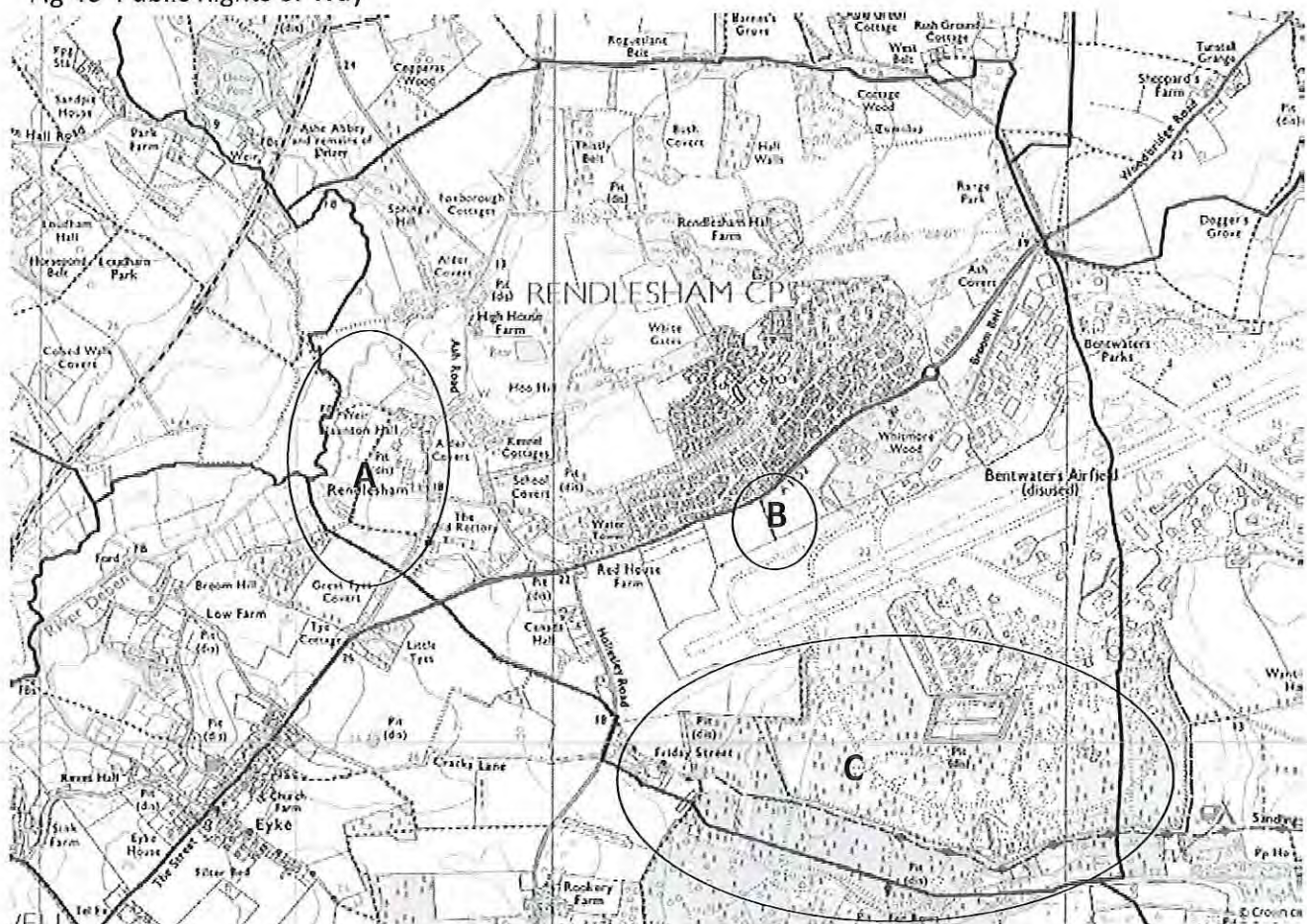
11.06 Small growing schemes in community space and green pockets of land in amongst residential development will be supported to encourage people to get involved whilst promoting a healthy lifestyle.

Rights of Way

11.07 Due to its former use as an USAF base, Rendlesham has a very limited number of public Rights of Way (Fig 40).

11.08 A forthcoming addition to the network is contained within the Bentwaters' Master Plan which will provide a bridleway status route linking B and C in the Neighbourhood area. Given the proximity to Rendlesham Forest this will provide a more direct route to large areas for recreation and the promoted long distance trail (the Sandlings Walk) with links to further countryside destinations.

Fig 40 Public Rights of Way



Full Development Plan Policy Analysis

Strategic Policy SP1 Sustainable Development

- A.1 Policy SP1 sets a number of ways in which the local planning authority will pursue its strategy of sustainable development including some relevant to this planning application:
- *To relate new housing development to the settlement hierarchy*
 - *Achieve a balance between employment opportunities, housing growth and environmental capacity*
 - *Ensure the provision of the appropriate infrastructure in order to support existing and proposed communities*
 - *Promote sustainable construction*
 - *Maintain and enhance a sense of place*
- A.2 This planning application supports the criteria listed above. The site is located in a key service centre which is a sustainable settlement in the settlement hierarchy. Being located in Rendlesham the proposed housing on this site will find a balance between employment opportunities (local employment sites in the village and the large general employment area of Bentwaters Park adjacent) and environmental capacity (Rendlesham is sufficiently distant from areas of high environmental sensitivity such that it was the capacity of large scale housing development. Community infrastructure levy monies arising from this development will be the mechanism through which appropriate off-site infrastructure will be provided to support the community. Sustainable construction is at the heart of this proposed development which, by building on previous successful housing development, will maintain and enhance the sense of place.
- A.3 No conflicts with other SP1 criteria exist. This proposal is compliant with the requirements of policy SP1.

Strategic Policy SP1a Presumption in Favour of Sustainable Development

- A.4 Policy SP1a states that “where [...] policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate

otherwise taking into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits or specific policies in the Framework indicate that development should be restricted”.

- A.5 The local planning authority accept that the NPPF paragraph 14 ‘presumption in favour of sustainable development applies’ and this planning statement sets out how the balance of benefits versus impacts is clearly in favour of granting planning permission.

Strategic Policy SP2 Housing Numbers and Distribution

- A.6 Policy SP2 is considered by the local planning authority to be out of date and therefore it carries less weight in decision making.
- A.7 Policy SP2 sets the overall housing numbers and their distribution across the district upon which, so far, all other housing policies in the development plan are predicated. Therefore the housing figures in the development, such as those relating to this site, should not be regarded as limiting factors in of themselves but rather re-considered in light of the Presumption in Favour of Sustainable Development and the prerogative to boost housing supply significantly.
- A.8 Nonetheless the site is located inside of the settlement boundary for Rendlesham which is categorised as a key service centre because of the range of services and facilities it offers and as such this proposed development conforms to the aims of policy SP2.

Strategic Policy SP3 New Homes

- A.9 Policy SP3 states that the Council’s strategy will be to “increase the stock of housing to provide for the full range of size, type and tenure of accommodation” and that “such provision is to be made in a manner that addresses both the immediate needs of the resident population and the longer term future needs of the population, in accordance with the principles of sustainable development and sustainable communities”.
- A.10 Granting planning permission to this proposed development would contribute to increasing the district’s housing stock in a sustainable location. The nature of the proposed scheme would contribute to the range of accommodation in compliance with this policy.

Strategic Policy SP11 Accessibility

- A.11 Policy SP11 requires that opportunities for local journeys be maximised in new development. It states that “in relation to foot and cycle provision this will mean securing safe and easy access to local facilities where walking or cycling offers a realistic alternative for most people.
- A.12 In compliance with this policy the proposed design provides for pedestrian and cycle links to the village and on to the district centre in particular. This is a key aim of the Rendlesham Neighbourhood Plan and were raised in pre-application consultation with the Parish Council as a key issue.

Strategic Policy SP12 Climate Change

- A.13 Policy SP12 states that the district council will contribute towards mitigating climate change by “ensuring development minimises the use of natural resources by utilising recycled materials where appropriate, minimises greenhouse gas emissions, incorporates energy efficiency, encourages the use of public transport, helps to reduce waste and minimises the risk of pollution”.
- A.14 Environmental sustainability is at the heart of the applicant’s rationale for the development where sustainable materials and build techniques are core to the approach in conformity with this policy.

Strategic Policy SP14 Biodiversity

- A.15 Policy SP14 states that biodiversity will be protected.
- A.16 This planning application is accompanied by an ecological appraisal which meets the requirement of this policy.

Strategic Policy SP15 Landscape and Townscape

- A.17 Policy SP15 states that the policy of the Council will be to protect and enhance the various landscape character areas within the district.
- A.18 This site is located adjacent to the existing built form of the village and is enclosed to the north and west by dense and established woodland:



- A.19 Site specific policy SSP12 also requires the proposed layout to incorporate a substantial landscaping belt on the northern and western boundaries which has been provided.
- A.20 This proposal will not adversely impact landscape character in compliance with this policy.

Strategic Policy SP16 Sport and Play and Strategic Policy SP17 Green Space

- A.21 Policy SP16 requires that “the appropriate provision, protection and enhancement of formal and informal sport and recreation facilities for all sections of the community will be supported, particularly where shortfalls in local provision can be addressed and it accords with local requirements”.
- A.22 Policy SP17 states that “The Council will seek to ensure that communities have well-managed access to green space within settlements [...], in order to benefit health, community cohesion and greater understanding of the environment, without detriment to wildlife and landscape character. Where adequate green space is not provided as part of a development, developer contributions will be sought to fund the creation of appropriate green space and/ or management and improvement of access to green space [...] Developer

contributions will be secured by means of conditions, legal agreements and/or through the Community Infrastructure Levy (CIL)”.

- A.23 This application proposes large areas of exceptionally high quality informal and formal recreational public open space. Community infrastructure levy monies will, if relevant, provide for off-site shortfalls in sport and play provision in compliance with this policy.

Strategic Policy SP18 Infrastructure

- A.24 Infrastructure, or the perceived lack of it, is a key issue for the community in Rendlesham. The neighbourhood plan makes clear the history of infrastructure failing to keep pace with development and the loss of significant infrastructure when the USAF airbase shut and new housing was built.
- A.25 Policy SP18 states that “CIL will become the primary means of securing off-site contributions. In respect of specific proposals such as housing allocations, the necessary infrastructure will be identified and costs estimated in order that its provision can be tied into and phased with the development itself”.
- A.26 At the recent public consultation event a recurrent query was to know the approximate level of CIL monies that the development would raise and the proportion that would come to Rendlesham. Using the Suffolk Coastal CIL calculator (see Appendix 4) we estimate that the CIL money that will be raised from this development will be in the region of £700,000.
- A.27 Because Rendlesham has a ‘Made’ neighbourhood plan 25% of this (approx. £175,000) will be available for expenditure directly in Rendlesham on local infrastructure projects.

Strategic Policy SP19 Settlement Policy

- A.28 Policy SP19 categorises Rendlesham as a key service centre because it provides “an extensive range of specified facilities” including “public transport, shop(s), local employment, meeting place, post office, pub or licensed premises, primary school or doctors’ surgery”.
- A.29 It goes on to state that “within the defined physical limits of key service centres modest estate scale development will be appropriate where consistent with scale and character of the settlement”.
- A.30 Rendlesham is a key service centre and according to policy PS19 is a sustainable settlement.

Strategic Policy SP27 Key Service Centres

- A.31 Policy SP27 states that the [Council's] strategy will be to "permit housing development within defined physical limits".
- A.32 The application site is wholly within the settlement boundary for Rendlesham and is allocated for housing in compliance with this policy.

Development Management Policy DM2 Affordable Housing on Residential Sites

- A.33 The supporting text to Policy DM2 states that "the Council commissioned a Local Housing Assessment, completed in July 2006, which identified the affordable housing need of the district as 24% of all new homes. Policies SP1, SP19, DM1 and DM2 provide the framework within which to provide the estimated 1,896 affordable homes required over the period 2010 to 2027".
- A.34 It is important to bear in mind that the housing figures above are uncertain because of the
- A.35 Policy DM2 applies a strategy of seeking 33% affordable housing on sites of three or more units in Key Service Centres "unless its provision is not required due to [...] economics of provision" in order to achieve the identified need of 24% of all new housing as described in the policy supporting text.
- A.36 This planning application is proposing 24% affordable housing which will consist of shared equity tenures that will be sold at 75% of market value with a registered affordable housing provider holding a second charge.
- A.37 This proposal has been arrived at through a viability assessment which is submitted with this planning application for the local planning authority's consideration.
- A.38 It is important to note that the application site is allocated for "approximately 50 units" which, if developed out, would have rendered approximately 17 affordable housing units.
- A.39 We consider that it is a material consideration in favour of this planning application that 18 affordable housing units are proposed and supported by a viability assessment.

Development Management Policy DM19 Parking Standards

- A.40 Policy DM19 requires that "proposals for all types of new development will be required to conform to the District Council's adopted parking standards as set out in a Supplementary

Planning Document”.

- A.41 No such SPD exists on the Suffolk Coastal District Council website. In its place is an older type Supplementary Planning Guidance document which refers to outdated County Council parking guidance from 2002.
- A.42 This development proposal has been designed in accordance with the Suffolk County Council 2014 Parking Guidance (Updated in 2015) in compliance with this policy.

Development Management Policy DM20 Travel Plans

- A.43 Policy DM20 applies to new development which would have “significant transport implications”
- A.44 The Highways Statement which accompanies this planning application confirms at its Section 9.0 that “a Travel Plan is not warranted for this site”.

Development Management Policy DM21 Design Aesthetics

- A.45 Policy DM21 states that “Proposals that comprise poor visual design and layout, or otherwise seriously detract from the character of their surroundings will not be permitted. Development will be expected to establish a strong sense of place, using street scenes and buildings to create attractive and comfortable places to live, work and visit. Accordingly, development will be permitted where the following criteria are met:
- *Relate well to the scale and character of their surroundings*
 - *Create a new composition and point of interest*
 - *Provide a positive improvement in the standard of the built environment of the area generally*
 - *Layouts should incorporate and protect existing site features of landscape, ecological, heritage or amenity value as well as enhance such features e.g. habitat creation*
 - *Attention must be given to the form, scale, use, and landscape of the spaces between buildings and the boundary treatment of individual sites particularly on the edge of settlements”*
- A.46 The policy test for refusing planning applications against policy DM21 is high and requires proposals to ‘seriously detract’. We do not consider the proposed design detracts from the

character of the surroundings in any way. Not least because the ‘surroundings’ include a previous development by the same applicants at Garden Square and Gardenia Close.

- A.47 The proposed housing design is of a superior quality with exterior spaces and layouts which create new public spaces and points of interest with the existing neighbouring woodland complimented by the addition of the landscape belt designed as a public open space or ‘trim trail’.
- A.48 We consider the proposed development to not simply meet the policy tests but surpass them in compliance with this policy.

Development Management Policy DM22 Design Function

- A.49 Policy DM22 requires the following relevant matters to be achieved by new developments:
- *To make adequate provision for cars, cycling, garages, parking areas, access ways and footways*
 - *To enable access, turning and manoeuvring for emergency and waste vehicles*
- A.50 The proposed layout has been designed with the input of the applicant’s highways advisor and therefore includes the requisite access and parking requirements in compliance with this policy.

Development Management Policy DM23 Residential Amenity

- A.51 Policy DM23 states that the local planning authority will have regard to a number of criteria in assessing the impact of new development on residential amenity and the design access statement provides the necessary information, alongside the submitted drawings, for the local planning authority to judge performance against these criteria. There are no anticipated conflicts with the requirements of policy DM23.

Development Management Policy DM24 Sustainable Construction

- A.52 Policy DM24 states that “the Council will expect all new developments [...] to use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care in order to reduce emissions linked to changes to the climate and take into account the effects of climate change”.

- A.53 As set out in the design and access section of this statement this development is highly sustainable and environmentally friendly in terms of its resource use and choice of materials etc. in compliance with this policy.

Development Management Policy DM26 Lighting

- A.54 Policy DM26 states that the Council will seek to reduce light pollution from development.
- A.55 No extraordinary or superfluous light sources will arise from this development which is on an allocated housing site and adjacent to other housing.
- A.56 This policy would be complied with.

Development Management Policy DM27 Biodiversity

- A.57 Policy DM27 requires that “all development proposals should protect the biodiversity value of land, maximise enhancement and connection of natural habitats and incorporate beneficial biodiversity conservation features where appropriate” amongst other matters.
- A.58 The ecology reports submitted with this planning application confirms that biodiversity will not be adversely affected at either the site level or the wider habitats level in compliance with this policy.

Development Management Policy DM28 Flood Risk

- A.59 Policy DM28 requires “Proposals for new development, or the intensification of existing development, will not be permitted in areas at high risk from flooding, i.e. Flood Zones 2 and 3.
- A.60 This site is outside of flood zones 2 and 3 and will not increase the risk of flooding elsewhere in compliance with this policy.

Development Management Policy DM32 Sport and Play

- A.61 Policy DM32 states that “Proposals for new residential development will be expected to provide or contribute towards indoor and outdoor sport and play space, including equipment and maintenance, where a local need has been identified. Contributions to off-site provision will be secured as part of the standard charges set in the Community

Infrastructure Levy Charging Schedule, when adopted”.

- A.62 This development will generate CIL revenues that will contribute to local infrastructure needs in compliance with this policy.

Development Management Policy DM33 Allotments

- A.63 Policy DM33 states that “the district council will encourage the provision of new allotments in order to meet demand that might be identified”. The policy test here is for the local planning authority to ‘encourage’ the provision of allotments.
- A.64 The neighbourhood plan policy RNPP3 sets out alternatives to allotment provision including growing spaces and community orchards whilst expressing no preferences. Objective 4 supporting RNPP3 states that off-site provision allotment will be sought where land is not available on site. In this case land is available on site and it is proposed for other RNPP3-compliant uses. The proposal therefore does not necessarily conflict with this policy but instead responds to a more locally specific neighbourhood plan policy.

Site Allocations Policy SSP1 New Housing Delivery 2015 to 2027

- A.65 Policy SSP1 is a derivative of Local Plan policy SP2 which is out of date. Therefore any conflict with policy SSP1 should be given less weight in decision making.
- A.66 Policy SSP1 states that “in order to meet at least the minimum Core Strategy housing delivery for the plan area over the period 2010 to 2027, new housing delivery should be provided in accordance with Table 2 as set out in columns B and C”. This means ‘at least’ the 100 dwellings allocated to Rendlesham.
- A.67 It goes on to state that “in addition to sites with planning permission, and to meet at least the Core Strategy housing requirements for the plan area, new housing provision in the form of new site specific allocations is identified at the following settlements: Settlement – Rendlesham, Allocation 100”. Again this means that the 100 dwellings allocated to Rendlesham are regarded as minimum figures.
- A.68 There are two sites allocated in Rendlesham for housing; SSP12 and SSP13; both for approximately 50 dwellings each; totalling ‘at least’ the 100 dwellings referred to in this policy.
- A.69 There is nothing in policy terms preventing more than 50 being allocated on any one site

and nothing in policy preventing in principle both sites contributing to a cumulative figure greater than 100 dwellings.

- A.70 A planning application for 75 new homes in Rendlesham does not conflict with this policy.

Site Allocations Policy SSP2 Physical Limits Boundaries

- A.71 Policy SSP2 states that settlements such as Rendlesham “are settlements which the Core Strategy has defined as sustainable. The physical limits boundaries identify the parts of those settlements to which new development, particularly new housing development is directed. Accordingly, in principle, proposals for development within the defined physical limits boundary will be acceptable”.
- A.72 This site is an allocated site within the physical limits boundary of Rendlesham and is in compliance with this policy.

Site Allocations Policy SSP12 Land West of Garden Square Rendlesham

- A.73 Policy SSP12 concerns the planning application site directly and states that this site is allocated for “approximately 50 [dwelling] units” and sets out criteria against which planning applications will be assessed.
- A.74 Policy SSP12 requires any development to meet the minimum distance from the Water Recycling Centre which the proposed layout has done.
- A.75 Policy SSP12 requires the provision of a flood risk assessment. This has been done and has concluded no adverse risk of flood.
- A.76 Policy SSP12 requires development to accommodate the sewers that cross the site. The layout has accommodated the sewers and includes proposal to realign them in some cases. The necessary drainage work has been done to ensure this will be achieved without detriment to the existing and wider sewer system.
- A.77 Policy SSP12 requires there to be adequate capacity in the foul network. The drainage report accompanying this planning application confirms that to be the case.
- A.78 Policy SSP12 requires the design, layout, mix and type of housing to be compatible with the housing and transport objectives in the Rendlesham neighbourhood plan. We have set out below our commentary on these objectives which have informed the design and assessment process from the beginning of the process.

- A.79 Policy SSP12 requires the provision of affordable housing. The planning application proposes 24% affordable housing and we have discussed how this relates to the requirements of the Local Plan policy DM2.
- A.80 Policy SSP12 states that “remaining greenspace should be used for a mix of informal open space suitable for daily dog walking, allotments or orchards in accordance with Rendlesham Neighbourhood Plan policy RNPP3”.
- A.81 Policy SSP12 requires the provision of a substantial landscape buffer to the northern and western boundaries where the site abuts open countryside. Despite the site not abutting open countryside anywhere on its northern and western boundaries a substantial landscape buffer has been provided which includes a high quality public open space in the form of a ‘trim trail’.
- A.82 Policy SSP12 requires that an archaeological assessment be provided and this has been done. The report confirms no risk to below ground archaeology requiring preservation in situ or justifying the refusal of planning permission.
- A.83 Policy SSP12 also requires the submission of a transport assessment which again has been done and has concluded that the planning application meets the requirement of the NPPF to provide for safe and suitable access and not to cause a severe residual cumulative impact on the local road network.
- A.84 Policy SSP12 states that, in addition to the criteria discussed above, air quality impacts on the AQMA in Woodbridge need assessing. To the degree this was relevant it has been done and confirmed no impact.
- A.85 This planning application complies with the criteria of policy SSP12. The requirement for ‘approximately 50 units’ does not in of itself preclude a submission for 75.
- A.86 The supporting text to policy SSP12 makes the following relevant comments:
- *“The site was formerly allocated for 75 units”*
 - *“The village has capacity to accommodate more than the 100 homes proposed but is limited predominantly by highway factors”*
 - *“The main limiting factors are its proximity to the water recycling centre, the sewers that cross the site [...] the number of homes and the area on which development could take place has therefore been reduced to approximately 50”.*
- A.87 The reference to ‘highway factors’ is similar to a reference that was included in draft

versions of Policy SSP24 for Bentwaters. The author of this planning statement, acting for the owners of Bentwaters, was able to show that this reference was unjustified and achieved its removal at the Site Allocations Local Plan examination in relation to policy SSP24. At that time no one was making the same argument in relation to policy SSP12 and the comment remained in the adopted document. The submitted transport assessment confirms that highways factors are not a limiting factor for the 75 new homes proposed here.

- A.88 The cordon sanitaire and the sewers have been taken into account in the proposed layout and are no longer 'limiting factors' to the number of dwellings which, through high quality designs, has been returned to the previous figure for this site of 75 new homes.

Rendlesham Neighbourhood Plan Policy RNPP3 Allotment, Orchard and Growing Space Provision

- A.89 Policy RNPP3 requires "new residential or mixed use development is required to make provision towards meeting identified local need for allotments, orchards and growing spaces".
- A.90 This planning application conforms to RNPP3 by providing an area of land for compliant uses.

Community Infrastructure Levy Indicative Calculation



Community Infrastructure Levy Calculator

This calculator allows you to calculate CIL liability for a single use or a mixed use development. Details about the development can be entered into the cream boxes. Once the details of the development have been inserted the total CIL liability is displayed below the table. Please note that this calculator is valid until 31st December 2018.

Existing sqm of in-use buildings to be demolished (E)	<input type="text"/>
Does the Development involve the creation of a new dwelling?	<input type="text" value="No"/>

Development Type	Zone	Total Sqm	New Build Floorspace (sqm)	Converted Floorspace that qualifies under Kr* (sqm)	Converted Floorspace Sqm that does not qualify under Kr* (sqm)
Residential	Adastral Park	0	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Low Value	0	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Medium Value	7890	7890	<input type="text"/>	<input type="text"/>
	High Value	0	<input type="text"/>	<input type="text"/>	<input type="text"/>
Convenience Retail	n/a	0	<input type="text"/>	<input type="text"/>	<input type="text"/>
Comparison Retail	n/a	0	<input type="text"/>	<input type="text"/>	<input type="text"/>
Other Development	n/a	0	<input type="text"/>	<input type="text"/>	<input type="text"/>

Indicative CIL Charge: £803,227.87

If your scheme includes social housing you will be eligible for a discount. Click on this button to find out how much:

**Calculate Social
Housing Relief**

*Kr: see [definition](#) in introduction or in the [regulations](#).

**Back to
Introduction**



Community Infrastructure Levy Social Housing Relief Calculator

If you have social housing as part of the scheme you will be eligible for a discount according to the amount of floorspace used as affordable housing. Please complete the details below once you have completed the main CIL Calculator. Please note that this calculator is valid until 31st December 2018.

Development Type	Zone	New Build Floorspace to be used as social housing (sqm)	Converted Floorspace that qualifies under Kqr* to be used as social housing	Converted Floorspace that does not qualify under Kqr* to be used as social
Residential	Adastral Park	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Low Value	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Mid Value	<input type="text" value="1083"/>	<input type="text"/>	<input type="text"/>
	High Value	<input type="text"/>	<input type="text"/>	<input type="text"/>

Total Social Housing Relief £110,252.95

Revised Total CIL Liability £692,974.92

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*Kqr: see definition on introduction or in the regulations.

DC/18/2374/FUL

Agent

Mr Steven Bainbridge
Evolution Town Planning
Opus House
Elm Farm Park
Thurston
Bury St Edmunds
Suffolk
IP31 3SH

Applicant

Mr Anthony Hardy
Capital Community Developments Ltd



REFUSAL OF PLANNING PERMISSION

Town And Country Planning Act 1990

**The Town and Country Planning (Development Management Procedure) (England)
Order 2015**

Date Valid	13th June 2018
Site	Land To The North And West Of Garden Square And Gardenia Close, Rendlesham (Suffolk Coastal Site Allocation Ref. SSP12), ,
Parish	Rendlesham
Proposal	Proposed residential development of 75 dwellings, car parking, open space, hard and soft landscaping and associated infrastructure and access.

SUFFOLK COASTAL DISTRICT COUNCIL as Local Planning Authority hereby **REFUSE TO PERMIT** the development proposed in your application and plan(s) attached thereto.

The reason for the decision to refuse permission is:

1. The proposal site is also identified within Policy SSP12 (Land west of Garden Square, Rendlesham) of the Site Allocations and Area Specific Policies this identifies that approximately 50 dwellings will be provided within the site as long as it conforms with the other elements of the policy. It has been demonstrated through appeal APP/J3530/W/16/3160194 and Housing Land Supply Assessment, 1 April 2018 to 31 March 2023 (June 2018) that the Local Planning Authority has a 5 year housing land supply. This proposal is for 75 dwellings which is an extra 50% as requested by the policy. This is going to be an over development of the site which is not required to meet the housing need within the District.
2. The proposal does not meet the social objective requirement as stated by paragraph 8 of the NPPF, part I) of Policy SP1 of the Core Strategy and the Rendlesham Neighbourhood Plan.

Planning and Coastal Management

Suffolk Coastal District Council, East Suffolk House, Station Road, Melton, Woodbridge, IP12 1RT
Telephone: (01394) 383789, E-mail: d.c.admin@eastsuffolk.gov.uk
DX: Woodbridge 41400
Website: www.eastsuffolk.gov.uk

There is a concern that the houses are not completely for the open market, as they are to be provided for a very particular specification, for which a waiting list already exists. If this development is only to be for one community and not for wider market housing as it is to be only built to meet one specific need then it would not create an inclusive and sustainable community, nor would it allow for easy integration of this development into the surrounding Rendlesham Communities

3. Policy SP3 (New Homes) requires a mix of different bedroom properties, this proposal is to create too many 4+ bedroom properties that are required for a development of this size and located on the edge of Rendlesham. There is also no mix of the size of housing, there are two and three storey dwellings, maisonettes and flats, but there are no bungalows throughout the site. Therefore the proposal is not in conformity with Policy SP3 and DM21 of the Core Strategy.
4. Policy DM2 (Affordable Housing on Residential Sites) of the Core Strategy requires that there are 33% of affordable housing required on the site, this would be with a 70% affordable rented / 30% shared ownership/equity split, this is a green field site and should be able to support the standard required by the policy. The applicant has stated that there are to be 24% of dwellings on the site that are all to be shared equity and they would not be made available for specific local affordable housing needs. This therefore does not conform to Policy DM2.
5. The development is not in accordance with the NPPF and the Core Strategy. In specific paragraphs 8 b) and 91 of the NPPF, which both require a development to create a socially inclusive development through a well designed and safe built environment. Policy DM21 of the Core Strategy also requires that any development is to create a safe space that is well related to the scale and character of their surroundings, attention must also be given to the form, scale and landscape of the spaces between buildings and the boundary treatment of individual sites. The development is a poorly design development that would not create a safe and socially interactive development.
6. This proposal is not acceptable as it would cause overlooking, overshadowing and a dominating effect on the future residents and current residents of the surrounding site. The proposal does not conform with Policy DM23 of the Core Strategy on this matter and The NPPF specifically paragraph 8 and 127.
7. This application is for more than 50 dwellings and is inside of the 13km Impact Risk Zone of Designated Sites. The current HRA report concludes 'no significant effect', however insufficient information has been provided to demonstrate that this would be the case without mitigation being secured. On site mitigation in the form of an adequate quantity and quality of recreational and dog walking routes would need to be demonstrated and a contribution to the Recreational Avoidance Mitigation Strategy is necessary and would need to be secured as a planning obligation. If the development was to proceed then an Appropriate Assessment would be required to consider the effectiveness of the mitigation to avoid likely significant effects on designated sites.

8. The proposal fails to make adequate provision/contributions (and/or agreement to provide) for facilities/services for the occupants of the dwellings. The applicant has not entered into the necessary legal agreement, which is required to ensure the following is provided:
- o The provision of a third of the dwellings as affordable housing
 - o The provision of a travel plan (?)
 - o The provision and management of open space
 - o Financial contribution towards the Recreational Avoidance Mitigation Strategy.

Notes

1. The local planning authority has identified matters of concern with the proposal and the report clearly sets out why the development fails to comply with the adopted development plan. The report also explains why the proposal is contrary to the objectives of the National Planning Policy Framework and local plan to deliver sustainable development.



Philip Ridley BSc (Hons) MRTPI
Head of Planning & Coastal Management
Suffolk Coastal and Waveney District Councils

Date: 6th September 2018

Planning and Coastal Management

Suffolk Coastal District Council, East Suffolk House, Station Road, Melton, Woodbridge, IP12 1RT
Telephone: (01394) 383789, E-mail: d.c.admin@eastsuffolk.gov.uk
DX: Woodbridge 41400
Website: www.eastsuffolk.gov.uk

PLEASE READ NOTES BELOW

TOWN AND COUNTRY PLANNING ACT 1990

NOTIFICATION TO BE SENT TO AN APPLICANT WHEN A LOCAL PLANNING AUTHORITY REFUSE PLANNING PERMISSION OR GRANT IT SUBJECT TO CONDITIONS

Appeals to the Secretary of State

- If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.
Planning applications: Sections 78 and 79 Town & Country Planning Act 1990

Listed Building applications: Section 20, 21 and 22 Planning (Listed Buildings and Conservation Areas) Act 1990.

Advertisement applications: Section 220 and 221, Town and Country Planning Act 1990
Regulation 15 Town & Country Planning (Control of Advertisements) Regulations 1989.
- If an enforcement notice has been/is served relating to the same or substantially the same land and development as in your application and if you want to appeal against your local planning authority's decision on your application, then you must do so within:
28 days of the date of service of the enforcement notice, or within 6 months [12 weeks in the case of a householder appeal] of the date of this notice, whichever period expires earlier.
- As this is a decision to refuse planning permission for a minor commercial application, if you want to appeal against your local planning authority's decision then you must do so within 12 weeks of the date of this notice.
- Appeals can be made online at: <https://www.gov.uk/planning-inspectorate>. If you are unable to access the online appeal form, please contact the Planning Inspectorate to obtain a paper copy of the appeal form on tel: 0303 444 5000.
- The Secretary of State can allow a longer period for giving notice of an appeal but will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having

Planning and Coastal Management

Suffolk Coastal District Council, East Suffolk House, Station Road, Melton, Woodbridge, IP12 1RT
Telephone: (01394) 383789, E-mail: d.c.admin@eastsoffolk.gov.uk
DX: Woodbridge 41400
Website: www.eastsuffolk.gov.uk

regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

- If you want to appeal against your local planning authority's decision then you must do so within 6 months of the date of this notice

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Appendix 9 Detailed Responses to Officer's Report

APPELLANT'S DETAILED RESPONSE TO THE OFFICER'S REPORT FOR PLANNING APPLICATION REF DC/19/1499/FUL

Notwithstanding the Statement of Case, or other appeal documents, and in the event that it is necessary, this document provides a comment by comment response to the officer's report. Had the LPA have engaged positively with the applicant at any time during the planning application then the LPA could have been better informed.

The officer's report is poorly structured, often poorly written and lacks cohesiveness. Nevertheless it was signed off by the Planning Development Manager. Therefore, with no clear structure to follow this response has had to respond to the points made by the LPA sentence by sentence or paragraph by paragraph as relevant. Due to the level of repetition in the officer's report where a response has already been provided to a point that has been made clear; it does not mean there is no answer to that point.

This response starts from the 33rd unnumbered page of the officer's report. Text in black italics has been extracted from the officer's report. Text in blue is the appellant's response. The appellant has numbered the paragraphs from the officer's report for ease of reference, otherwise, the text from the officer's report remains unaltered.

Planning Considerations

Principle of Development

1. The proposal site is located within the Rendlesham Physical Limits Boundary, which is identified by Policy SSP2 (Physical Limits Boundaries) of the Site Allocations and Area Specific Policies document, this is a Key Service Centre as defined in the settlement hierarchy in Policy SP19 (Settlement Policy). Therefore Policy SP27 (Key and Local Service Centres) is to be applied to the application, which states that housing will be permitted within defined physical limits of Key and Local Service Centres.

2. The proposal site is also identified within Policy SSP12 (Land west of Garden Square, Rendlesham) of the Site Allocations and Area Specific Policies document, this identifies that approximately 50 dwellings will be provided within the site as long as it conforms with the other elements of the policy, which are to be covered in the rest of this report.

3. This proposal is for the development of 75 dwellings within the site, this is greater than the 50 stated by the policy by an extra 50%.

4. Discussions have been held with the developer, that it may be possible to increase the numbers of dwellings on the site as the policy states that 50 is an approximate figure, provided the scheme is acceptable in all other respects and material planning considerations, which are to be discussed through this report. If the material planning considerations are not acceptable then the housing numbers would need to be reduced and also ensure that it is acceptable in all other respects.

Historically from 1997 to 2014 the site had an allocation of 75 units. In the SHLAA of March 2014 and in the Preferred Options consultation of October 2015 the allocation was reduced to approximately 50 units because of the perceived limiting factors of highways, education, cordon sanitaire and sewers.

The existing Suffolk Coastal Local Plan accepts that *the village has capacity to accommodate more than the 100 homes proposed ...* (there are two sites, each allocated approximately 50 units) but reduces the overall allocation to 100 units because of the limiting factors.

In September 2018 and January 2019 the Appellant has made representations under the Draft Local Plan Review and has taken each limiting factor in detail and demonstrated that there is no evidence to support them. The allocation has been reduced unnecessarily, ref Planning Statement, Appendix 4. The Appellant has shown that the nett developable area is 3.2 hectares and this can accommodate 96 dwellings at a reasonable density of 30 dwellings per hectare, let alone 50 or 75.

The LPA has made a subtle but important change in its position on the number of dwellings. In the refusal of the first planning application in September 2018 the LPA said that 75 dwellings did not comply with policy SSP12 and ... *this is going to be an overdevelopment of the site*. In the second pre-application of November 2018 the LPA said *more dwellings may be acceptable if it can be proven that there is no adverse effect on the future and current residents of the site*. Similarly, in this refusal of the second planning application, the LPA are saying *it may be possible to increase the numbers of dwellings ... provided the scheme is acceptable in all other respects*.

5. The Council's Housing Land Supply Statement (June 2018) (covering the former Suffolk Coastal area) demonstrates that the Suffolk Coastal area has a 5 year housing land supply and that the position of having at least 5 years supply of housing land has been upheld at subsequent appeals.

6. The later appeals have considered later iterations of the housing need figure as calculated under the standard method, which have been higher than the figures used in the 2018 Housing Land Supply Statement and are closer to or greater than the Local Planning Authorities current housing need figure of 542 dwellings per year. The figure of 542 is as calculated using the standard method under the current PPG. This figure is for Suffolk Coastal (not for the Local Planning Authority as a whole). They have also tested the deliverability of supply sites with Inspectors concluding that a supply in excess of 5 years exists.

7. As the Local Planning Authority can demonstrate a 5 Year Housing Land Supply, it is considered that any development proposal on allocated sites will need to be determined in accordance with the relevant site allocation policy for that site. In this instance Policy SSP12 is to be applied to the application, therefore it is recommended that this development should conform to the approximately 50 houses as required within the Policy.

Historically the appeal site was allocated 75 units. The reduced allocation of approximately 50 units in the existing Local Plan is based on perceived limiting factors, but they are not supported by the evidence.

8. At this point the proposal does not meet the requirements of the Policy SSP12 as it is for 75 dwellings not 50 dwellings, therefore there is a principle objection to the allocation. The proposal is not compliant with Policy SP1 Core Strategy, and Policy SPP12 of the Site Allocations and Area Specific Policies. As this does not make it unacceptable in itself, all other matters are to be discussed below.

9. Policy SCLP 3.1 of the emerging Local Plan states that there will be a significant boosting in the supply of housing, the mix of housing available and the provision of affordable housing, through the delivery of at dwellings through the plan period as set out in the plan. Policy SCLP 3.2 of the review then locates these dwellings that are to be provided within the Physical limits boundaries and site allocations, unless the development meets other policies in the Local Plan. Rendlesham is identified as a Large Village in Policy SCLP 3.2, which is therefore considered to be a sustainable location for development.

Emerging Policy SCLP3.1 is important in that it seeks to *deliver an ambitious plan for growth over the period 2018-2036 in Suffolk Coastal ... and one means for achieving this is ... significantly boosting the supply of housing ...*

The site allocations should be viewed as minimum numbers, not as maximum numbers.

10. This proposal is located as part of an allocation that is identified through Policy SCLP 12.62 of the emerging Local Plan. The site is also within the settlement boundary as identified by emerging Policy SCLP 3.3 of the review.

11. Emerging Policy SCLP 5.1 refers to the development of houses in larger villages (which Rendlesham is identified as), it states that residential development will be permitted within defined Settlement Boundaries where it is of a scale appropriate to the size, location and character of the village.

12. This is considered to be an appropriate location for residential development as it is an identified site, but there is a concern on the function, layout and the design of the site, which is to be considered below.

13. The proposal is located within the site allocation of SCLP12.62 of the emerging Local Plan It is considered that the proposal does not conform with Policy SCLP12.62 on all points, under part d) the design, layout, mix and type of housing is not compatible with the 'made' Rendlesham Neighbourhood Plan.

The LPA lists 3 'concerns' in an attempt to constrain the number of dwellings. The first of these is criterion (d) of emerging Policy SCLP12.62 which requires: *The design, layout, mix, and type of housing proposed is compatible with the housing and transport objectives set out in the 'made' Rendlesham Neighbourhood Plan.*

The LPA expands this theme in later paragraphs and the Appellant's replies are below the relevant paragraphs:

- Paragraphs 16 to 28. Affordable housing, open market housing and housing mix.
- Paragraphs 29 to 104. Design and function of the site.

- Paragraphs 105 to 135. Impact on residential amenity.

14. The remaining greenspace is for a mix of informal open space which may be suitable for dog walking, but will not be easily accessible by the future residents of the site due to the poor links around the site. The layout plans do not demonstrate a dog walking or recreational route around the site. There are no allotments or orchards proposed within the development, this is a requirements of the Rendlesham Neighbourhood Plan policy RNPP3, and Policy SCLP12.62.

Similarly the LPA expands this theme in later paragraphs and the Appellant's replies are below the relevant paragraphs:

- Paragraphs 34 to 41. BFL heading 'Connections'.
- Paragraphs 84 to 85. BFL heading 'Public and Private Spaces'.
- Paragraph 95. Allotments and orchards.
- Paragraph 150. Dog walking and recreational route.

15. SCLP12.62 recognises the sewers crossing the site and this alignment of these is clearly set out in Enclosure 5 of the Design and Access Statement. With particular regard to the sewer passing east- west across the site, this is currently below the proposed location of plots 19, 21, 24, 25, 28, 29, 31, 35, 38 which accommodate 20 units. The application suggests the sewer will be relocated but provides no detail on where or how. The relocation of such a length of existing sewer is a significant infrastructure burden on a site of this scale and the ability to undertake this work should be demonstrated as part of the application in order to show that the proposed layout can be achieved. Without this certainty the deliverability must be questioned and it does not comply with Policy SCLP12.62 in that respect.

The submitted viability report demonstrated the sewer diversion work had been costed as part of the application. Further, the LPA expands this theme in later paragraphs 144 and 145, and the Appellant's replies are below the relevant paragraphs.

Affordable Housing, Open Market Housing and Housing Mix

16. Policy SP3 (New Homes) requires a mix of different bedroom properties, the below table states the required mix and the proposed mix.

Bedrooms	1	2	3	4+	Total
Open Market Housing (50)	3	16	20	22	50
Affordable Housing (25)	11	7	4	3	25
All Sectors (75)	10	24	26	15	75
Proposed Development (75)	14	27	20	14	75

17. As set out above, it is considered that overall the proposed development would provide an appropriate amount of one bed properties, more two bedroom properties than the minimum required, an appropriate number of three bedroom dwellings and less four bedroom properties than are required by the Policy SP3.

18. This is an allocated site for 50 dwellings (SSP12) located on the edge of Rendlesham, which is a sustainable location. Therefore the housing mix should be further aligned with Policy SP3.

See Housing Mix Table in Appendix 5 of the submitted Planning Statement.

The proposed development does provide a mix of different house sizes: 14 x one-bedroom properties, 27 x two-bedroom properties, 20 x three-bedroom properties, and 14 x four-plus-bedroom properties.

... the housing mix should be further aligned with Policy SP3. Policy SP3 states: The strategy will be to increase the stock of housing to provide the full range of size, type, and tenure of accommodation. To achieve this the policy sets out target proportions of house sizes that meet the profiles set out in the Strategic Housing Market Assessment (SHMA). Table 3.6 is headed target proportions of house sizes and there is a footnote: Table to be updated on a regular basis to reflect latest published guidance. Table 3.6 is not intended to be mandatory or rigid.

Significantly the target proportions have changed in light of the more recent SHMA of 2017. Table 5.1 of the emerging Local Plan (January 2019) has a very different mix to Table 3.6 of the existing Local Plan (July 2013):

Bedrooms (all sectors)	1	2	3	4+	Total
Table 3.6 in %	13%	32%	35%	20%	100%
Table 3.6 in units	10	24	26	15	75
Table 5.1 in %	12%	29%	27%	33%	101%
Table 5.1 in units	9	22	20	25	76
Proposed development	14	27	20	14	75

The housing mix of the proposed development is reasonably aligned to the updated target proportions of January 2019. Furthermore, at the request of the LPA in the refusal of the first planning application in September 2019, the Appellant made changes to the mix in the second application to bring it more in line with the recommended mix.

19. Policy DM2 (Affordable Housing on Residential Sites) of the Core Strategy requires that there are one in three affordable houses required on this site, as it is above 0.5 hectares in size and above ten dwellings (as per the thresholds set out under paragraph 63 of the NPPF).

20. The applicant has offered 25 affordable dwellings (which is policy compliant) and has agreed that 12 (48%) of the affordable units would be affordable rented and 13 (52%) of the affordable units would be for discounted market sale. This could be acceptable within the Parish of Rendlesham. However, there is no indication within the application which properties are to be affordable. Therefore it is unclear what the sizes, locations and designs of the units would be.

It is important to note that the Appellant has offered the full 33 pct affordable housing requested by the policy but this has been at great cost to the Appellant. The Economic Viability Assessment (EVA) concludes that at a normal profit margin of 18 pct on open market units and 6 pct on affordable housing units, and with the preferred tenures of 12 affordable

rent, 6 shared ownership, 7 discounted market sales (DMS) units, the residual land value is 32 pct of the benchmark land value and the scheme is not economically viable.

However at a reduced profit margin of 6 pct on open market units and 6 pct on affordable units, and with tenures of 12 affordable rent and 13 DMS units, the residual land value is 87 pct of the benchmark land value and the scheme is marginally economically viable. The EVA states that 6 pct on open market units (instead of 18 pct) is an uncommercially low profit rate.

... no information ... which properties are to affordable. The Appellant provided this information in the EVA and in the Planning Statement, and later on 12 June 2019 in an Affordable Housing Location Plan which was an appendix to the draft Section 106 Agreement. The LPA did not request any further information prior to refusal.

The 12 affordable rent units consist of:

10 x one-bedroom flats of 47 m2 each. Sudbury ground floor and first floor one-bedroom flats.

2 x two-bedroom flats of 59 m2 each. Sudbury ground floor and first floor two-bedroom flats.

And the 13 DMS units consist of:

8 x two-bedroom flats of 59 m2 each. Sudbury ground floor and first floor two-bedroom flats.

5 x two-bedroom flats of 84 m2 each. Sudbury second floor two-bedroom flats.

There are 25 Sudbury flats in 5 buildings on the site, and all 25 are either affordable rent or DMS.

21. The Council's Head of Housing has advised that the affordable dwellings are at the following mix:

12 Affordable rent, comprising:

1 bed flat - 4

1 bed bungalow - 2

2 bed houses - 3

3 bed houses - 3

13 Shared Ownership and Discounted open market comprising:

2 bed houses - 7

3 bed houses - 6

22. It has been recommended by the Head of Housing that the 13 units for discounted market sale should be provided with six of these for discounted market sale/fixed equity and seven for shared ownership. This would be closer to the mix that has been identified in the Strategic Housing Market Assessment 2017 (SHMA).

23. From the mix stated above as recommended by the Head of Housing, there would need to be a re- design of the dwellings on the site in order to meet the required housing mix for affordable units. For example, both of the bungalows are proposed as three bedroom

properties. There are no two bedroom houses, just maisonettes and flats. As a full application the specific affordable units should be shown on the submitted layout plan.

This consultation response from East Suffolk Council Head of Housing does not seem to appear on the website. It is the first time the appellant has become aware of it. The LPA did not share it during the planning application.

The recommendation is very prescriptive. It does not seem to be part of Policy DM2. Table 3.6 in Policy SP3 gives target proportions for bedroom size but not for type and tenure:

Bedrooms (affordable)	1	2	3	4+	Total
Table 3.6 in %	43%	31%	16%	11%	101%
Table 3.6 in units	11	8	4	3	26
Proposed development	18	7	--	--	25

The Appellant has provided the full quota of affordable housing (25 units) and has done so at some considerable cost. The EVA makes clear that this requires the Appellant to accept an uncommercially low profit rate of 6 pct instead of 18 pct on the open market units.

This analysis is based on a scheme of 12 affordable rent units consisting of 10 x one-bedroom flats (47 m2) and 2 x two-bedroom flats (59 m2), and 13 DMS units consisting of 8 x two-bedroom flats (59 m2) and 5 x two-bedroom flats (84 m2). Any change to the mix will inevitably make the development less viable and reduce the overall number of affordable housing units.

There are two-bedroom and three-bedroom maisonettes (Bealings) and three-bedroom semi-detached houses (Glemham). Some of these could be part of the mix of affordable housing, but since they are larger and more expensive than the one-bedroom and two-bedroom flats, it would be necessary to reduce the total number of affordable housing units to remain at the same level of economic viability.

24. The original submission did not include draft heads of terms for a s106 agreement and a draft S106 was submitted to the Local Planning Authority in the later stages of the application process. As it is considered to be at a draft stage it does not have enough detail nor has it been negotiated to agree the split of affordable dwellings, the wording of the s106 and how this is going to be allocated to a registered provider. The draft s106 is noted but due to the other issues with this application it cannot be progressed further in negotiation and will remain unsigned at the time of the decision. A reason for refusal for the lack of a signed s106 to secure affordable housing and other obligations is therefore a reason for refusal. It is possible that a s106 could be agreed and signed post decision should the application progress to appeal.

The Appellant submitted draft heads of terms for a Section 106 agreement at the very start of the planning application, ref Planning Statement, paragraphs 7.1 to 7.12.

The LPA did not respond or provide any feedback on this matter. Despite this the Appellant submitted a draft Section 106 Agreement of 23 pages on 12 June 2019. The LPA acknowledge this but write: *The draft s106 is noted but due to the other issues with this application it cannot be progressed further.*

25. The design, form and function of the site is discussed below, however, this development would have a bespoke design and form not typical of affordable housing units usually made available as s106 properties in the area. Considering that registered providers bid for s106 properties and prices paid a generally cost price only there is no information within the supporting information to demonstrate that the bespoke housing design and form would be acceptable in terms of accommodation to Registered Providers and also what service charges they might be expected for the maintenance of the shared spaces and unadopted roads. Due to the bespoke design of the scheme/buildings additional reassurance should be provided by the applicant to demonstrate that this would be acceptable.

... a bespoke design and form ... The affordable housing units consist of one-bedroom and two-bedroom flats. They regular one-bedroom and two-bedroom flats of a certain floor area and price band like any others in Rendlesham. There is nothing bespoke about their design or form.

... no information ... that the bespoke housing design and form would be acceptable ... to Registered Providers. The Appellant has been in discussion with Registered Providers and in August 2018 agreed to appoint Rex Housing Ltd as the Registered Provider for the affordable housing units. Rex Housing have confirmed they are *delighted with the proposed mix and design ...*, ref their letter of 30 September 2019.

26. Throughout the site all of the proposed properties are proposed to face east, there is no variation on this through the site. There is no justification in the application to why all of the properties are to face east and why there is no variation through the site. There is a concern that the proposed layout/rigid orientation of the site is only going to be appropriate for a small section of the housing market, and that it results in a number of other issues related to visual and residential amenity (explored in later sections of report). There is no justification in the applications supporting statement for the proposed layout and orientation of the dwellings. The houses should appeal to all sectors of the housing market and be designed around good urban design principles.

... no justification ... for the proposed layout and orientation ... The Planning Statement explains that the development draws on principles of architecture known as Maharishi Vastu which promote the health and well-being of the occupants of buildings. The key principles are right direction, right placement of rooms, right proportion, and the use of natural and non-toxic materials. The orientation of a building has an important effect on the quality of life of its occupants. The design seeks to maximise the many recognized benefits of natural light for the mental and physical health of the occupants.

The LPA have been aware of these architectural principles for 15 years. They are embedded in the layout of Garden Square and Gardenia Close, for which planning permission was granted in October 2004. The Appellant referred to these architectural principles in the pre-application of November 2017, the full application of June 2018, the second pre-application of November 2018, and the second full application of April 2019.

... no variation through the site ... There are 37 buildings on the site. 10 of these (Glemhams, Bealings) have dual entrances on two elevations – north and east.

The houses should appeal to all sectors of the housing market ... The proposed development is an extension of the existing development on Garden Square and Gardenia Close, which has broad appeal to different sectors of the housing market.

27. The proposal is not considered to be in conformity with Policy SP3 and DM2 due to the lack of information that has been submitted to the Local Planning Authority.

There is no evidence to suggest that the proposal does not conform with Policy SP3 (New Homes) and DM2 (Affordable Housing on Residential Sites).

... lack of information ... The Appellant submitted detailed information on the mix of house sizes and on the affordable housing units in the Planning Statement, the Economic Viability Assessment, and the draft Section 106 Agreement. The LPA did not request any further information prior to refusal.

28. Emerging Policy SCLP 5.8 requires that as there are more than 10 units proposed on the site, at least 50% of the dwellings need to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations, and will be required to demonstrate how the proposal contributes to increasing the choice and mix of housing available for the older population. From the information that has been provided within this application, the scheme would not include the required accessible and adaptable dwellings. Therefore this scheme is contrary to emerging Policy SCLP 5.8, however this cannot be a reason for refusal at this point in time.

The Appellant supports the aim of this policy. The dwellings comply with the mandatory Requirements M4(1) Visitable Dwellings and with many of the optional Requirements M4(2) Accessible and Adaptable Dwellings.

Design and function of the site

29. The design and function of the site, external appearance of buildings/form/detailing, internal building layout, building functionality formed a refusal reason for application DC/18/2374/FUL and has been raised in both of the previous pre-applications. The external appearance of buildings/form/ detailing, internal building layout, building functionality is also not considered to be acceptable in regards of this application.

30. Both the NPPF in section 12 and Policy DM21 of the Core Strategy refer to the need to have good design.

31. NPPF paragraph 129 refers to assessment frameworks such as Building for Life 12 (2015) (BFL12) and how they should be used in assessing applications and that Local Planning Authorities should have regard to the outcome from these processes. As a Local Planning Authority we are moving towards using BFL12 as the assessment framework for the design of developments. This is adopted policy in the area of East Suffolk covered by the Waveney Local Plan and is part of the emerging local plan (Policy SCLP11.1 - Design Quality) for the former Suffolk Coastal area and is a nationally recognised assessment framework.

32. Policy DM21 of the Core Strategy is most relevant to the consideration of the design of this development. The Policy refers to the need for proposal to be well related to the scale and character of their surroundings, and that the form, density and design of proposals should create a new composition and point of interest, which will provide a positive improvement in the standard of the built environment of the area generally. Layouts should incorporate and protect existing site features of landscape, ecological, heritage or amenity value as well as enhance such features. Also attention must be given to the form, scale, use, and landscape of the spaces between buildings and the boundary treatment of individual sites, particularly on the edge of settlements.

33. The BFL12 document has similar mean aims and objectives to that of Policy DM21, the document is to be used to structure this element of the delegated report as it helpfully sets out a wide range of material planning considerations irrespective of the policy position. Both the NPPF and Core Strategy will be used to assess these different elements.

The Appellant believes that the LPA have used BFL inappropriately. The BFL 2018 foreword states:

BFL 12 is primarily a discussion tool – a framework around which issues and ideas can be explored. BFL 12 therefore works best if used at the start of the planning process. BFL 12 is not designed to be used in isolation as an assessment tool once a planning application has been submitted. If BFL 12 has not been used throughout the planning process we do not support its use as a justification for the refusal of a planning application.

The Appellant submitted a pre-application in November 2017, a full application in June 2018, a second pre-application in November 2018, and a second full application in April 2019. The LPA first mentioned BFL in June 2019. There was no mention of BFL from November 2017 until June 2019. In this Delegated Report BFL is clearly been used as an assessment tool after a planning application has been submitted, and as a justification for refusal.

The Appellant pointed this out to the LPA at the meeting on 12 June but they have persisted in using BFL as a justification for refusal.

The higher purpose of BFL is to *guide development proposals towards better design*. The Appellant has devoted an enormous amount of time and attention to achieving better design. There have been more than 100 design group meetings over a period of 4 years. The key members of the Appellant's team are residents of Garden Square and Gardenia Close, the existing development adjacent to the appeal site. They have lived and worked in close proximity to the appeal site for 10-15 years. They have direct, first-hand, practical knowledge of the appeal site. They also have a deep personal interest in achieving better design.

BFL 1. Connections - Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones, while also respecting existing buildings and land uses around the development site?

As can be seen from the Access and Parking Plan, vehicles can come in and out of the development via Garden Square to the east and via Tidy Road to the west. Pedestrians and cyclists can come in and out of the development via Garden Square and Tidy Road (both have

pavements), and also via Gardenia Close and Peace Palace Gardens into the feature space next to Plot 15.

Within the development there are minor access roads with pavements, shared surface roads, and private driveways. There is a central east-west road with that goes through the development and connects the two access roads from Garden Square and Tidy Road.

There is good connectivity with the village on the south. The two access roads create good linkages to the existing developments on Garden Square and Gardenia Close, the Redwald Estate, and Tidy Road and Mayhew Road. There is a proposed bridleway on the eastern boundary which will eventually connect to the land to east of the appeal site.

34. It is considered that the main vehicular entrance into the site, due to the distribution of properties through the overall site, would be from Tidy Road as the Garden Square entrance is further away from most of the houses. Third party land exists between the adopted extent of Tidy Road and the area that this development is to take place. The applicants have served notice on the owners of this land. However, the Tidy Road access would need to be secured (if permitted) through a Grampian Style condition for implementation prior to commencement of the development. The Garden Square access is a continuation of an unadopted estate road. There are no ownership boundaries to the delivery of this access although the delivery of this route as a public highway leading on to Sycamore Drive is also reliant the unadopted section of Garden Square being adopted. Importantly the ability to secure pedestrian pavement/footways to the existing highway needs to be accommodated in the full extent of adopted highway.

The Appellant believes that Garden Square will be *the main vehicular entrance*, not Tidy Road. Tidy Road and Mayhew Road are winding and awkward. Garden Square is straight, and also more convenient as it brings you onto Sycamore Drive at a point closer to the village centre, Acer Road, and the A1152.

There is no third party land between the end of Tidy Road and the appeal site. It is true that there is a thin wedge of land between the end of Tidy Road and the appeal site. However this is part of the purchase of the appeal site and it is included in the land purchase contract. It has its own Land Registry reference SK375575. The Appellant has confirmed this to the LPA by email on 28 May 2019.

Garden Square has been built to an adoptable standard, but has not been adopted. Garden Square will be the route for construction traffic during the three years of construction of the proposed development. The Appellant proposes to arrange for the road to be adopted after the construction programme has been completed.

There is already a footway from Sycamore Drive along Garden Square onto the appeal site.

35. Other pedestrian access to the site is very limited, there is one separate pedestrian route through the Peace Palace, this crosses private land which does not form part of the application site, and is not a Public Right of Way, so cannot be given the weight as a publicly accessible connection.

There is pedestrian access into the appeal site via Garden Square and Tidy Road, and also via Peace Palace Gardens and Gardenia Close. Gardenia Close has not been adopted, but it is publicly accessible. It provides access to 33 dwellings on Gardenia Close and Peace Palace Gardens, and to the Maharishi Peace Palace, a 30 bedroom residential educational facility.

36. There are no public rights of way north, east or west of the site. Rendlesham is well known for its very limited range of public rights of way surrounding the village with an no public access into the countryside to the north and limited routes to the south. This is an important consideration later in respect of Habitat Regulations considerations. The Highway Authority response includes a public right of way s106 funding request for a route on the eastern boundary of the site but it is unclear where this would be or lead.

Suffolk County Council Public Rights of Way have requested that a bridleway along the eastern side of the site so as to link the proposed development to the wider countryside, and also a financial contribution for signs and waymarking. The bridleway has been incorporated into the site layout, and the Appellant has accepted the financial contribution, reference the draft heads of terms for a Section 106 Agreement in the Planning Statement (page 53).

37. This is a very road dominated scheme, because of the design being proposed in this application traditional perimeter blocks cannot be used. The design creates 10 cul-de-sacs from the main spine road. The Highway Authority has indicated that it would only consider adoption of the main spine road. Other routes will need to be privately maintained and no details of management of those roads has been submitted. That should form part of a management strategy (including public open space) within the s106 agreement.

There are three categories of roads – minor access roads, shared surface roads, and shared driveways in different surface materials, with extensive planting. The different surface materials and the soft landscaping will soften the impact of the roads.

The Highway Authority have confirmed that a length of the minor access road may be suitable for adoption, subject to detailed design. The Appellant does not intend to get the shared surface roads or shared driveways adopted. These will be privately maintained. The shared surface roads and shared driveways in the existing development on Garden Square and Gardenia Close have been privately maintained by a management company for about 15 years. The maintenance is funded by an estate rent charge paid by residents. The Appellant intends to set up a similar estate management company for the proposed development to maintain the non-adopted roads and public open space.

38. The new open space and play area is located in the north east corner of the site. It is located within the cordon sanitaire of the waste water treatment plant and therefore there is a concern that this would not be effectively used, due to the potential odour impact on the site. Its value as mitigation in respect of Habitats Regulations and as necessary public open space is therefore in doubt and odour effects have not been adequately addressed in the submission.

This point is out of place under this BFL heading on Connections. Nonetheless it is false. The Appellant submitted an Odour Assessment carried out by Air Spectrum in May 2018 which

showed that the odour level concentrations in 4 receptor locations distributed throughout the site were on average about 0.0053 OUe (European odour units) per m³. This is more than 20 times below the threshold of 1.5 OUe per m³ for offensive odours.

Although the public open space and the play area are in the cordon sanitaire designated by Anglian Water (110 m radius from the centre point of the Water Recycling Centre, or 70 m from the site boundary), there is no evidence that there will be odour nuisance. Air Spectrum have carried out a new Odour Assessment in September 2019 which confirms the results of May 2018. The public open space and the play area will be effectively used.

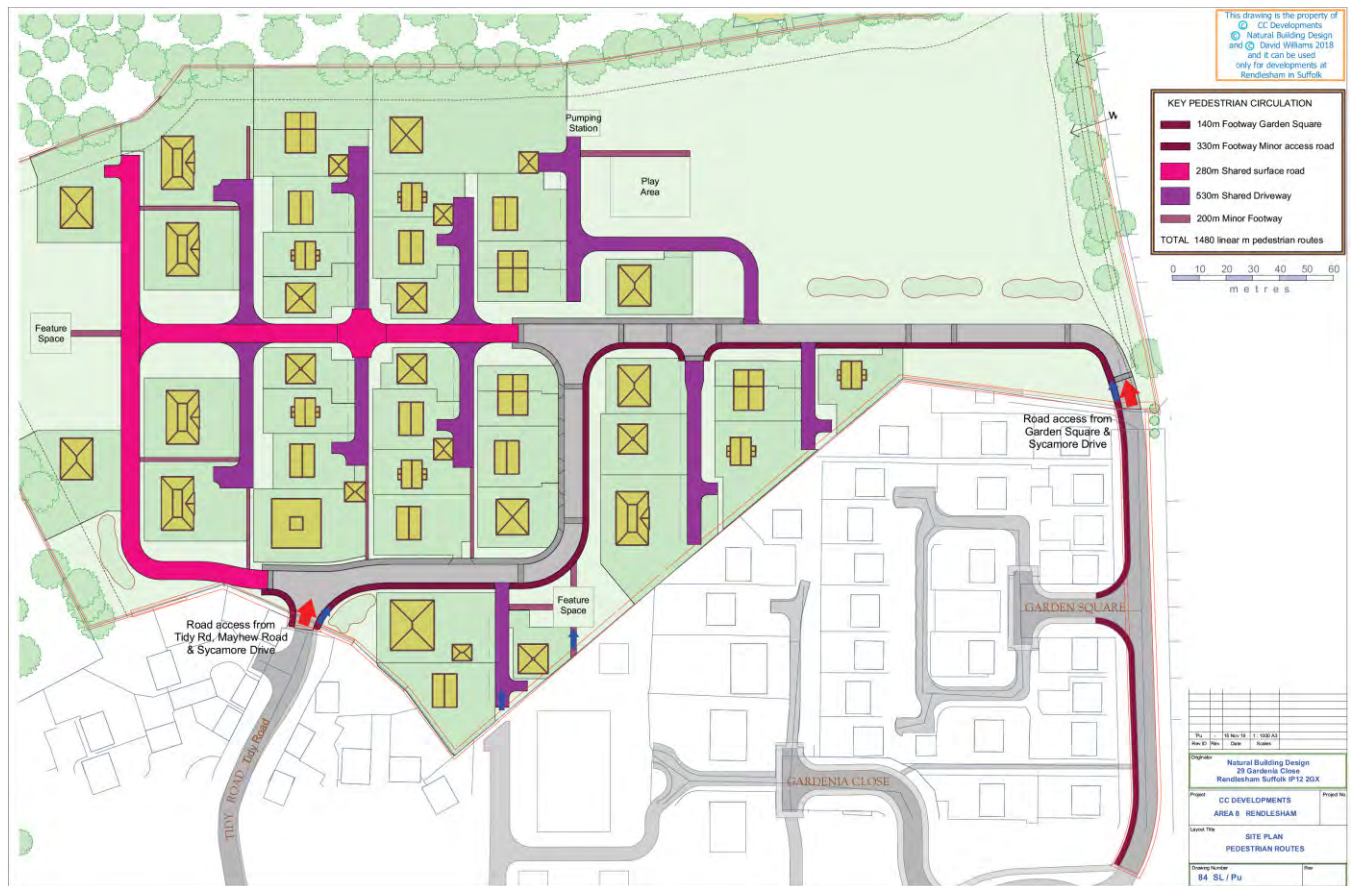
39. This proposal does not demonstrate that it would create a walkable neighbourhood, no pavements other than on the main access roads are proposed to be provided, and there are proposed to be very limits pedestrian paths and in some instances no pedestrian paths between the cul-de-sacs, leading it to be a very car dominated. Specifically out of the 37 plots only 15 dwellings would be directly accessible from a foot path. All of the other plots can only be accessed by road and therefore car or other vehicle. In some instances, with effective shared surface design such highway layouts can be we suitable pedestrian environments though that has not been demonstrated in this case and it is unlikely that such routes would be adopted given current restrictions on the adoption of shared surface roads. Most of the cul-de-sacs serve a small number of dwellings and therefore this is less of a concern but the lack of footways and pedestrians routes through the centre of the site and the western part cause obvious barriers to pedestrian movement.

The proposed development does create a walkable neighbourhood as with Garden Square and Gardenia Close next door. Pedestrians can use the pavements along the minor access road, the shared surface roads, the shared driveways, the footways (next to Plots 12, 9/8, and 5/4), and the bridleway. The pedestrian routes come to a total of 1.6 km:

- 140 m of pavement along Garden Square.
- 330 m of pavement along the east-west spine road.
- 280 m of shared surface roads.
- 530 m of shared driveways.
- 200 m of footways.
- 120 m of bridleway.

In addition pedestrians can use the footpaths through the two feature spaces and the large area of public open space to the north-east.

There are different surface materials for the different categories of roads – tarmac for the minor access roads, tarmac and gravel for the shared surface roads, and permeable clay pavers for the shared driveways, ref Planning Statement page 37. This design will create a pedestrian-friendly environment. There are no barriers to pedestrian movement.



40. Due to the cul-de-sac layout the routes through there will be no active frontages adjoining many sections of the roads and pathways. There will be areas that are not well overlooked, especially the main spine road. Houses do not appear to have been designed with regard to their specific plot's relationship to public areas, resulting in elevations with limited or no fenestration adjoining public areas. These include plots 1, 4, 8, 12, 14, 17, 21, 25, 29, 31, 32, 33, 34, 35, 37 and 38

These points are out of place under this BFL heading. An active frontage is defined as *an active visual engagement between those in the street and those on the ground floor and upper floors of buildings*. All the north-south roads and driveways have active frontages, because the front entrances and front elevations of 37 buildings face onto them.

The east-west central road has 4 buildings with north entrances facing onto it - Plots 37, 3, 7 and 11. All the other buildings along the east-west road have either north or south elevations facing onto the road. Having side elevations on streets does not remove visual engagement.

The main spine road will have good natural surveillance from the 12 buildings that adjoin it - Plots 38, 37, 34, 3, 7, 11, and 14 on the south side and Plots 35, 31, 29, 25, and 21 on the north side.

... *elevations with limited or no fenestration adjoining public areas*. All the property designs have ample fenestration on the east, south, and west elevations and limited fenestration on the north elevations (to reduce heat loss). There are no elevations with no fenestration. There are buildings on Plots 12, 14, 21, 20, 18, and 19 that adjoin the public area to the west. There

are buildings on Plots 15, 1, and 32 that adjoin the public area to the south. There are buildings on Plots 38, 37, 34, 35, 31, and 30 that adjoin the public area to the north-east.

41. A number of pedestrian routes will pass the rear of people's homes, others are blocked by car parking spaces. There are spaces within the development where it is not clear if these can be passed through are they public or private. This includes the area to the south of 21 and north of 14. East of plot 4, 8 and 35.

There are 3 pedestrian routes which pass the rear of Plots 8, 4, and 1, but they are short (40-60 m each). These pedestrian routes connect the shared driveways to the minor access road to the south. There will be 2 m high fences at the rear of the properties to maintain privacy and security. There are no pedestrian routes blocked by car parking spaces.

... public or private. The area in between Plots 14 and 21 is a public area. The areas to the east of Plots 4 and 8 are private, and small. The area to the east of Plot 35 is private up to the parking spaces, and public beyond that. The public and private areas are shown more distinctly on the Access and Parking Plan.

BFL 2. Facilities and services - Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?

Rendlesham is the redevelopment of the former domestic base of RAF Bentwaters. There are some existing facilities and services in the village centre, but also a need for more. The proposed development is within walking distance of community facilities and services such as shops, a primary school, workplaces (Rockford House, Bentwaters Business Park), parks (Jubilee Park), play areas (village green, Jubilee Park), and a café. The Rendlesham Neighbourhood Plan designates the land in the village centre for more facilities and services. The proposed development provides a financial contribution to expand community infrastructure through the CIL payments.

The proposed development provides some facilities and services within the development - about 5 acres of green space, including a play area, community orchards, two formal gardens, and informal open space.

42. Services are available in the village centre which is within walking/cycling distance, but as stated above there would be a lack of connectivity, because are many plots would not be served by footpaths. Therefore the residents will need to walk along the road to access a footpath if they are to walk, this does not increase the distance between plots but will increase the likelihood of residents to rely on private motor cars to access services and facilities.

There is good connectivity, ref previous heading. The village centre is 150-300 m from the proposed development. There is no reason to believe that residents will rely on motor cars.

43. The proposed play area would also be remote from some of the houses in the new development and appear to have been used as part of the Cordon Sanitaire Its currently proposed location also means that there would be minimal active surveillance from properties which could result in both perception of and actual issues with anti social behaviour. The

effectiveness of the open spaces overall is poor and it does not demonstrate good urban or landscape design.

The play area is not remote. It is next to Plots 35, 31, and 30. None of the 75 dwellings is more than 180 m away from it.

The play area has good natural surveillance from Plots 38, 37, 35, 31, and 30, and also indirect surveillance from Plots 34, 3, 7, 29, 28, 27, and 26. There is no reason to suggest that the play area and the other open spaces will not be used effectively.

44. There are two areas that are indicated to be feature spaces, but it is not clear, what their purpose would be, who these are going to be available to and what features they are going to have on them. Therefore it is a concern if they will truly serve the new and existing residents.

The site masterplan, the landscaping plan, and the planning statement state that the two feature spaces are formal gardens and are part of the public open space. The key members of the Appellant's team are residents and therefore they have a strong interest that the two feature spaces do serve new and existing residents.

The two feature spaces are subject to detailed design, but will include trees, shrubs, hedges, benches, pergola, possibly a water feature etc. They will be similar to the existing feature space in Garden Square. The LPA did not request detailed drawings prior to the refusal.

BFL 3. Public Transport - Does the scheme have good access to public transport to help reduce car dependency?

45. There is currently a bus stop on Sycamore drive which is within walking/cycling distance of the development, when exiting the site from the eastern exit. But there is no indication within the application if there is to be public transport links within the development.

There are public transport links very close to the development (the nearest bus stop is on Redwald Road, about 100-200 m to the east). There are no plans for any public transport links within the development.

46. The nearest Train station is Wickham Market Train Station in Campsea Ash, which is approximately 7miles away.

Wickham Market train station is in fact 3.0 miles away. Melton train station is 4.6 miles away.

47. To ensure sustainable travel consideration should be given to providing electric car charging points to encourage sustainable travel choices. Policy SCLP7.2 (Parking Proposals and Standards) of the emerging Local Plan states that this is going to be a requirement of any new development. There is no information in the application if this is to be provided or not. Such provision could be secured by condition.

The SCC Travel Plan Officer recommended this as a condition in the SCC Highways Development Control consultation response of 7 May 2019. The Appellant proposes to have a

minimum of one charging point per building.

48. On this matter it is considered that the proposal is acceptable due to the constraints that already exist within Rendlesham and its access to Public Transport. The Highways department have raised no objection to the application on this matter.

BFL 4. Meeting local housing requirements - Does the development have a mix of housing types and tenures that suit local requirements?

The Strategic Housing Market Assessment for the district identifies the needs for mix and type of housing, and this informs Policy SP3 of the Local Plan which recommends target proportions for house sizes. The development provides a mix of housing types and tenures to suit local requirements:

- Type. 18 detached houses, 8 semi-detached houses, 12 maisonettes, and 37 apartments.
- Size. Floor areas of 37 m2, 47 m2, 55 m2, 59 m2, 84 m2, 90 m2, 98 m2, 122 m2, 124 m2, 125 m2, 150 m2, 154 m2, and 233 m2.
- Number of bedrooms. 14 x one-bedroom, 27 x two-bedroom, 20 x three-bedroom, and 14 x four-plus- bedroom properties.
- Tenure. 26 freehold properties, 37 share of freehold, and 12 affordable rented.
- Price range from £143,000 to £602,000.

The development provides properties for people on lower incomes. There are 25 affordable housing units, consisting of 13 discounted market sales units sold at 20 below local market value, and 12 affordable rented units rented at 20 pct below local market rents.

The different types and tenures are spatially integrated to create a cohesive community. There is no differentiation between the open market and affordable housing units.

49. The housing mix and affordable dwellings have been outlined above, it has concluded that this is not acceptable as the detail has not been provided to the Local Planning Authority, even when it was raised in a previous refusal reason and at pre-application stage.

The key information was provided to the LPA in the Economic Viability Assessment, the Planning Statement, and the draft Section 106 agreement. The LPA did not request any further information prior to refusal.

50. There is a concern in regards of the size of the dwellings and the mix of properties that this will create through the streetscene. The BFL12 states that "avoiding creating too many larger or too many smaller homes from being grouped together.". This development will create a development of large detached properties, which is discussed further in the character section.

The development has 37 buildings consisting of 75 dwellings ranging from one-bedroom to four-plus bedroom properties. The larger or smaller homes are not grouped together, they are well interspersed.

BFL 5. Character - Does the scheme create a place with a locally inspired or otherwise

distinctive character?

The scheme is an extension of the existing development on Garden Square and Gardenia Close and creates continuity with the building designs, site layout, and external materials (brick, render, clay roof tiles) of the existing development. Both developments are in a Suffolk vernacular style and draw on local distinctive characteristics such as pargetting (decorative plasterwork). There is particular attention to landscaping and boundary treatments; a variety of density, built form and appearance (9 different building designs); and different surface materials for the roads (tarmac, tarmac/gravel, and permeable clay pavers).

51. The proposal site would have a wide variety of character, as there are nine styles of dwellings. The external appearance of the properties is considered to be of a high quality and provide detailing and proportions that extenuate this. The properties are to provide large dwellings and flats with a large living areas and internal rooms within them, which are serviced by large windows. It is considered that individually the external appearance of the buildings and their internal layouts are acceptable. However the holistic design approach in terms of the site layout, orientation and position of the dwellings is not acceptable as detailed below.

The LPA finds *the external appearance of the buildings and their internal layouts to be acceptable, but not the site layout, orientation and position of the dwellings*. This is important in defining the area of disagreement.

52. All of the properties are proposed to face east, therefore any northern, southern and western boundary adjoining a road appear to be an afterthought in the layout and would be bounded by a 1m or 2m high fence and/or hedge to enclose the amenity space associated. Out of the 37 plots (there is no plot 13), the frontages of plots 1, 2, 3, 18, 19 and 35 will only be the frontages or the sides of properties that can be seen. The front and side elevation of the remaining plots when facing a public highway would be screened away, therefore any character that is produced through this development will be hidden from view and not creating an inclusive and active frontage. This contrasts with the approach to the existing adjacent Garden Square development, which is based on the same architectural principles, but where the entrance to the site comes in from the east and therefore the majority of the dwellings are approached onto their frontage (i.e. they provide an active frontage to the road).

Most of the buildings have a 1 m low fence to the road or driveway at the front or east, and a 2 m fence to the sides and rear for privacy. This is standard practice in residential development. However

There are some important exceptions, and this shows that the boundary treatments are not an afterthought:

- Plot 15 has a low fence on all four sides. This creates an openness to the feature garden.
- Plots 29 and 25 have low fences to the south, and Plots 11 and 7 have low fences to the north. This creates an openness to the piazza area in the middle.
- Plots 20, 21, 14 and 12 have low fences on all four sides.

Frontages ... that can be seen. The frontages of all 37 buildings can be seen from the roads and

driveways at the front. The LPA singles out buildings on plots that face onto a minor access road or a shared surface road, and seems to dismiss the other buildings that face onto shared driveways. There is no justification for this.

In addition the east-west central road has 4 buildings with north entrances facing onto it - Plots 37, 3, 7 and 11. It also has an open piazza-like arrangement of 4 Buildings in the middle (Plots 7, 11, 25, 29).

It is true that the other buildings along the east-west central road and southern road are 'side on', but this affects the angle of visual engagement, it does not remove all visual engagement. The buildings with south elevations facing onto the road have good visual engagement (Plots 21, 25, 29, 31, 36 and Plots 12, 8, 4, 1).

The character of the scheme is rich and distinctive. It is not screened away or hidden from view. The frontages are inclusive and active. The CGI streetscene that was submitted with the application shows this.

53. The submitted Design and Access Statement explains that the reason for all the dwellings facing east, is to enable the penetration of light through the property in the morning. However, the case officer has undertaken discussions with the applicant through the pre-applications and made recommendations about turning some of the properties, so they are accessed from the west but with the same internal room layout to the dwellings, but this has been disregarded in this application. There has been given no justification or reasons given for such a fundamental design influence on the orientation of the dwellings and its significant effect on the overall layout.

The Design and Access Statement explains that the development draws on principles of architecture known as Maharishi Vastu which promote the health and well-being of the occupants of buildings. The key principles are right direction, right placement of rooms, right proportion, and the use of natural and non-toxic materials. The orientation of a building has an important effect on the quality of life of its occupants. The sun's energy is most nourishing when it is rising. East-facing buildings bring the greatest benefits to the health and well-being of their occupants. The design seeks to maximise the many recognized benefits of natural light for the mental and physical health of the occupants.

Interestingly the district and county councils are very much aware of the sun and orientation. The logo mark of East Suffolk Council is drawn from the eastward point of a compass. The flag of Suffolk County Council has an image of the rising sun.

The LPA have been aware of these architectural principles for 15 years. They are embedded in the layout of Garden Square and Gardenia Close, for which planning permission was granted in October 2004. The existing buildings face east. The Appellant referred to and explained these architectural principles in the pre-application of November 2017, the full application of June 2018, the second pre-application of November 2018, and the second full application of April 2019.

At the meeting on 12 June 2019 the LPA suggested moving the front entrance from the east to the west of the building but retaining the same room internal layout. This would mean the

buildings face west. The front entrance is the front elevation of the building, and this determines the direction in which the building faces.

54. There are nine styles of dwellings, two of them are bungalows and the rest from the site layout would appear as detached dwellings that are two stories in height with additional rooms in the roof space, allowing for accommodation over three stories. However, because of the way that they are designed some of the dwellings would actually be semi-detached properties (House type Glenham, but the second front door is on the north flank elevation). The Maisonettes design is called Bealings, the secondary entrance is also to the north flank elevation of the host dwelling.

55. Apartments are proposed in the building types Wilby and Sudbury, these would only have one entrance door, and externally would look like large detached dwellings.

56. There is a mix of dwelling sizes, but this mix is hidden, within the proposed building forms and orientations, therefore giving no variation in the streetscene of the properties. They would be a mix of design and scale, but on the face value would appear to be an estate of large detached properties, therefore giving insufficient variation in the streetscene, which is not considered to be acceptable.

The LPA accept that there is a mix of styles and sizes, but then attempt to say that the *mix is hidden* and that there is *insufficient variation in the streetscene*. There is simply no basis for this. The Appellant submitted an Overview of the Elevations and Floor Plans and a CGI of a streetscene (Planning Statement, Appendix 5) which show a rich variety in the streetscene.

There are 9 different designs: Easton, Woodbridge, Framlingham, Deben, Bramfield, Glenham, Bealings, Wilby, Sudbury. There are also two designs for single and double garages.

The designs are varied. Some are Georgian, but with variations. There are 3, 5, or 7 bays of windows, one has a pediment, some have a hipped roof, others a pitched roof, etc. The Framlingham is in a Suffolk cottage style. The Bramfield is in a contemporary style.

There are 6 different building types: detached houses, bungalows, semi-detached houses, maisonettes, apartments, and garages.

The buildings vary in size and height. Eaves heights vary from 2.58 m to 7.50 m. Ridge heights vary from 4.32 m to 10.80 m. Footprints vary from 5.70 m x 4.74 m to 14.82 m x 14.82 m.

The external materials are varied. Some buildings are in brick, some in render (of different colours), others in brick and render combined. There are also different surface materials for roads and parking spaces, and a strong attention to soft landscaping.

All these factors create a vibrant and varied streetscene, with a rich and visible mix of buildings.

57. The variety and mix of dwellings was raised by the LPA during the first application (DC/18/2374/FUL). Within the current application two bungalows have been introduced, which have been given the names of 'Deben' and 'Bramfield'. The latter bungalow is of a

contemporary design, which is out of character with the rest of the proposed properties. It doesn't appear to be a statement or landmark property given its prominent position as it has been placed side on. Out of the 75 dwellings there are to be only 2 bungalows, this does not create an adequate mix of properties and any variety to the site.

Out of 37 buildings two are bungalows. One is in a contemporary design and this adds variety to the overall scheme.

58. As detailed above the housing mix is hidden and the layout is not varied enough there will be no features through the site to be able to guide someone around it. There are no landmark buildings or landscape features along the few footpaths or many roads.

There are many landmarks and features. As you come along the east-west central road from east to west:

- There are two Wilbys on either side of the road on Plots 35 and 34.
- Two Glemhams on Plots 31 and 3.
- 4 Bealings on Plots 7, 11, 29, and 25 with a piazza in the middle.
- Two Sudburys on Plots 14 and 21 with gardens in the middle.
- A feature space of formal gardens on the extreme west.

As you come south at Plot 34 from the east-west road:

- There is a view to two Bealings on Plot 15 and 1-2 Peace Palace Gardens (already existing).
- A feature space of formal gardens in between.

As you come north and west from Tidy Road:

- There are two Wilbys on the west on Plots 18 and 19.
- A feature space of formal gardens in the middle on the west.
- The gardens between Plots 14 and 21 on the east.

59. Therefore, despite the quality of some of the architectural design of individual buildings, the development on the whole would create a bland development based around the architectural style and the developers principles of building orientation, with all of the properties facing east, rather than well laid out development with poor and little character.

The Overview of the Elevations and Floor Plans and the streetscene CGI show a varied development with distinctive character.

BFL 6. Working with the site and its context - Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and microclimates?

The appeal site has been a cultivated field for many decades. There are no landscape features, wildlife habitats or existing buildings on the site. However there is a belt of trees and

woodland on the north and west (outside the site boundary), and some existing trees on the east and south (within the site boundary). The Appellant submitted an Arboricultural Report with the planning application which provides a survey of the existing trees on the site and recommendations for their protection during construction.

60. This site benefits of being a green field site, as it has only a few elements that are to be considered when it is being design and developed, but it appears that the applicant has not considered all of the relevant factors in this design.

61. There is an area made available for the cordon sanitaire as an Anglian Water waste water treatment is located next to the north east corner of the site. However, the play area has been located within this cordon sanitaire, away from natural surveillance and within an area that has potential odour and noise impacts. There is a concern that this area may not be used to its full potential or used for anti-social behaviour, due its detachment from the proposed dwellings and natural surveillance.

The play area has good natural surveillance, ref reply to paragraph 43, and the Odour Assessments of May 2018 and September 2019 find that there is no evidence of any odour nuisance, ref reply to paragraph 38.

62. The proposed houses would be situated away from the water treatment plant to the north of the site to reduce any potential negative impacts of the site is to be discussed below, in regards of the impact on neighbouring amenity.

In their email of 15 December 2017 Anglian Water recommended a cordon sanitaire with a 110 m radius from the centre point of the Water Recycling Centre, or 70 m from the site boundary. The Appellant has followed this recommendation, ref Nett Developable Area Plan, Planning Statement, Appendix 4, Enclosure 5.

63. All of the properties are of an external appearance and internal layout that is similar to that of the roads leading off of Garden square, but due to the cordon sanitaire all of the properties are nearer to the properties accessed from Tidy Road. The existing properties in Tidy Road do not appear to have influenced the external appearance or layout of the proposed scheme. All of the existing properties within Tidy Road face their access road, and have a mixture of forms and layouts. Whereas the proposed properties do not, as detailed above.

During the second pre-application the Appellant explained that the overall intention is for the proposed development to be an extension of the existing development on Garden Square and Gardenia Close, ref Planning Statement, paragraph 3.42. The proposed development continues the building designs and the site layout of the existing development. There are some similarities with the building designs on Tidy Road and Mayhew Road, but not with the overall layout. Many residents and visitors find the layout of Tidy Road and Mayhew Road to be rather random and chaotic.

64. It is considered that the main entrance into the site, due to the distribution of properties through the overall site will be from Tidy Road, and the un-adopted nature of the other access road. The approach into the site from Tidy Road is not satisfactory, people will be presented with a long expanse of 2m high fencing rather than attractive dwellings with an active street

frontage.

The Appellant believes the main entrance into the site will be from Garden Square, not from Tidy Road, ref reply to paragraph 34. Although Garden Square is not adopted, it has been built to an adoptable standard and it is intended to have it adopted after the construction programme has been completed.

As one enters the site from Tidy Road, there will be planting on both sides of the road and to the south of Plots 8, 4, and 1. Turning left to the west, the Sudbury on Plot 12 and further on the Wilby on Plot 18 will be visible. These are elegant buildings and the plots have low 1 m fences. Turning right to the east, the upper floors of Plots 4 and 1 will be visible, and further on the two Bealings on Plot 15 and 1-2 Peace Palace Gardens (existing) and the formal gardens in the feature space.

65. There needs to be a focal point at the end of the main spine road to catch the eye as you approach down the road (east to west) as you approach the site from the Garden Square entrance. Despite this being a Full application there is no detail at this stage about the 'feature space' and such a concept should have been a leading influence of the urban design of the site. This is the same for the second feature space indicated next to plot 15, which would be a feature when traveling north to south towards the Tidy Road entrance.

There is a focal point of formal gardens (with woodlands behind) at the end of the east-west road. The Site Landscaping Plan provides an initial overview of the design of the greenspace. It would be unusual to submit detailed designs of the two feature spaces at the submission stage. The LPA did not ask for more detail prior to refusal. The existing formal gardens in Garden Square should reassure the LPA that these will be well laid out. As residents the Appellant's team have a strong motivation to make the best use of the two feature spaces.

66. The finer detail of the site has not been provided considering this is a full planning application, which includes the SUD's features how are these to work in the landscape and the context of the site. Overall the layout plan is poor in demonstrating how the site will be designed.

The Site Layout Plan and the Site Landscaping Plan show 5 swales which will be grassed over. These are the only SuDS features which would be visible above ground. These are also shown in the Addendum to the Flood Risk Assessment, ref Figure 09A, page 5.

BFL 7. Creating well defined streets and spaces - Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well?

The site layout is an extension of the site layout on Garden Square and Gardenia Close. It is based on a grid, and this creates a well-ordered and well-defined pattern of buildings, streets, and spaces. There is a strong attention to soft landscaping. There are no elevations with blank walls. There are 8 rows of buildings. All the fronts of buildings face onto a street in front. Usually this is a shared driveway.

67. The BLF12 guidance refers to creating streets that are principally defined by the position of

the building rather than the route of the carriageway. Due to the desire for the front doors to all the properties face east the layout is very restricted. Each house ends up facing onto a shared driveway with cars parked directly in front of properties, creating a car dominated environment. There is a limited number of actual 'streets' with only plots 1,2,3, 18 and 19, out of the 37 plots, facing onto a main/through/spine road, the rest face onto a cul-de-sac, even when they do face a road. The dwellings are set well back behind parking and front gardens. The street frontage, along the main road, will therefore become hedging and boundary treatments. As previously mentioned, this contrasts with the approach to the adjacent Garden Square development based on the same architectural principles where the entrance to the site comes in from the east and therefore all dwellings are approached onto their frontage.

... creating a car-dominated environment. All the buildings have the convenience of easy access to and from a car in front, and this is important for the elderly, mothers with young children, and people carrying shopping. The parking spaces will not all be the same. Some will be cellular paving and gravel and others cellular paving and grass, ref Access and Parking Plan. There will be soft landscaping in between spaces and on the sides of the streets. This will not be a car-dominated environment.

... a limited number of actual 'streets'. The LPA seem to suggest that the shared driveways are not actual 'streets' and only the east-west road, the southern loop road, and the shared surface road next to Plots 18 and 19 are actual 'streets'. There is no basis for this.

35 of the 37 buildings face onto a street. The 5 buildings on Plots 1, 2, 3, 18, and 19 face onto a minor access road or shared surface road. 30 buildings face onto a shared driveway, and of these 4 buildings have dual entrances (Glemham, Bealings), so they face onto a minor access road or shared surface road to the north and a shared driveway to the east. The buildings on Plots 15 and 38 have a shared driveway to the rear.

The Appellant believes that the main access into the site will be from Garden Square in the east, and therefore all the buildings will be viewed and approached onto their frontage.

68. None of these buildings would turn corners as requested in the BLF12 guidance, there are windows situated on flank boundaries, these are secondary windows (in some instances) but would be obscured on the ground floor by 2m high fences.

There are 9 building designs and none of them have an elevation with blank walls. When turning corners in a street, two elevations of the same building come into view. All the elevations are attractive. The LPA have accepted that *... individually the external appearance of the buildings ... are acceptable*, ref paragraph 51.

... obscured on the ground floor by 2 m high fences. At every turning or corner there are 1 m low fences as well as 2 m high fences. For example:

- At the turning between Plots 34 and 3, Plot 3 has a 1 m low fence.
- At the turning between Plots 1, 32, and 15, Plots 1 and 15 have low 1 m fences.
- At the turning between Plots 12 and 18, both plots have low 1 m fences.

69. As there is no distinction between the different dwellings and the roads there is no pattern

of road type, leading from one area to the other, users would either on the main spine road and loop road or on a cul-de-sac leading to dwellings. There is no mixture or distinction and hierarchy through the site.

There is a clearly defined hierarchy of roads and different surface materials to distinguish them:

- Minor access roads in tarmac.
- Shared surface roads in tarmac and gravel.
- Shared driveways in permeable clay pavers.

In addition the raised platform junctions on the minor access road will be in concrete pavers.

... no distinction between the different dwellings. There are 9 different building designs, 6 building types, and a wide variety of sizes and building materials.

70. The guidance states that the following should be avoided "Over reliance on in front of plot parking that tends to create over wide streets dominated by parked cars and driveways unless there is sufficient space to use strong and extensive landscaping to compensate the lack of built form enclosure." This is exactly what has been provided on the site for car parking for all of the properties.

There is the convenience of parking in front of the plots, without the disadvantages of streets which are too wide or dominated by parked cars. This is because the shared driveways serve one row of houses on one side, and not two rows on both sides.

BFL 8. Easy to find your way around - Is the scheme designed to make it easy to find your way around?

The scheme has a grid layout and this makes it very easy to find one's way around. There are marker features created by the grouping of buildings and by the public spaces. There are views to the feature spaces to the west and south, and to the woodlands on the north and west. The streets are well defined. There is a hierarchy of streets with different surface materials.

71. There are very few landmarks through the site, there are no key buildings or features. The only features are the green spaces at the north east, west of the site, adjacent to plot 15 and the flats (2 storeys) plots 12, 14, 21 and 20.

There are many landmarks created by the grouping of buildings, notably:

- The two Wilbys on Plots 35 and 34.
- The two Glemhams on Plots 31 and 3.
- The 4 Bealings on Plots 7, 11, 25, and 29 with a piazza in the middle.
- The 4 Sudburys on Plots 12, 14, 21, and 20.
- The two Wilbys on Plots 18 and 19.
- The two Bealings on Plots 15 and 1-2 Peace Palace gardens (existing).

There are features not only of the formal gardens to the west and south, but also the open space between Plots 14 and 21, the play area, and the large public space to the north-east.

72. Plots 18 and 19 will view the rear elevations of plots 12, 14, 21 and 20, but not their front views. Plot 15 and 17 will only view the smaller feature space adjacent to plot 15. No properties are looking over the main feature space to the west. Only 30, 31 and 35 will overlook the play space and the main feature space to the north east corner of the site.

Plots 18 and 19 will have views of woodlands to the north and west, and the feature space in the middle. Plots 15 and 17 will have views of the feature space in front, and trees to the south. Plots 12, 14, 21, 20, 18, and 19 will have views of the feature space on the west, and woodlands to the north and west. Plots 38, 37, 34, 35, 31, 30, and 26 will have views of the play area and the public open space to the north-east, and woodlands to the north.

73. The following plots will have no view of any of the feature spaces considered above. Plots 1-12, (there is not a plot 13) Plot 14, plots 16, plots 20-29 and Plots 32-38.

This is incorrect. Plots 12, 14, 21 and 20 will have views of the feature space on the west. Plots 1 and 32 will have views of the feature space on the south. Plots 38, 37, 34, and 35 will have views to the play area and public open space to the north-east.

74. As previously mentioned the key view into the site from Tidy Road has not been taken advantage of, this should be the gateway to the site with buildings directly addressing this approach instead of the side elevations and high fences proposed. It would appear that the feature space on the west end of the site is built or made use of, this would only be appreciated when traversing from garden square towards the west of the site.

The Appellant does not believe that Tidy Road is *the key view into the site* or that it should be *the gateway to the site*, ref reply to paragraph 34. The feature space to the west of the site can be fully appreciated by travelling north and west from Tidy Road, as well as east along the east-west road.

75. The development is a series of uniformed cul-de-sacs rather than a connected network of streets and spaces, which does not make it easy to locate which cul-de-sac a visitor would be on.

The grouping of buildings, the feature spaces, and the woodlands make it very easy to find one's way around. The shared driveways are not uniform. There are obvious differences according to the grouping of buildings, eg the two Wilbys on Plots 34 and 35; the two Glemhams on Plots 3 and 31; the 4 Bealings on Plots 7, 11, 25, and 29; and the two Sudburys on Plots 14 and 21.

76. Other elements that have not been considered are shared surfaces, which can be difficult for people with visual impairments. Out of the 37 plots only 15 dwellings will be accessible from a foot path/pavement, all of the other plots can only be accessed by road and therefore primarily through the use of a car. This is not an easy way to find your way around if you are made to be dependent on shared surfaces and a resident is visually impaired.

... all of the other plots can only be accessed by road. All 37 dwellings can be accessed on foot either from a pavement, a shared surface road, or a shared driveway.

BFL 9. Streets for all - Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?

The streets are pedestrian friendly, and are designed to encourage motorists to drive more slowly and carefully. There are pavements on both sides of the east-west minor access road. There are 5 raised platform junctions on the minor access road obliging motorists to slow down. The shared surface roads and shared driveways are in different surface materials, reminding motorists these are shared with pedestrians. The shared surface roads and shared driveways are designed as social spaces for children to play safely and for neighbours to converse.

77. There is no objection to the proposal from the County Council Highways Officers in regards of the speed through the site, however as only 15 plots out of the 37 proposed in this application are only accessible by both car and footpath. The rest of the properties are to be accessible by only car, or a shared path, but is not considered to be wide enough to accommodate both a car and pedestrians on the site access road for the amount of properties that these roads are to serve. This arrangement is not acceptable.

All 37 buildings are easily accessible both by car and on foot. Shared surface roads and shared driveways are by definition shared by pedestrians and vehicles. The shared surface roads are 5.5 m wide, the shared driveways are 4.1 m wide. The road widths are as specified in the Suffolk Design Guide. SCC Highways Development Control have not raised any objections on this point.

78. It is considered that the main entrance into the site, due to the distribution of properties through the overall site would be from Tidy Road (south east corner of the site). For the properties on the western side of the development to access the greenspace and the play area, the residents will need to walk along the shared spaces road to access the foot paths then to access the green spaces or the rest of Rendlesham and the community facilities within it.

The Appellant does not believe that Tidy Road will be *the main entrance into the site*, ref reply to paragraph 34. Residents in the properties on the west of the site can access the play area and public open space by walking along the shared surface road up to Plots 31 and 3 when it becomes a minor access road and then on the pavement, or along the pavement on the southern section of the minor access road. There is no problem with this.

79. The natural surveillance through the site is very poor, comments have been received from the Designing Out Crime Officer on this application. They have significant concerns in regards of the lack of natural surveillance, the location of public areas in relation to private spaces and the amount of blind spots throughout the site, the boundary treatments around the properties and their relationships to one another. These comments and concerns were raised through the original application as a refusal reason and the two pre-applications and have not been addressed through this new application. This unconventional layout and specific arrangement of properties does give rise to greater risk of perceived and potentially actual crime issues than

a typical residential layout.

In their consultation response for the first planning application of June 2018, Suffolk Constabulary did raise some concerns with the earlier site layout. The Appellants sought to address these in good faith. The site layout of the second planning application in April 2019 is substantially different. In their consultation response for the second planning application of April 2019, Suffolk Constabulary acknowledge that a number of positive changes have been made to the site layout that will reduce the risk of crime, eg visitors' parking, the play area, the feature space next to Plot 15, and parking. Suffolk Constabulary raise some new concerns, but these are minor.

Above all these concerns are hypothetical. There is no evidence to suggest that the proposed layout is inherently unsafe. The proposed layout follows the existing layout on Garden Square and Gardenia Close, which has a very low incidence of crime. During 2010 to 2018 there were 262 recorded offences in Rendlesham and only 4 of these occurred on Garden Square and Gardenia Close, ref Planning Statement, Appendix 2. As a proportion of the number of dwellings, the crime rate on Garden Square and Gardenia Close was lower than it was for the rest of Rendlesham.

It is incorrect to suggest that there is a *lack of natural surveillance* and that there are blind spots. This is an obvious advantage of a grid layout compared to a more random layout.

80. As already stated above there is no active streetscene that is going to be provided through this application, this development will be creating a bland development with little character, due to the orientation of the properties and the proposed boundary treatments impacting upon the streetscene. Therefore creating a poorly designed development.

The Appellant believes that there is an active streetscene, that the development has a rich and distinctive character, and that there is a good mix of styles and sizes of buildings, ref replies to paragraphs 40, 52, and 56.

BFL 10. Car parking - Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?

There is sufficient parking for residents and visitors. The Access and Parking Plan shows a schedule of the number of car parking spaces according to the number of bedrooms per property. The numbers follow the Suffolk Guidance for Parking 2015. There are 165 parking spaces serving 75 units, and these consist of 150 spaces for residents and 15 for visitors.

The parking is positioned close to people's homes, typically in front of their homes on a shared driveway. There are no parking courtyards. There is one single garage and 5 double garages. They are well positioned, and do not dominate the street scene.

81. The car parking provided on the site meets the Suffolk County Council Highways parking standards, but this is a dominating feature along the cul-de-sacs. There is no mix of parking provision through the site, there are only 6 garages for 6 of the plots, with the remainder being off road in plot parking. This is either to the front of the properties or to the rear of the properties. The streets are not wide enough to accommodate on street parking.

... a dominating feature. Typically the shared driveways serve one row of houses on one side of the street, not two rows on both sides, so the car parking is not a dominating feature. The car parking spaces are in two treatments (cellular paving and gravel, cellular paving and grass), and they are interspersed with soft landscaping.

... no mix of parking provision ... There are 150 spaces for residents. 75 of these are the main parking spaces in cellular paving and gravel. 64 are additional spaces in cellular paving and grass. There is one parking space in a single garage, and 10 in 5 double garages. e in one single garage. There are 15 parking spaces for visitors, and these are in cellular paving and grass. There is a good mix of parking provision.

The streets are not wide enough ... The shared surface roads are 5.5 m wide and the shared driveways are 4.1 m wide, as recommended in the Suffolk Design Guide. The parking spaces have the correct widths and depths, ref Site Plan Detail in Planning Statement, paragraph 6.31, page 37.

82. There is no parking down the flank of the properties it is all to the front of the dwellings, this is not a good design feature of the site, as the streets would be vehicle parking dominated, which is detrimental to visual amenity

83. The BFL12 guidance states that the following should be avoided "Over reliance on in front of plot parking that tends to create over wide streets dominated by parked cars and driveways unless there is sufficient space to use strong and extensive landscaping to compensate the lack of built form enclosure." This is exactly what has been provided on the site for car parking for all of the properties.

Most of the buildings have parking in the front, near to the front door. This gives ease of access especially for the elderly, mothers with young children, people carrying shopping etc. The Appellant considers this to be a good design feature.

The streets are not dominated by parking. They are the correct width, neither too narrow, nor too wide, ref reply to paragraph 81.

BFL 11. Public and private spaces - Will public and private spaces be clearly defined and designed to be attractive, well managed and safe?

There are several public spaces: the feature spaces to the west and south, the play area, the public open space to the north-east. They are well-defined in that the private spaces have 1 m or 2 m fences whereas the public spaces are open. The public spaces have good natural surveillance from neighbouring properties.

There is a play area next to Plots 35, 31, and 30.

The public spaces will be maintained by an estate management company funded by residents in the same way as the they are in the existing development on Garden Square and Gardenia Close, ref Planning Statement paragraph 7.5, heads of terms for planning obligations.

84. In between the properties, along the site of roads and pockets through the site are areas of green space, there is no indication of who is going to maintain these areas, it is also unclear where the private and public area starts and finishes. This uncertainty does not assist in the confidence that this site is going to be well maintained for the whole life of the development.

... no indication of who is going to maintain these areas ... During the second pre-application the Appellant explained that the green space in the existing development on Garden Square and Gardenia Close was well maintained by an estate management company, ref Planning Statement paragraph 3.53. Residents pay an estate rent charge to this company. Similarly the public open space in the proposed development will be maintained by an estate management company. Residents have a strong interest in keeping these areas tidy and attractive.

... unclear where the private and public area starts and finishes ... This is shown on the Site Layout Plan and the Access and Parking Plan. The LPA did not request any further information prior to refusal.

85. The green spaces that are provided are not well overlooked. There are left over green space's by plots 14 and 21, and there is no indication of what this is going to be used for, or how it would be maintained.

... not well overlooked ... All the green spaces have good natural surveillance:

- The play area has good natural surveillance from Plots 38, 37, 35, 31 and 30, and indirectly from Plots 34, 3, 7, 29, 28, 27 and 26.
- The formal gardens to the west have good natural surveillance from Plots 18, 19, 14, and 21 and indirectly from Plots 12 and 20.
- The formal gardens to the south have good natural surveillance from Plots 15, 17, 4, 1, 32 and 1-2 Peace Palace Gardens (existing).
- The public open space to the north-east has good natural surveillance from 38, 37, 34, 35, 31, 30 and 26; also from 23, 24, and 25 Garden Square to the south (existing); and also from 15, 16, 17, and 18 Jays Croft Road to the east (existing).

... leftover green spaces ... The area between Plots 14 and 21 has deliberately been left open to complement the formal gardens to the west. This is already shown indicatively on the Site Layout Plan and the Landscaping Plan. The LPA did not request any further information prior to refusal.

86. The play space area to the north east of the site does not show which age group this is going to be for and what is going to be located in there. Broad details relating to this information would have been expected with the submission of the application, with the final detail to be submitted to the Local Planning Authority as a condition.

The scheme provides a play area next to Plots 35, 31, and 30, which will be equipped and maintained. It is intended to be made available for children's use and a separate section for older people, as recommended by paragraphs 3.175 and 3.176 of the existing Local Plan. This is similar to the existing play area in Jubilee Park in the village. The LPA did not request any further information prior to refusal.

BFL 12. External storage and amenity space - Is there adequate external storage space for bins and recycling as well as vehicles and cycles?

There is adequate external storage for bins and recycling. All the 37 buildings have external storage space in the garden by the side of the building for bins and recycling. There are 16 bin collection points. There are 6 cycle stores. They are convenient and secure. These are shown on the Site Layout Plan and the Access and Parking Plan.

87. It is not clear who is going to use the bin storage that is located through the site, in some instances this is located to the rear of a boundary fence that is the boundary of a very small residential garden. It has also not been made clear if the bins are going to be collected by the waste collection lorries, and/or where this is going to be collected from, as there are no presentation areas identified.

The Site Layout Plan and the Access and Parking Plan show the 16 bin collection areas but not the bin storage areas. The bin storage areas will be similar to those in the existing development on Garden Square and Gardenia Close, and are typically to the side of the building, within 10 m of the front or side entrance. The LPA did not request any further information prior to refusal.

There are 16 bin collection/presentation areas and these are clearly identified, and are readily accessible by waste collection lorries.

88. The bike storage is remote from the flats (especially plot 14 and 21) and is not well overlooked, this would make it inconvenient to use and create concerns for users in terms of security. The rear amenity space on some of the plots is limited in depth and there are no garages or shed, therefore there would be no outside storage places for bikes and other items on many of the dwellings.

There are 6 cycle stores serving the 9 blocks of apartments on Plots 34/35 combined, 32, 12/14 combined, 21/20 combined, 18, and 19. They are not remote. 4 cycle stores are within 15 m from the front entrances of the buildings they serve, two are within 30 m (the cycle stores for Plots 12 and 14, and 21 and 20, have been combined).

All 6 cycle stores have good natural surveillance. For example the cycle store on Plot 12 has good natural surveillance from Plots 10, 9, 8, 12, and 14. The cycle store on Plot 20 has good natural surveillance from Plots 22, 23, 24, 21, and 20.

... no outside storage places for bikes and other items ... The cycle stores are shown for the 9 blocks of apartments but not for the other 28 buildings. The cycle stores for the other buildings will be similar to those in the existing development on Garden Square and Gardenia Close, and are typically to the side of the building, within 10 m of the front or side entrance. The LPA did not request any further information prior to refusal.

89. When reviewing the proposal against the Building for Life 12 (2015) guidance it comes out with the following score

Green - 1

Amber - 4

Red - 8

The only green element is public transport, however, though this relies on secured publicly accessible footway connections being delivered, all other elements are considered to be red or amber.

This is a heavily biased assessment, there are numerous errors, and every paragraph has been rebutted.

The key members of the Appellant's team are residents. They have lived and worked in Rendlesham for 10-15 years each. They have a thorough first-hand knowledge of the site and its surroundings.

The Appellant has worked on the site layout for four years. It has gone through more than 30 revisions. In particular the Appellant made every effort to address the concerns raised by the LPA in the refusal of the first planning application in September 2018.

90. The guidance states that developments should aim to secure as many greens (detailed can be found in the guidance) as possible, minimise ambers and avoid reds. A red light gives a warning that a particular aspect of the development needs to be reconsidered. A development needs to secure 9 'greens' to be 'Built for Life' accredited. This development falls well short of the standards set out in BFL12 and this paragraph of the NPPF 129 states that we should have regard to this outcome. Whilst BFL12 is only currently referenced in emerging policy is a well acknowledged tool for applying consideration to comprehensive urban and community design principles and this assessment is therefore of value in the determination of this application.

BFL is indeed a useful framework but the LPA have used it in an entirely inappropriate way:

- The LPA have not used it as a discussion tool to explore ideas and issues.
- They have not used it at the start of the planning process (November 2017) but have introduced it at the very end (June 2019).
- They have used it in isolation as an assessment tool after the second planning application had been submitted.
- They have not used it throughout the planning process, and yet are attempting to use it as a justification for refusal.

NPPF paragraph 38 of NPPF reads: *Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.*

The LPA have not approached this application *in a positive and creative way*, nor have they worked *proactively* with the Appellant.

91. The NPPF paragraph 130 states that "Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and

quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents".

92. The test in this paragraph is quite high stating that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

NPPF paragraph 130 has only been partially quoted. It goes on to say: *Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.*

The proposed development is an extension of the existing, successful development on Garden Square and Gardenia Close, which is generally admired by residents and visitors to Rendlesham. It is described positively in Appendix N of the Rendlesham Neighbourhood Plan which divides the village into 8 residential neighbourhoods.

The design of the proposed development does accord with local plan policies as did the previous neighbouring development at Garden Square and Gardenia Close, as demonstrated in detail in Section 6 of the Planning Statement, ref paragraphs 6.1 to 6.113, and the LPA should not use design as a reason to object to development.

93. The Rendlesham Neighbourhood Plan refers to objective 3a) (Type and Design) states that there is to be a healthy mix in the type and design of the house that is built. Housing should have a sustainable mix as identified in Appendix N of the Rendlesham Neighbourhood Plan.

There is a healthy mix in the type and design of properties:

- Type. There are 18 detached houses, 8 semi-detached houses, 12 maisonettes, and 37 apartments.
- Design. There are 9 different designs – Easton, Woodbridge, Framlingham, Deben, Bramfield, Glemham, Bealings, Wilby, Sudbury.
- Size. There are floor areas of 37 m², 47 m², 55 m², 59 m², 84 m², 90 m², 98 m², 122 m², 124 m², 125 m², 150 m², 154 m², and 233 m².
- Number of bedrooms. There are 14 x one-bedroom, 27 x two-bedroom, 20 x three-bedroom, and 14 x four-plus- bedroom properties.
- Tenure. There are 26 freehold properties, 37 share of freehold, and 12 affordable rented.
- Price. The prices range from £143,000 to £602,000.
- Affordable housing. There are 13 discounted market sales units and 12 affordable rented units.
- First-time buyers. There are 13 DMS units available for sale at 80 pct of the open market value.
- Homes for the less mobile. There are two bungalows (Deben, Bramfield), 6 ground floor maisonettes (Bealings), 14 ground floor apartments (Wilby, Sudbury), and 10 first floor and second floor apartments with a lift (Sudbury).

94. Rendlesham Neighbourhood Plan 3c) (Street Scene) refers to the streetscene as being an

important part of the development.

The streetscene is rich and varied, ref CGI in the Planning Statement. In their consultation response of 16 May 2019 the Rendlesham Parish Council write: *The street scene meets the RNP criteria in providing the ideal street scene.*

95. Objective 4 (Allotments, Orchards and Growing Places) and Policy RNPP3 both show that there is a deficient of allotments within the village. This application does not make a provision for an allotment within the site, nor is there an indication in the supporting information that a provision will be provided for this through the development of the site.

The application provides 4 acres of community orchards and public open space on the north-east. It is important to note that neighbourhood plan policy RNPP3 expresses no preference between the provision of allotments, growing spaces or orchards and therefore providing orchards complies with it.

96. As stated above the proposal does not have a healthy mix of properties, nor an attractive streetscene. Therefore the proposal is not considered to be in conformity with the Rendlesham Neighbourhood Plan Policies, also a provision of allotments is not proposed, nor a justification of why this should not be provided on the site.

97. Policy DM21 of the core strategy ensures that there is a high quality development provided, if the development comprises of poor visual design and layout, or otherwise seriously detract from the character of their surroundings it will not be permitted. Any new development will be expected to establish a strong sense of place, using streetscenes and buildings to create attractive and comfortable places to live and visit. This development is considered to fail on all of these points. Therefore the proposal is not considered to be in conformity with Policy DM21 of the Core Strategy.

Policy DM21 deals with aesthetics and design generally. Here it is the site layout that is in dispute, not design generally. In paragraph 51 above the LPA have conceded that *individually the external appearance of the buildings and their internal layouts are acceptable ...*

The LPA finds issue with *the site layout, orientation, and position of the dwellings*. However if one analyses each point one by one, there is simply no basis for this negative assertion. The design of the proposed development does meet the criteria in Policy DM21. It does establish a strong sense of place, and it does use *streetscenes and buildings to create attractive and comfortable places to live, work, and visit*. The existing development on Garden Square and Gardenia Close gives testimony to this.

98. Paragraph 127 of the NPPF seeks to ensure that the function and overall quality of the area is not just for the short term but over the lifetime of the development. The development should be visually attractive and a result of good architecture, layout and appropriate and effective landscaping. The dwellings should be sympathetic to local character and history, including the surrounding built environment, establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit, create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for

existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

...function and quality... the neighbouring development, to which this is an extension of, functions well, has lower crime levels than other parts of Rendlesham and has a very high overall quality.

...sympathetic to local character...the dwellings, by echoing the approved development next door, are sympathetic to local character.

...a strong sense of place... it would be irrational to think the development does not establish a strong sense of place – this is recognized in Appendix O of the neighbourhood plan.

...high standard of amenity...the proposals have a far higher standard of amenity than many other new developments elsewhere in Rendlesham – something recognised by the Parish Council in their consultation response and in their neighbourhood plan.

...crime and quality of life...the facts show that crime levels in the adjacent Garden Square and Gardenia Close are lower than the rest of Rendlesham.

99. As detailed above this has not been achieved, but has been brought to the attention of the developer at both of the pre-application stages and in the previous refusal of the application on the site. The proposal does not meet the requirements of the NPPF in regards of design, crime and overall function of the site.

100. All of the properties face east, and they have small gardens and large dominating boundary treatments. There is no justification within the supporting information of this application to demonstrate why this layout of development is required or such dominant personal design principles are necessary. When asking the applicant why the dwellings are to face east the response is that if they are to face west you will be turning your back to the sun when entering a property, allowing them to face east ensures that you face the sun when entering or leaving a property. This is not considered to be a material planning reason to justify the proposed layout and its effect on the quality of the layout is significantly detrimental.

... small gardens ... This is addressed in the replies to paragraphs 108 and 109 below.

... large dominating boundary treatments ... This is addressed in the replies to paragraphs 110 to 113 below.

... no justification within the supporting information ... why this layout is required ... This has been addressed in the reply to paragraph 53 above.

101. There are already 50 dwellings that have built in this style and nature to the south east of the site though in that development a more cohesive approach between building and estate layout design was adopted. There is no material justification or information put forward as to why this needs to be duplicated in this location, and/or why a similar layout to that scheme with a less linear road layout could not be adopted on the current application site. A previous

refusal reason in application DC/18/2374/FUL was because of the concern that this development would not be aimed at the open market. The same concern remains with this application as no clear justification has been provided for the unusual layout.

... no material justification ... why this needs to be duplicated ... The proposed development is an extension of the existing development on Garden Square and Gardenia Close, and the site layout follows the site layout of the existing development and also of the Redwald Estate. This is explained in some detail in the Planning Statement, ref paragraphs 5.4 to 5.21.

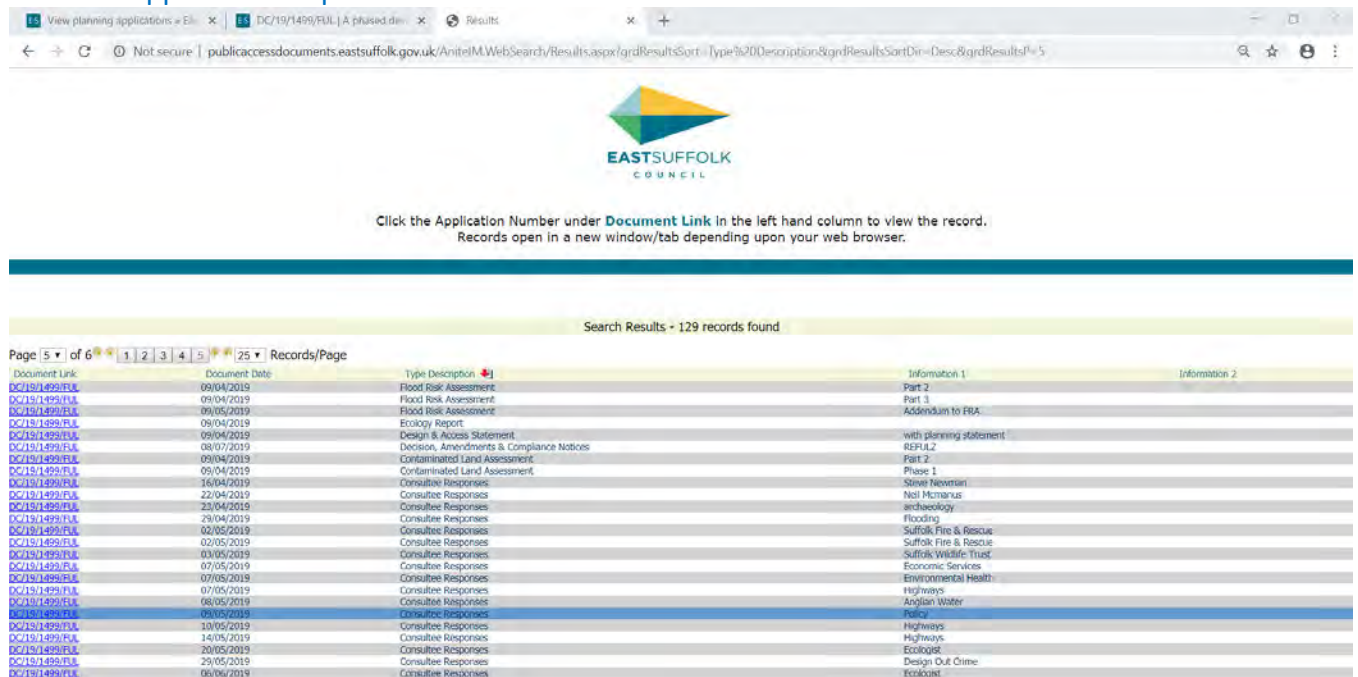
... would not be aimed at the open market. This is hearsay and it was rebutted in paragraphs 3.15 to 3.23 of the Planning Statement. The development is aimed at the open market.

102. The 5th bullet point of Policy SSP12 of the Site Allocations and Area Specific Policies refers to the need to have a design, layout, mix and type of housing proposed is compatible with the housing and transport objectives set out in the 'made' Rendlesham Neighbourhood Plan, this refers to Objective 3a of the Rendlesham Neighbourhood Plan. As there is no affordable housing mix and the plots have not been specified within the application, as stated above it is considered that this is not acceptable in regards of the Rendlesham Neighbourhood Plan and Policy SSP12 of the Site Allocations Document.

This is repeated, ref reply to paragraph 93 above.

103. In summary it is considered that the development is not in accordance with the NPPF and the Core Strategy. There has been an objection raised to the application from the East Suffolk Design and Conservation Officer.

The appellant has never seen it. The officer's report states 'no reply received'. Neither does it does not appear on the public access website. Here is evidence:



The screenshot shows a web browser window with the URL publicaccessdocuments.eastsuffolk.gov.uk/AntrilM/WebSearch/Results.aspx?gridResultsSort=Type%20Description&gridResultsSortDir=Desc&gridResultsP=5. The page displays the East Suffolk Council logo and a message: "Click the Application Number under Document Link in the left hand column to view the record. Records open in a new window/tab depending upon your web browser." Below this, a table titled "Search Results - 129 records found" is shown. The table has four columns: "Document Link", "Document Date", "Type/Description", and "Information 1". The "Document Link" column contains application numbers like DC/18/1499/FUL. The "Document Date" column shows dates from 09/04/2019 to 06/06/2019. The "Type/Description" column lists various planning documents such as Flood Risk Assessment, Ecology Report, Design & Access Statement, Decision, Amendments & Compliance Notices, Contaminated Land Assessment, Consultee Responses, and Design Out Crime. The "Information 1" column lists various services and departments like Part 2, Part 3, Addendum to FBA, with planning statement, REFUL2, Part 2, Phase 1, Street Newmarket, Not McManus, archaeology, Flooding, Suffolk Fire & Rescue, Suffolk Wildlife Trust, Economic Services, Environmental Health, Highways, Anglian Water, Police, Highways, Highways, Ecology, Design Out Crime, and Ecologist.

Document Link	Document Date	Type/Description	Information 1
DC/18/1499/FUL	09/04/2019	Flood Risk Assessment	Part 2
DC/18/1499/FUL	09/04/2019	Flood Risk Assessment	Part 3
DC/18/1499/FUL	09/04/2019	Flood Risk Assessment	Addendum to FBA
DC/18/1499/FUL	09/04/2019	Ecology Report	with planning statement
DC/18/1499/FUL	08/07/2019	Design & Access Statement	REFUL2
DC/18/1499/FUL	08/07/2019	Decision, Amendments & Compliance Notices	Part 2
DC/18/1499/FUL	09/04/2019	Contaminated Land Assessment	Phase 1
DC/18/1499/FUL	16/04/2019	Consultee Responses	Street Newmarket
DC/18/1499/FUL	22/04/2019	Consultee Responses	Not McManus
DC/18/1499/FUL	23/04/2019	Consultee Responses	archaeology
DC/18/1499/FUL	29/04/2019	Consultee Responses	Flooding
DC/18/1499/FUL	02/05/2019	Consultee Responses	Suffolk Fire & Rescue
DC/18/1499/FUL	02/05/2019	Consultee Responses	Suffolk Fire & Rescue
DC/18/1499/FUL	03/05/2019	Consultee Responses	Suffolk Wildlife Trust
DC/18/1499/FUL	07/05/2019	Consultee Responses	Economic Services
DC/18/1499/FUL	07/05/2019	Consultee Responses	Environmental Health
DC/18/1499/FUL	07/05/2019	Consultee Responses	Highways
DC/18/1499/FUL	08/05/2019	Consultee Responses	Anglian Water
DC/18/1499/FUL	09/05/2019	Consultee Responses	Police
DC/18/1499/FUL	10/05/2019	Consultee Responses	Highways
DC/18/1499/FUL	14/05/2019	Consultee Responses	Highways
DC/18/1499/FUL	20/05/2019	Consultee Responses	Ecology
DC/18/1499/FUL	29/05/2019	Consultee Responses	Design Out Crime
DC/18/1499/FUL	06/06/2019	Consultee Responses	Ecologist

104. Local and National Polices both require a development to create a socially inclusive

development through a well designed and safe built environment. Therefore the application is being recommended for refusal on the matter of design and function, also the development not being for the open market and therefore not socially inclusive.

This is repeated, ref replies to paragraphs 29 to 92 (design and function) and reply to paragraph 101 (open market).

However an important point is raised here by the LPA. In the refusal notice the development is claimed to not be inclusive but it is not explained why that is. This makes clear that it is simply the fact of whether the homes would be available to the open market. That being satisfied the LPA will need to concede that the proposed development is socially inclusive.

Impact on Residential amenity

105. The layout of the site is proposed in a grid formation, with the front elevations of the properties facing east and the gardens to the west. The majority of the properties are two storeys in height, with additional accommodation in the roof and windows on all elevations and rooflights. Only two of the properties on the site are proposed to be bungalows. Surrounding the properties are proposed either 2m or 1m fences, this is mixed through the site, there is a detailed plan showing all of these.

35 of the 37 buildings are three storeys in height. The third storey is not full height but it is a storey in the normal use of the word. Floor areas under the eaves with a headroom of less than 1.5 m are excluded from the calculation of gross internal area.

106. As detailed above there are a variety of housing types through the site and because of this there are a variety of windows and height of properties.

107. The main concerns are the lack of private amenity space, overlooking and overshadowing between properties. These concerns were raised through both of the pre-applications and the first application. One of the refusal reasons of the previous application was on this matter.

The LPA raised some concerns in September 2018 in the refusal of the first application, ref DC/18/2374/FUL. The Appellant addressed these concerns in the second pre-application of November 2018 and substantially revised the scheme and the site layout. The LPA appeared to accept these revisions and did not repeat these concerns in their final pre-application advice of 26 February 2019, ref Planning Statement, Appendix 1f.

Section 3.0 of the Planning Statement gives the Appellant's replies to the reasons for refusal of the first application, and shows where the Appellant has found common ground with the LPA in the second pre-application. Paragraphs 3.57 to 3.85 directly relate to the previous concerns with residential amenity.

Despite this discussion during the second pre-application, the LPA have now resurrected these concerns in paragraphs 105 to 135 of this Delegated Report.

108. Out of the 37 plots that would contain the 75 dwellings, there are proposed to be 16 plots with a rear garden depth that would be less than 5m. Of these 16 plots, 9 of the plots would

contain more than one dwelling on the site (e.g. flats and maisonettes), which includes up to 5 flats. One of the plots (Plot 15) has a 1m deep garden onto a 1m high fence. The plots that contain a single dwellings have three bedrooms and above, which is not creating a garden space that would be adequate for the amount of bedrooms within the properties.

There are 37 plots with buildings as follows:

- 16 detached houses.
- 4 pairs of semi-detached houses.
- 2 bungalows.
- 6 buildings with 2 maisonettes each.
- 4 buildings with 3 apartments each.
- 5 buildings with 5 apartments each.

There is a generous amount of public amenity space: about 4 acres of informal open space and community orchards to the north-east, a play area, two feature spaces of formal gardens in the west and south, and other areas of green space.

The 37 plots and buildings have plenty of their own private amenity space but in a different arrangement to what the LPA might be used to. This was explained to the LPA during the second pre-application, ref Planning Statement, paragraph 3.44.

Here the LPA are focusing on *rear garden depth*. In much of post-war residential development in Britain, especially in the suburbs, plots tended to be thin rectangles, often dividing up a terrace of houses or a pair of semis, and the buildings were set closer to the front of the plot, which was open to a road and more public, and the rear gardens provided the private amenity space.

In the proposed development the plots are less rectangular, more square, and the buildings are set more to the middle of the plot, rather than to the front. The amenity space is spread more evenly on all four sides. In most cases the house faces a shared driveway, which is more private as it serves only 3 or 4 buildings. The gardens on all four sides provide good amenity space.

Plots 12, 14, 21, 20, and 32 are Sudburys, blocks of 5 apartments, and have plenty of amenity space on all four sides.

Plots 34, 35, 18, and 19 are Wilbys, blocks of 3 apartments, and also have good amenity space on all four sides (Plot 34 would share the amenity space in front of Plot 35).

109. This is not an acceptable standard of living on a green field site that is being designed with few constraints through the site. The amenity space is not acceptable and it would be expected to be larger for the size of the properties and the amount of potential residents within the dwellings. One resolution for this would be to reduce the amount of dwellings on the site to be able to increase the amount of living space.

There is plenty of public and private amenity space. The private amenity space is provided in a different way, on all four sides of the building. The LPA are focussing only on the rear garden

depth.

The nett developable area of the site is 3.2 ha, ref Planning Statement, Appendix 4, Enclosure 5. According to the DCLG the national average density of residential development in 2014-15 was 31 dwellings per ha. This would translate into 99 units. The proposed development of 75 units has a density of only 23 dwellings per ha, well below the national average. A scheme of say 50 units would have a density of only 16 dwellings per ha, about half the national average. This would be an inefficient use of land, contrary to NPPF paragraph 122.

110. Due to the small amenity spaces, in 11 of the plots there will be habitable rooms that look out onto a 2m high flank fence. In some instances this is the only window for this room, or the main window for the room. There is only 1m to 3m between the fences and the flank windows, which are on the north and south flanks of the properties, therefore in some instances blocking out the majority of the sun throughout the day to these habitable spaces.

The Site Layout Plan and the Landscaping Plan show the boundary features. Generally there is a 1 m fence in front to the road or driveway, and a 2 m fence to the sides and rear for privacy. This is standard practice. There are some exceptions:

- Plots 15, 12, 14, 21 and 20 have a 1 m fence on all four sides.
- Plots 29 and 25 have 1 m fences to the south, and Plots 11 and 7 to the north.

Here the LPA are focusing on 2 m fences on the north or south flanks. The flank fences serve a purpose in avoiding neighbours and passers-by looking into people's homes. Inevitably some habitable rooms will look out onto 2 m flank fences. However there are other windows to the east or west, and in no case is the side window that looks out onto the fence the only window for the room.

... in some instances blocking out the majority of the sun throughout the day to these habitable spaces ... Although there are 2 m high fences on the south side of many buildings, there are no instances on the proposed development where the fences are tall enough or close enough to buildings either to block out direct sunlight to ground floor habitable rooms or to block daylight. The Appellant has checked the BRE guidelines, ref BR209 Site Layout Planning for Daylight and Sunlight.

111. The ground floor flat in Plot 15 is going to be completely overlooked. It is surrounded by a 1m high fence on all boundaries, to the east of the site is a pedestrian route through the site and to the west is an access road to Plots 15 and 16. There is 1m to 2m between the dwellings and the fence. This is not acceptable as there would be direct overlooking to the property from the public spaces. Therefore there would be no privacy for the ground floor flat, where all of the rooms are on the ground floor. This is not acceptable and will be directly overlooked.

As explained during the second pre-application (Planning Statement paragraph 3.59), Plot 15 is a special case. It is one of four Bealings that 'frame' the Maharishi Peace Palace. The other three are already built. They are 1-2, 3-4, and 5-6 Peace Palace Gardens. The Bealings on Plot 15 will complete the symmetry. This determines its position.

There are existing trees to the south and west of Plot 15 to reduce overlooking from those

directions. Plot 17 is a Deben bungalow, so there are no first floor or second floor windows that would overlook Plot 15. Plot 16 is a Woodbridge, but it is at an angle to Plot 15.

The three existing Bealings at 1-2, 3-4, and 5-6 Peace Palace Gardens have the same issues as Plot 15, but there have not been any complaints.

112. Plots 12 and 21 would have bedroom 1 and a kitchen on the ground floor that is next to a 1m high fence and a public foot path leading towards the western feature space, these are proposed as the only windows for these habitable rooms.

113. Plots 14 and Plot 20 would have a dining room on the ground floor, which also face a 1m high fence and a public foot path leading towards the western feature space.

Plots 12, 14, 20, and 21 are Sudburys, blocks of 5 apartments. There is a fence in between Plots 12 and 14, and in between Plots 21 and 20, but this is a low 1 m fence, and it is at a distance of 4-5 m from each building.

There are two apartments on the ground floor of the Sudbury: a two-bedroom apartment on the south side and a one-bedroom apartment on the north side. The flank windows are not the only windows to the habitable rooms:

- The two-bedroom apartment on the south side has an open plan kitchen, dining and living room with windows on the east and west as well as on the south.
- The one-bedroom apartment on the north side has a bathroom in the middle with a frosted window on the north; a kitchen and dining room with windows on the west as well as on the north; and a bedroom with a window on the east as well as on the north.

114. There are 17 out of the 37 plots which would not have a dwelling directly to the south of it. As all but two (which are included in the 17) of the dwellings are two storey dwellings and the plots are detached from each other, they are considered to be close enough to each other to cause overshadowing on the 20 plots. Due to the layout of the dwellings on the site if there is a property to the south of the host dwelling there will only be light in the late evening as there is a staggering of the dwellings to overcome some of the overlooking issues. This is not an acceptable amount of overshadowing, on either the rear amenity space or habitable windows.

Overshadowing between flank elevations.

There are 37 buildings in a nett developable area of 3.2 hectares, and inevitably there will be some overshadowing on a building caused by a neighbouring building to the south. This is a familiar problem in residential development, but less so in the proposed development. In many developments the plots tend to be thin rectangles and the buildings closer together side to side, ref reply to paragraph 104. However in the proposed development the plots tend to be more square and the buildings further apart side to side.

Appendix 5 of the Planning Statement shows measurements for the separation distances between flank elevation on the proposed development and compares these with the separation distances between flank elevations in the existing development on Garden Square

and Gardenia Close. The averages are 7 m and 5 m respectively. This is a significant improvement over the existing development.

Any overshadowing will be compensated by other design features which seek to maximise the penetration of sunlight and daylight to main rooms and gardens throughout the day and throughout the year, ref Planning Statement paragraph 5.17:

- Orientation north-south-east-west.
- Shape – the buildings tend to be longer east-west.
- Separation distances east-west and north-south.
- Higher ceilings.
- Internal windows, glazed doors, and roof lanterns.
- Raised ground floors.

115. Due to the close proximity of the properties and their scale, with windows on all elevations of the building there will be overlooking between properties. Which are detailed below, some of the properties are staggered, so there will not be direct overlooking, but it would be close enough to cause concern at the overlooking between properties:

116. Plot 2 and Plot 3 – 7 m separation distance between 3rd bedroom looking into 2nd bedroom on the first floor. The 5th bedroom looks into 3rd bedroom, these are the only main windows into the room, the rest of the windows are rooflights.

Overlooking between flank elevations.

The north elevation of Plot 2 (Woodbridge) will face the south elevation of Plot 3 (Glemham).

However the north elevation of the Woodbridge has narrow 0.5 m windows on the first and second floors. The south elevation of the Glemham has a 0.5 m window on the first floor and a 1 m wide window on the second floor.

In the rooms that face each other, there are other windows and rooflights on the east or west, so the occupants are not reliant on the windows that overlook or are overlooked:

- Bedroom 5 on the second floor of the Woodbridge has a rooflight on the east and a roof lantern.
- Bedroom 3 on the first floor of the Woodbridge has its main 1 m wide window on the east.
- Bedroom 3 on the second floor of the Glemham has two rooflights on the east and west.
- Bedroom 2 on the first floor of the Glemham has its main 1 m wide window to the east.

117. Plot 4 and Plot 5 - 5m separation distance between the properties, bedroom 5 will look into the bathroom on the 2nd floor, otherwise this room just has rooflights.

The north elevation of Plot 4 (Woodbridge) will face the south elevation of Plot 5 (Framlingham). Both the Woodbridge and the Framlingham have narrow 0.5 m windows on the first and second floors on these elevations.

Also, in the rooms that face each other, there are other windows and rooflights on the east or west, so the occupants are not reliant on the windows that overlook or are overlooked:

- Bedroom 5 on the second floor of the Woodbridge has a rooflight on the east and a roof lantern.
- Bedroom 3 on the first floor of the Woodbridge has its main 1 m wide window on the east.
- The room on the second floor of the Framlingham is a bathroom with frosted glass.
- Bedroom 1 on the first floor of the Framlingham has two 1 m wide windows on the east and west.

118. Plot 5 and Plot 6 - 7m separation distance between dwellings, 1st floor plot 5 bedroom 2 will look into bedroom 1 of plot 6. On the 2nd floor there will be looking between bedroom 3 and bedroom 4.

The north elevation of Plot 5 (Framlingham) will face the south elevation of Plot 6 (Woodbridge).

The north elevation of the Framlingham has two narrow 0.5 m windows on the first and second floors. The south elevation of the Woodbridge has a 0.5 m window on the first floor and a half-moon window set at 1.7 m cill height on the second floor.

In the rooms that face each other, there are other windows and rooflights on the east or west:

- Bedroom 3 on the second floor of the Framlingham has a rooflight on the west.
- Bedroom 2 on the first floor of the Framlingham has two 1 m wide windows on the east and west.
- Bedroom 4 on the second floor of the Woodbridge has two rooflights on the east and west.
- Bedroom 1 on the first floor of the Woodbridge has its main 1 m wide window on the west.

119. Plot 6 and Plot 7 - 5m separation distance, the third bedroom will look into the dining room, which are both on their respective 1st floors.

The north elevation of Plot 6 (Woodbridge) will face the south elevation of Plot 7 (Bealings).

The north elevation of the Woodbridge has two 0.5 m windows on the first and second floors. The south elevation of the Bealings has a 1 m window on the first floor and two rooflights on the second floor.

In the rooms that face each other, there are other windows and rooflights on the east or west:

- Bedroom 5 on the second floor of the Woodbridge has a rooflight on the east and a roof lantern.
- Bedroom 3 on the first floor of the Woodbridge has its main 1 m wide window on the

east.

- Bedroom 2 on the second floor of the Bealings has a dormer window to the west and a roof lantern.
- The open plan kitchen/dining/living room on the first floor of the Bealings has two 1 m wide windows on the east and west.

120. Plot 8 and Plot 9 - Plot 8 is a bungalow, which is separated from plot 9 by a 2m high fence. There are windows on the north elevation which are 2m from the ground, which will therefore look straight over the fence into the amenity space on Plot 9. Due to their height, as they are above 1.7m, there would be no direct overlooking but perceived overlooking instead.

The north elevation of Plot 8 (Bramfield) will face the south elevation of Plot 9 (Woodbridge). The Bramfield is a bungalow and is separated from the Woodbridge on Plot 9 by a 2 m high fence.

121. Plot 9 to Plot 10 - there is 5m between the 1st floor bedroom 1 and the 3rd bedroom, on the 2nd floor there will be looking between bedroom 5 and a bathroom on the adjoining plot.

This is the same as Plots 4 and 5, ref paragraph 117 above. The north elevation of Plot 9 (Woodbridge) will face the south elevation of Plot 10 (Framlingham).

122. Plot 23 and Plot 24 - There is 5m separation distance. There will be overlooking between the 2nd floor bedroom 3 and bedroom 4, these are the only windows, otherwise there are just rooflights.

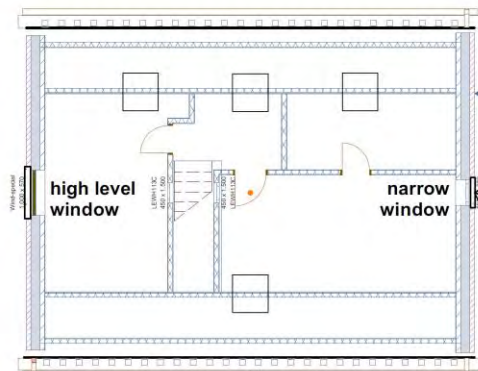
This is the same as Plots 5 and 6 above, ref paragraph 118 above. The north elevation of Plot 24 (Framlingham) will face the south elevation of Plot 23 (Woodbridge).

123. Plot 27 and Plot 28 - There is a 5m separation distance, on the first floor bedroom 1 will look into bedroom 3, on the 2nd floor bedroom 5 will look into a bathroom.

This is the same as Plots 4 and 5 and Plots 9 and 10 above. The north elevation of Plot 28 (Woodbridge) will face the south elevation of Plot 27 (Framlingham).

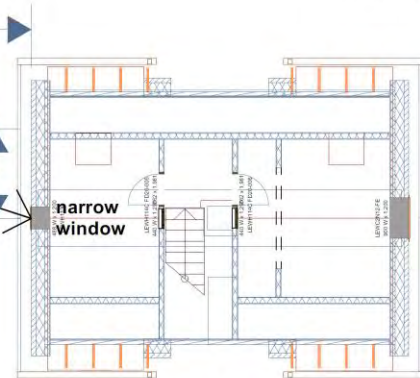
SOUTH

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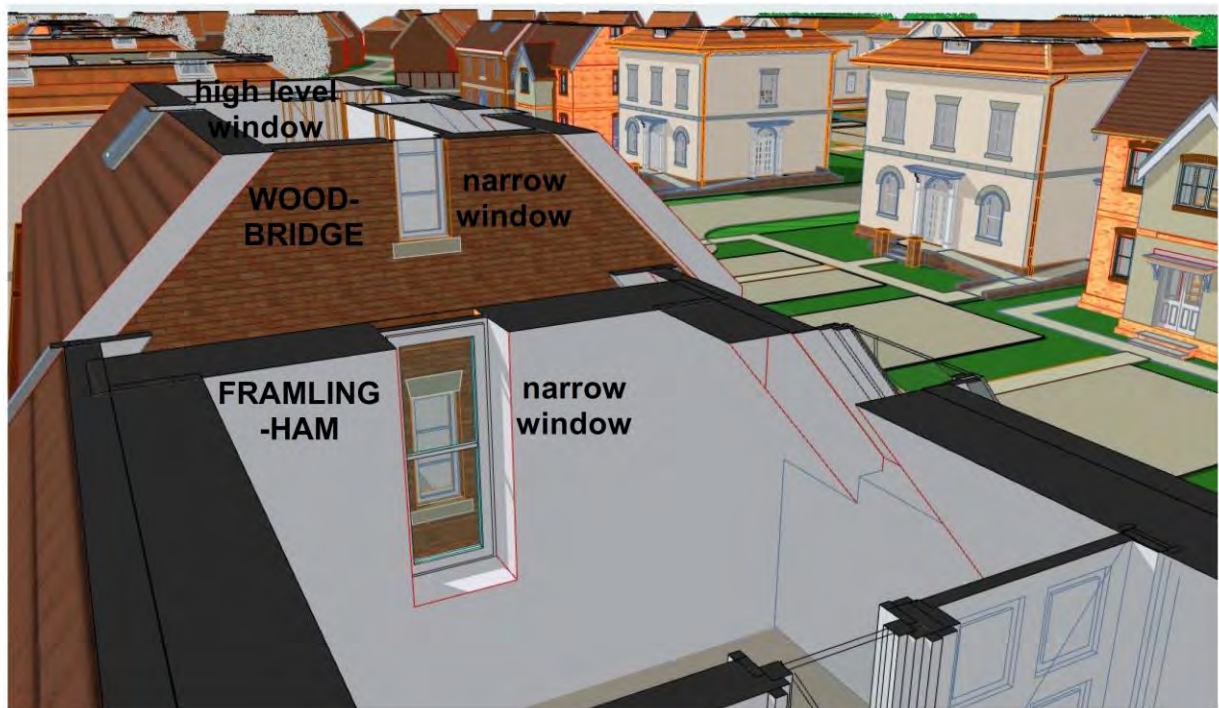


**PLOT 28
WOODBRIDGE
SECOND FLOOR**

NORTH



**PLOT 27
FRAMLINGHAM
SECOND FLOOR**



**Typical view towards South
from a Framlingham house (Plot 27)
onto a flanking Woodbridge house (plot 28)**

IP	20 Oct 19	1:100 A3
Rev ID	Rev	Date
Originator		
Natural Building Design 29 Gardenia Close Rendlesham Suffolk IP12 2GX		
Project		Project Ref
CC DEVELOPMENTS AREA 8 RENDLESHAM		
Layout Title		
PLOTS 27 & 28 OVERLOOKING ON FF & SF		
Drawing Number		Rev
84 / R14 / OL / P		-

124. The Wilby style dwelling is proposed to have a flat on the 3rd floor, which is only served by rooflights and two dormer windows (these do not serve habitable spaces), this is not a positive outlook for the future residents of this dwelling. This type of dwellings is on plots 18, 19, 34 and 35. Which is not acceptable.

The second floor apartment in the Wilby has 5 rooflights and two dormer windows. This is a very positive outlook for future residents.

125. There is a particular concern in regards of plot 15 and the potential overlooking that this is going to cause to 5 Peace Palace Gardens. The separation distance between these two properties would be 15m, from the front elevation of the proposed dwelling to the rear elevation of the current property. Therefore the windows on the front elevation will directly overlook the rear garden amenity space and windows of the neighbouring property.

This is repeated, ref paragraph 111 above. Plot 15 is a special case, as it is one of four Bealings that 'frame' the Maharishi Peace Palace. There are existing trees to the south of Plot 15 to reduce any overlooking onto 5-6 Peace Palace Gardens. The separation distance between Plot 15 and 5-6 Peace Palace Gardens will be exactly the same as that between 1-2 Peace Palace Gardens and 3-4 Peace Palace Gardens (existing).

126. All of the properties within the proposal site are east facing, therefore the front of the dwellings will face into the rear gardens of the properties to the east. There are different heights and styles of building, as they are all (apart from 2 bungalows) three floors in height, the separation distances are at a minimum of 20m. There is a concern of some overlooking from the third storey elements of the buildings into the rear gardens of the neighbouring properties. But this has been an improvement from the previous application and pre-applications.

Overlooking east-west. Appendix 5 of the Planning Statement shows measurements for the separation distances east-west on the proposed development. The average is 24 m.

127. Anglian Water has raised the concern of the odour impact of the Anglian Water Treatment Plant to the north east corner of the plot and wish for a detailed assessment to be carried out. The assessment that has been provided states that there would be no harm to the amenity of the new residents, but this appears to have been modelled on an old site location plan, hence Anglian Water asking for more details.

In their consultation response of 8 May 2019 Anglian Water did not raise these concerns. The LPA may be referring to Anglian Water's representation in January 2019 under the Local Plan review with reference to emerging policy SCLP12.62.

The Appellant submitted an Odour Assessment carried out by Air Spectrum in May 2018 which showed that the odour level concentrations in 4 receptor locations distributed throughout the site were on average about 0.0053 OUe (European odour units) per m³. This is more than 20 times below the threshold of 1.5 OUe per m³ for offensive odours.

The Odour Assessment of May 2018 was not *modelled on an old site location plan*. It was

modelled on 4 receptor locations on the undeveloped field, and presented the predicted dispersion of malodours as a contour map overlaid onto the undeveloped field (page 18). The site layout on page 5 was inserted for information. It was the earlier site layout of the first planning application, but it was not part of the modelling.

Air Spectrum have carried out an updated Odour Assessment in September 2019 which confirms the results of May 2018.

128. East Suffolk Environmental Protection Officers have asked for more detail is required on the noise of the site.

This was never communicated to the appellant by the case officer, nonetheless the Appellant has provided a Noise Assessment by Sharps Redmore.

129. If this application is to be recommended for approval it is recommended that additional work is undertaken to understand the impact on the dwellings as required by Anglian Water and East Suffolk Environmental Protection Officers.

130. Paragraph 127 part f) states:

"create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."

131. Policy DM23 of the Core Strategy ensures that Privacy/overlooking, outlook, access to daylight and sunlight and the resulting physical relationship with other properties are considered when determining a planning application.

The Appellant supports these aims and ideals.

132. This proposal will not create a high standard of amenity for existing and future users of the site due to the lack of amenity space, overlooking and overshadowing. This is due to a poor relationship between the properties on the site, windows being located on the flank elevations, where these are the only windows for habitable rooms, therefore creating overlooking. Poor boundary treatments which will dominate plots and obscure habitable room windows. Small amenity space for the size and scale of the dwellings that are being proposed.

These assertions have been addressed individually and in detail in the paragraphs above, and are rejected.

133. The BFL12 under part 12 (External storage and amenity space) states that "It is a good idea to ensure that rear gardens are at least equal to the ground floor footprint of the dwelling. Triangular shaped gardens rarely offer a practical, usable space. Allow residents the opportunity to access their garden without having to walk through their home.". This is not the case as 37 plots that contain the 75 dwellings, there are 16 plots that have a garden size that is less than 5m from the rear elevation of the dwelling to the 2m high fence to the rear of the property. There are other dwellings on the site which also have a small rear amenity space,

which is less than the floor area of the ground floor.

There is a substantial amount of public amenity space and private amenity space, ref replies to paragraphs 109 and 109. The public amenity space consists of 4 acres of informal open space to the north-east, two feature spaces of formal gardens to the west and south, a play area, etc.

The private amenity space is spread more evenly on all four sides of the buildings in each plot. This is a greenfield site on the edge of a village. The LPA are over-preoccupied with rear gardens as private amenity space.

134. The proposal does not conform with Policy DM23 of the Core Strategy, BFL12 and the NPPF and should be recommended for refusal on this basis.

135. As stated above there will be harm to the amenity of the future and current residents of the site, there will be overlooking, no privacy, reduced access to daylight and sunlight, poor relationship between other properties and poor safety and security. Therefore the proposal is not in conformity with Policy SCLP11.2 of the emerging local plan.

These assertions have been addressed individually and in detail in the paragraphs above, and are rejected.

Highways and Rights of Way

136. Suffolk County Council Highways commented on the application they have stated that the development will not negatively impact upon the surrounding highway network with regard to traffic flows. Further clarification has been provided to state that both of the accesses start on adopted roads, either from Tidy Road or Sycamore Drive as Garden Square is not an adopted road and it is understood that this remains unfinished and un-adopted as a result of a non-payment of an S106 obligation on the Garden Square development.

Garden Square has been built to an adoptable standard, but has not been adopted. Garden Square will be the route for construction traffic during the three years of construction of the proposed development. The Appellant proposes to arrange for the road to be adopted after the construction programme has been completed, ref reply to paragraph 34.

... as a result of ... Garden Square has been built to an adoptable standard, but has not been adopted. This has nothing to do with the alleged non-payment of a Section 106 obligation for an education contribution.

137. There were points raised in the previous application which have been addressed through the application. However, there are some of the roads within the application would not be suitable for adoption by the Local Planning Authority. A section 278 agreement would be required to link the development access road to Tidy Road, where minor dropped kerbs improvements on Tidy Road will also be required. Conditions have been recommended by the Highways Officers. Due to the lack of continuous ownership to that road and the necessity of a public route into the site prior to first occupation, this should be secured through Grampian style condition (if permitted). This would conflict with the indicated approach to phasing in the

Design and Access Statement which oddly suggests that the development would come forward off the Peace Palace site and without a vehicular access route via either of the proposed routes.

... some of the roads ... would not be suitable for adoption. The minor access road will be built to an adoptable standard and would be suitable for adoption. It is not intended to build the shared surface roads or the shared driveways to an adoptable standard.

... lack of continuous ownership ... There is no third party land between the end of Tidy Road and the appeal site. There is a thin wedge of land between the end of Tidy Road and the appeal site, but it is part of the purchase of the appeal site and it is included in the land purchase contract. It has its own Land Registry reference SK375575. The Appellant has confirmed this to the LPA by email on 28 May 2019.

There are two vehicular access routes from Garden Square and from Tidy Road. The Appellant has proposed to use Garden Square for construction traffic, and to build the east-west spine road connecting Garden Square to Tidy Road in Phase 1 of the construction programme.

138. In the previous application the Suffolk County Council Rights of Way Officers comment on the application, they have not commented on this proposal. But it is considered that their recommendations are carried on into this proposal, which are the following. A bridleway is to be created along the track which runs along the eastern side of the site, as this would link the estate to the wider countryside. The Rendlesham estate is currently poorly served in terms of public rights of way and access to the countryside, this link would help to fill that gap for this development and the wider estate. There is no doubt that such a right of way route would benefit the wider community, however funding of a creation agreement/order does not guarantee delivery of such a route, particularly as such a route could be contentious with landowners. The Rights of Way Team have not been clear in the specific location of this route and it is currently unclear as to whether this should be secured as a s106 obligation or funded through CIL.

SCC Public Rights of Way Team made a consultation response for the first application of June 2018 and have repeated these comments for the second application, ref SCC Highways Development Control consultation response of 7 May 2019.

The Appellant has agreed to provide the bridleway link and also to make a financial contribution, ref draft heads of terms in the Planning Statement, paragraph 7.10, and draft Section 106 Agreement.

139. Through the development there are to be limited footpaths creating connections through the site. This proposal will fail to enhance the existing footpaths by reducing the connections through the site. There is no proposal of having a public right of way through the proposal nor additional cycle networks. The proposal is not considered to be in conformity with Policy SCLP 7.1 of the emerging Local Plan, however, there is no objection on the application from Suffolk County Council Highways on the impact from the development to the existing transport network. Therefore there are elements of the application that can be improved.

... limited footpaths creating connections through the site ... The proposed development will create 1.6 km of new pedestrian routes, ref reply to paragraph 39:

- 140 m of pavement along Garden Square.
- 330 m of pavement along the east-west spine road.
- 280 m of shared surface roads.
- 530 m of shared driveways.
- 200 m of footways.
- 120 m of bridleway.

This does not include the footpaths in the public open space to the north-east, the play area, or the two feature spaces to the west and south.

140. The amount of parking is considered to be acceptable in regards of Policy SCLP 7.2 of the remerging Local Plan, but there is no demonstration through the application if there are proposed to be electric charging points provided in each of the properties. Therefore there is some conflict with this policy.

The SCC Travel Plan Officer has already recommended this as a condition, ref SCC Highways Development Control consultation response of 7 May 2019. The proposed development will have 37 electric vehicle charging points, one per building.

Surface Water Drainage

141. Comments have been received from the Suffolk County Council Flooding Officer and the submitted Flood Risk Assessment. It is considered that the proposal is acceptable subject to conditions being applied to the application if it is to be recommended for approval.

142. The proposal is located within Zone 1, therefore there is no identified risk of fluvial or tidal flooding.

143. Anglia Water have provided their comments on the application, they have requested further details are to be provided through a detailed odour risk assessment. This is to establish the range at which the amenity of dwellings is likely to be impaired.

In their consultation response of 8 May 2019 Anglian Water did not raise these concerns. The LPA may be referring to Anglian Water's representation in January 2019 under the Local Plan review with reference to emerging policy SCLP12.62.

The Appellant has submitted an Odour Assessment of May 2018, and an updated Odour Assessment of September 2019. These confirm that the odour level concentrations are more than 20 times below the threshold of 1.5 OUE (European odour units) per m3 for offensive odours.

The Appellant has had discussions with Anglian Water regarding the minimum distance from the Water Recycling Centre for new residential development. In their email of 15 December 2017 Anglian Water have recommended a radius of 110 m from the centre point of the WRC,

or 70 m from the site boundary. The proposed site layout follows this recommendation.

144. There are pipes and other Anglian Water assets that cross the development site, both east to west and north to south. It is stated in the Anglian Water comments that an adoption agreement is to be entered to either move the assets or building over them, but the development should take them into consideration when designing the site.

145. From the layout that has been provided, and the information supplied by Anglian Water, this has not been taken into consideration through the design of the layout of the site as no indication has been made in the application that the required easements have been included through the site or if the pipes are going to be relocated. Nor has an adoption agreement been undertaken at the point of writing this report. Therefore it is not clear if the dwellings can be built in this location and not affect the assets owned by Anglian Water. SCLP12.62 recognises the sewers crossing the site and this alignment of these is clearly set out in Enclosure 5 of the Design and Access Statement. With particular regard to the sewer passing east-west across the site, this is currently below the proposed location of plots 19, 21, 24, 25, 28, 29, 31, 35, 38 which accommodate 20 units. The application suggests the sewer will be relocated but provides no detail on where or how. The relocation of such a length of existing sewer is a significant infrastructure burden on a site of this scale and the ability to undertake this work should be demonstrated as part of the application in order to show that the proposed layout can be achieved. Without this certainty the deliverability must be questioned and it does not comply with Policy SCLP12.62 in that respect.

The Appellant has been aware of the sewers on the site for some years. In October 2016 Anglian Water submitted some plans, but they were indicative. In February 2018 the Appellant arranged for Flowline to undertake a survey of the sewers to pinpoint their precise location. This was submitted as a drawing with the application, and it was reproduced in the Flood Risk Assessment of May 2019, Appendix F. It is also shown in the Nett Developable Area Plan in Appendix 5 of the Planning Statement.

At an early stage it was decided that it will be necessary to divert a section of the sewer under the central east-west road. The Site Layout Plan is based on diverting a section of the sewer, and accommodates the remaining existing sewers and the required easements.

This was explained in the Planning Statement, paragraph 6.53: *The layout has accommodated the sewers at significant expense and includes a proposal to realign them. The necessary survey work has been undertaken to ensure this will be achieved without detriment to the existing sewer system.*

The sewer diversion was also mentioned in the Flood Risk Assessment of May 2018, paragraph 3.2.7: *The site layout will require the diversion of the existing 750 mm diameter public surface water sewer.*

On 28 May 2019 the Appellant's civil engineering consultants submitted a Section 185 diversion application to Anglian Water, ref SD-0037727. However the LPA were not aware of this, as they did not request any further information on the sewer diversion prior to refusal.

The sewer diversion is a significant infrastructure cost but it should be kept in perspective. The

Economic Viability Analysis estimates the total design and build costs of the project to be £12.2 m. It allows £90,000 for the sewer diversion in the list of abnormal costs. This is about 0.7 pct of the total design and build costs.

146. Policy SCLP 9.6 of the Local Plan review refers to the need to have a Sustainable drainage systems for more than 10 dwellings on a site. As there is no objection from the County Council Officers on this matter it is considered that this Policy is conformed with. However, Policy SCLP 9.7 would not have been conformed with as there is no detail to show how the water on the site is to be managed.

Appendix N of the Flood Risk Assessment of May 2018 gives a draft surface water maintenance plan. Section 5.4 of the FRA Addendum of April 2019 to the FRA adds further comments to the maintenance plan.

Habitats Regulations Assessment

*147. The proposal site is located within the 13km zone of influence over the following European Protected sites:
Alde-Ore Estuary SPA/Ramsar
Sandlings SPA
Orfordness-Shingle Street SAC*

148. The development is for 75 new dwellings, therefore it is concluded that there would be likely significant effects on the European Sites through the increase on recreational pressures. Therefore stage 2 "the integrity test" is to be applied to this application.

149. The East Suffolk Ecology Officer has reviewed the application and the supporting information. The supporting information states that there is an adequate space within the site to be able to provide mitigation within the site as the proposed development, in combination with other development proposals for Rendlesham and the District is considered to have a Likely Significant Effect on European sites in the local area.

150. It has been concluded by the East Suffolk Ecology Officer that the land that is proposed within the site the layout includes one area of greenspace in the north-eastern part of the site and another, smaller area, on the western side. However, it has not been demonstrated that residents of the development would have access from the development to a 2.7km circular walking route, either within the site or connected to existing rights of way. In the absence of demonstration that such a route is available there remains the potential that nearby designated sites will be used for regular recreational activities (such as dog walking) which may result in significant adverse effects on such sites. This on-site mitigation is necessary for developments over 50 dwellings within the Zone of Influence in addition to strategic mitigation in the form of a RAMS contribution.

The submitted Habitats Regulations Assessment of March 2019 accepted that mitigation measures are required to prevent adverse effects on European sites, and proposed two such measures: (a) a financial contribution of £321.22 per dwelling, which comes to £24,091.50 in total, and (b) provision of on-site greenspace suitable for daily dog walking and other

recreational activities.

The on-site greenspace is about 5 acres in total and consists of the informal open space and orchards to the north-east, the two feature spaces of formal gardens to the west and south, the play area, the bridleway, and other smaller areas of green space. The list in paragraph 150 is incomplete.

This on-site greenspace will be a substantial and welcome addition to the existing greenspace in Rendlesham.

... it has not been demonstrated that residents of the development would have access from the development to a 2.7 km circular walking route ... The ESC Ecology Officer quotes from a survey of existing users of greenspace surrounding Whitehill and Bordon in Hampshire which showed that 88 pct of daily visitors said dog walking was the primary reason for their visit, and walkers with dogs most frequently undertook a circular dog walk of 2.7 km. Such a provision of greenspace is certainly desirable for all villages and towns, but it is not intended to be a requirement for individual developments. There is no such requirement in the existing or emerging Suffolk Coastal Local Plan.

The greenspace to the north-east could provide circular walks of 500-600 m. Also the proposed bridleway along the eastern site boundary may eventually link to the land to the east, subject to the approval of the adjacent land-owners, and this could open up much longer circular walks

151. The information that has been supplied within the application details that a Mitigation amount will be provided to the Local Planning Authority. The HRA report and Planning Statement quote different figures for the RAMS contribution, the (per dwelling) figure within the HRA report would appear to be correct at £321.22 per dwelling. This would be a total of £24,091.50 for the whole development. A heads of terms has been submitted to the Local Planning Authority as part of this application, but it was submitted at a late stage of the application and in draft from that has not been commented on by Local Planning Authority, therefore the contribution that is to be paid cannot be commented on. A S111 form has not been submitted on this matter.

... different figures ... The correct figure is £321.22 per dwelling as quoted in the Habitats Regulations Assessment and later in the draft Section 106 Agreement.

... it was submitted at a late stage ... The draft heads of terms were submitted at the start of the planning application and the draft Section 106 Agreement was submitted on 12 June 2019. The LPA did not provide any feedback on the draft heads of terms, but despite this the Appellant went ahead and prepared a draft agreement.

... A S111 form has not been submitted ... The funding mechanism for the financial contribution can either be a Section 106 Agreement or a Section 111 Agreement. It cannot be both.

On Site Ecology

152. Local Plan policy DM27 (Biodiversity and Geodiversity) criterion (c) states that all development proposals should incorporate beneficial biodiversity conservation features where appropriate.

153. A Preliminary Ecological Appraisal (PEA) report (BasEcology, March 2018) has been submitted as part of this application. There are mitigation recommendations proposed, but no further surveys are recommended.

154. Comments have been received from East Suffolk Ecology Officers stating that, within the PEA it refers to ecological receptors that can be found on the site at present and details the necessary mitigation /compensation measures that should be implemented through the proposal and the site. However, these mitigation/ compensation measures are not then identified within the plans and proposals for the site, therefore it is unclear how these will be provided or over what time period.

The Preliminary Ecological Appraisal sets out recommendations in Table 4.1 which are predominantly about the timings of things. The requirements of Table 4.1 should be covered by planning condition.

155. From the plans provided it is unclear whether the layout of the development includes external lighting. As recognised in the PEA lighting has the potential to result in an adverse impact on bats and therefore if external lighting is required/proposed an ecologically sensitive lighting strategy should be provided.

The LPA did not request such information prior to refusal. This is a site of 5 hectares with 75 dwellings. The site layout does include external lighting. The Appellant supports Policy DM26 to minimize light pollution. The external lighting on Garden Square and Gardenia Close is from low level bollards.

Trees and Landscaping

156. The proposal site is visually well contained to the north and west by existing woodland and will have no visual connection with the wider rural landscape, and by existing residential development to the east and south. There are no public rights of way in the locality and so any visual impacts will be confined to the existing dwellings to the south and east. Therefore it is considered that there would be no impact on the wider landscape from this proposal, as confirmed by the East Suffolk Landscape Officer.

157. In respect of the landscape strategy plan, there is an allocation of open space, and an acceptable degree of separation from the existing woodland, into which woodland fringe planting is indicated. Subject to final planting details, which would be requested by a condition the indicated landscape layout is acceptable.

158. A tree survey has been submitted which shows that three trees will need to be removed because they obstruct the two access points, as well as various groups of Sycamore trees along the southern site boundary in order to achieve the proposed site layout. It is considered that these removals will not have a significant impact on wider landscape character, although their removal will have a localised effect on the outlook of immediately adjacent properties.

159. There is proposed to be a play area within the development, this will meet Policy SCLP 8.2 of the Local Plan review, but there are no details of the play area and how this is to be used and the age groups that it is to serve. It is also considered that the provision of open space through the development will not serve the whole of the development as it is not completely walkable by all future users of the site.

The play area is intended to be made available for children's use and a separate section for older people, as recommended by paragraphs 3.175 and 3.176 of the existing Local Plan. This is similar to the existing play area in Jubilee Park in the village. The LPA did not request any further information prior to refusal.

The play area site is certainly walkable. It is within a 3 minute walk (200 m maximum) of the 75 new dwellings, and within a 6 minute walk (400 m maximum) of the village centre.

160. The Rendlesham Neighbourhood Plan and SCLP 8.3 of the Local Plan review both refer to the need for allotments, this has not been provided through this application and therefore the proposal is not considered to be compliant.

The application provides 4 acres of community orchards and public open space on the north-east. Policy RNPP3 expresses no preference between the provision of allotments, growing spaces or orchards.

Archaeology

161. Comments have been received from the Suffolk Archaeological Officers on the application. It has been identified that the site lies within an area of archaeological potential recorded on the County Historic Environment Record. Multi-period crop marks (RLM 076) and finds scatters (RLM 050) and the site of Rendlesham Hall (RLM 019) have been located within the vicinity of the proposed development site.

162. There is a high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist. This is due to a survey in 2017 and a trenched evaluation in 2018. The results of this work identified an area of archaeological interest as late Iron Age and Roman remains, possibly indicating settlement activity, were found in the Northern part of the site.

163. It has been stated by the consultee that there would be no grounds to consider refusal of permission, in order to achieve preservation in situ of any important heritage assets. Conditions will need to be applied to the application to ensure that Paragraph 141 in the NPPF is complied with to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

The Appellant submitted a Geophysical Survey Report of November 2017 and an Archaeological Evaluation Report in November 2018. In their consultation response of 23 April 2019 SCC Archaeological Service recommended two conditions: implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation, and

an assessment of the investigation.

Following on from this the Appellant asked SCCAS for guidance as to preparing the Written Scheme of Investigation, and on 17 May 2019 SCCAS issued a Brief for Archaeological Excavation.

Land Contamination

164. Appropriate information has been submitted as part of this application to be able to demonstrate that that contamination will not be an issue on the site. It has been confirmed by the Head of Environmental Protection, that there is no objection to the application subject to a condition if the application is going to recommended for approval.

S106 and CIL

165. CIL contributions will be provided through this development. Any contributions which are collected will provide 25% to Rendlesham Parish Council as a made Neighbourhood Plan is in place.

A CIL Additional Information Form was submitted with the application.

166. A S106 is also going to need to be completed as part of this application or any subsequent appeal to secure the amount and potential phases of payments to the Local Planning Authority and County Council. This was a refusal reason in the previous application, due to the lack of information. A draft document was not included within the submission of the current application to the Local Planning Authority. A draft document was submitted in the final stages of this application. The S106 is not at a stage that can be considered acceptable and therefore the application is still being recommended for refusal on this matter, specifically the inability at this time to secure affordable housing, RAMS contribution, Open Space delivery and management and other matters.

A draft document was submitted in the final stages of this application. The Appellant submitted draft heads of terms for a Section 106 Agreement in the Planning Statement at the start of the application, ref Section 7. The LPA did not give any feedback. Despite this the Appellant submitted a draft Section 106 Agreement on 12 June 2019.

167. Through the Local Plan review Policy SCLP 3.5 identifies the infrastructure that is to be provided and the requirements for each development and how this is to be funded. As this applicant did not provide a S106 in a timely manner to be able to considered by the Local Planning Authority, this proposal is not considered to conform to this policy.

... in a timely manner. The Appellant submitted both draft heads of terms and a draft Section 106 Agreement in a timely manner, but the LPA did not progress them. The LPA acknowledge this in paragraph 24: *The draft s106 is noted but due to the other issues with this application it cannot be progressed further.*

Climate change

168. Policy SCLP 9.2 of the Local Plan review details the measures that are to be met by all new developments of over 10 dwellings. From the information that has been submitted it is considered that the proposal will not meet the details of the Policy and therefore is not in conformity.

The Appellant supports the emerging Policy SCLP9.2 for sustainable construction, and especially the sentence which reads: *Proposals should improve the efficiency of heating, cooling and lighting of buildings by maximizing daylight and passive solar gain through the orientation of buildings.*

The Appellant has already provided a great deal of information on this in the Planning Statement:

- A key principle is the use of natural and non-toxic materials such as brick, clay blocks, clay pantiles and timber (paragraphs 5.12 and 5.15).
- The designs seek to maximize sunlight and daylight through 6 practical measures (paragraph 5.17).
- The designs seek to minimize heat loss from the dwellings through 4 practical measures (paragraph 5.19).
- The designs seek to maximize natural cooling through two practical measures (paragraph 5.20).

The LPA did not request any further information prior to refusal. There is no basis to conclude that the proposal not meet the higher standards of the emerging policy. The Appellant has been working on the technical design (RIBA Plan of Work Stage 4) with architects, M&E consultants, and civil and structural engineers in order to achieve higher energy efficiency standards, water efficiency etc.

Emerging Policy SCLP9.2 requires a 20 pct reduction in CO2 emissions below the Target CO2 Emission Rate (TER) set out in the Building Regulations. The M&E consultants have carried out outline SAP assessments, and have advised that the 20 pct reduction can be achieved by an increase in insulation in the floors and roof space and the addition of solar PV panels.

Planning Balance

169. The application of an NPPF tilted balance is not necessary in this case. However the applicant promotes the proposal on a tilted balance basis and therefore consideration is given to such a balance in the circumstance that it was deemed applicable. Under the circumstance the decision should be made in accordance with Section 38(6) and there are no material reasons to decide otherwise. Due to the very clear and significant harm that has been identified above it is considered that this will not be overcome from the limited benefits to the site from this development.

The application of an NPPF tilted balance is not necessary ... The LPA's principal planning policy on housing supply, Policy SP2, is out of date and consequently in accordance with NPPF paragraph 11 the tilted balance is engaged, ref Planning Statement paragraphs 6.1 to 6.13.

170. Summary of Benefits and Adverse Impacts

The benefits of the scheme have been identified as:

*Economic benefits including both spend in the local economy and job creation in the construction industry, during construction and upon occupation,
Provision of affordable housing (though this is affected by deliverability concerns highlighted in the report),
Very limited weight to CIL contribution to be spend on infrastructure projects, a proportion of which would be directed to the Town Council (15% of receipts), as this is required primarily to mitigate the effects of the development and New Homes Bonus.*

It is inexplicable why “very limited weight” has been attributed to CIL contributions. Not least when the uplift from the erroneously allocated 50 dwellings to 75 dwelling provides significant additional CIL monies to Rendlesham – a village which historically, the Neighbourhood plan explains, has been beset by the under-provision of infrastructure.

Another important point is that the planning officer has assumed only 15% of CIL monies go to the parish council. It is in fact potentially 25% because there is a neighbourhood plan in place. This error by the case officer clearly and fundamentally undermines what little balancing exercise was undertaken by the LPA.

In addition the officer’s report refers to the “Town Council” but Rendlesham is a Parish Council; this implies the use of copied and pasted text from elsewhere, undermining the clarity and authority of the officer’s report.

In addition, the list of benefits is incomplete and misleading. It should be (Planning Statement Section 1.0):

- About £12m in construction activity, which will create direct and indirect income and employment in the district and beyond.
- 75 new homes in Rendlesham.
- 25 new affordable homes in Rendlesham (included in the 75).
- About 5 acres of formal and informal open space, gardens, orchards, play area, etc.
- About £600,000 from the New Homes Bonus.
- About £700,000 in potential Community Infrastructure Levy payments.
- About £175,000 for Rendlesham Parish Council (part of the CIL).
- About £15,000 for a solar-powered real-time bus screen in Rendlesham.
- About £8,000 for a new bridleway.
- About £24,000 financial contribution for RAMS.

171. The adverse impacts of the proposals have been identified as:

The poor design and layout of the development.

The lack of connectivity to the existing wider community, through limited public routes into and through the development, and limited visual cohesion with the adjacent built environment in terms of layout and form,

The creation of locations which would be vulnerable to fear of crime, due to lack of natural surveillance,

The impact on residential amenity, through limited residential amenity spaces for some units

*and direct overlooking to both proposed and existing dwellings,
Insufficient information on the provision of affordable housing,
The impact of odour from the adjacent treatment centre upon the proposed open space and future residents.
Impacts upon the habitats of protected species and impacts upon environmentally designated sites from increased visitor numbers, resulting in likely significant effects.*

These assertions have been addressed individually and in detail in the paragraphs above, and are rejected.

172. The adverse impacts of permitting this development would significantly and demonstrably outweigh the benefits, when assessed against the NPPF taken as a whole.

The Planning Statement examines the benefits and adverse impacts in some detail in Section 6.0 and concludes:

Parker Planning Services are of the opinion that the benefits deriving from this development significantly and demonstrably outweigh any minor or localised impacts, and therefore the balance falls in favour of granting planning permission.

Conclusion

173. The concerns that have been raised on the original application and at pre-application stage have not been overcome. These are in regards of the design and function of the layout of the site, how the dwellings and the street layout are to relate to each other to create a cohesive and safe community. The impact on the amenity of the neighbouring properties, in regards of overlooking with the site, the adequate provision of amenity space. The proposal does not meet the requirements of the NPPF, Rendlesham Neighbourhood Plan, the policies in the Core Strategy, Site Allocations and Area Specific Policies Document and the Building For Life 12 Guidance.

The LPA has raised several concerns. These have been addressed individually and in detail in the paragraphs above, and are rejected.

NPPF paragraph 130 states: ... *Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.*

Similarly the BFL guidance states: *BFL 12 is not designed to be used in isolation as an assessment tool once a planning application has been submitted. If BFL 12 has not been used throughout the planning process we do not support its use as a justification for the refusal of a planning application.*

The LPA have misinterpreted and misapplied NPPF and BFL as well as Local Plan policies.

174. Another reason for refusal that is to be applied to this application is in regards of odour, because of the location of the Cordon Sanitaire and the Anglian Water Treatment Works to the north east of the site. There does not appear to be adequate provision for these facilities and

how the site is going to be impacted upon. Furthermore the ability to deliver the layout and re-route the existing sewer has not been demonstrated, which is a policy requirement.

The Appellant submitted an Odour Assessment of May 2018 which confirms that the odour level concentrations are more than 20 times below the threshold of 1.5 OUe (European odour units) per m³ for offensive odours.

The Appellant has consulted Anglian Water regarding the minimum distance from the Water Recycling Centre for new residential development. Anglian Water recommended a cordon sanitaire of a radius of 110 m from the centre point of the WRC, or 70 m from the site boundary. The proposed site layout follows this recommendation.

The Appellant has been aware of the sewers on the site for some years. In February 2018 the Appellant arranged a survey of the sewers to pinpoint their precise location. At an early stage it was decided that it will be necessary to divert a section of the sewer under the central east-west road. The Site Layout Plan is based on diverting a section of the sewer, and accommodates the remaining existing sewers and the required easements. This was explained in the Planning Statement and in the Flood Risk Assessment.

The Appellant has submitted a Section 185 diversion application to Anglian Water. The LPA were not aware of this, as they did not request any further information on the sewer diversion prior to refusal.

175. As there are material planning concerns on the site as stated above there is a principle objection to the site in regards of the proposed housing numbers, the application is above the 50 dwellings as stated in Policy SSP12 and therefore should be reduced to overcome the material planning concerns and make it more in line with the number of dwellings stated in Policy SSP12.

The LPA has raised several concerns. These have been addressed individually and in detail in the paragraphs above, and are rejected.

The nett developable area is 3.2 hectares. The proposed development of 75 units has a density of 23 dwellings per hectare. This is well below the normal density of residential development. A development of 50 units would have a density of only 16 units per hectare. This is contrary to NPPF paragraph 122 as it would not be an efficient use of land.

176. A draft S106 has been submitted for the proposal. However, due to the late submission of this document and the outstanding issues within it, it is not a signed or agreed s106 and is it therefore still to be refused on this basis.

The Appellant submitted draft heads of terms for a Section 106 Agreement at the start of the application. The LPA did not provide any comment or feedback. Despite this the Appellant submitted a Section 106 Agreement on 12 June 2019. The LPA did not progress this, ref paragraph 24: *The draft s106 is noted but due to the other issues with this application it cannot be progressed further.*

177. The on-site HRA mitigation is not adequate and there is no sure detail of how the

contributions are to be provided. This will therefore result in likely significant effects on European Sites.

The Appellant has agreed to provide off-site mitigation by way of a financial contribution of £321.22 per dwelling or £24,091.50 in total, as per HRA guidelines, and on-site mitigation by way of the provision of on-site greenspace suitable for daily dog walking and other recreational activities. This is about 5 acres and consists of:

- Informal open space and orchards to the north-east.
- Two feature spaces of formal gardens to the west and south.
- A play area.
- A bridleway, eventually linking the appeal site to adjoining land on the east.
- Other smaller areas of green space.

178. Therefore the application is being recommended for refusal due to the overall harm that would be caused from this development, it is considered that there would be no benefit recommending the application for approval on the basis of new dwellings in this sustainable location versus the impact and harm that would be caused on the overall design and function of the site and harm to the amenity of the future residents of this site lack of affordable dwellings, HRA mitigation and no firm detail on the S106. These concerns and refusal reasons have been raised throughout the pre- applications and previous application that has been recommended for refusal. Therefore this application cannot be supported and is being recommended for refusal.

These concerns have been addressed individually and in detail in the paragraphs above, and are rejected.

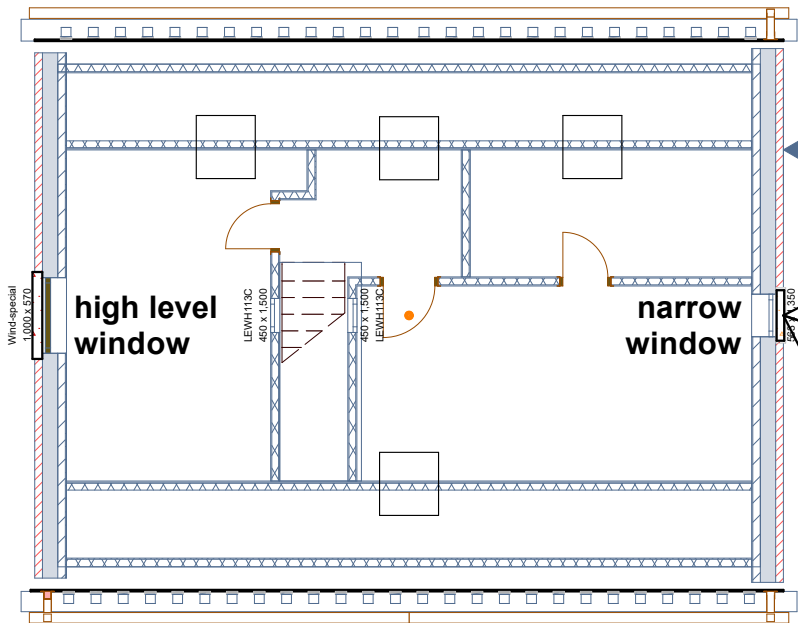
NPPF paragraph 38 states: *Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.*

Regrettably the LPA have not approached this application *in a positive and creative way*, nor have they worked *proactively* with the Appellant.

179. Whilst there have been representations of support from third parties, there have been no representations of support from Rendlesham Parish Council or Statutory Consultees, and therefore the referral process has not been triggered, so the application will be determined at officer level in accordance with the adopted scheme of delegation.

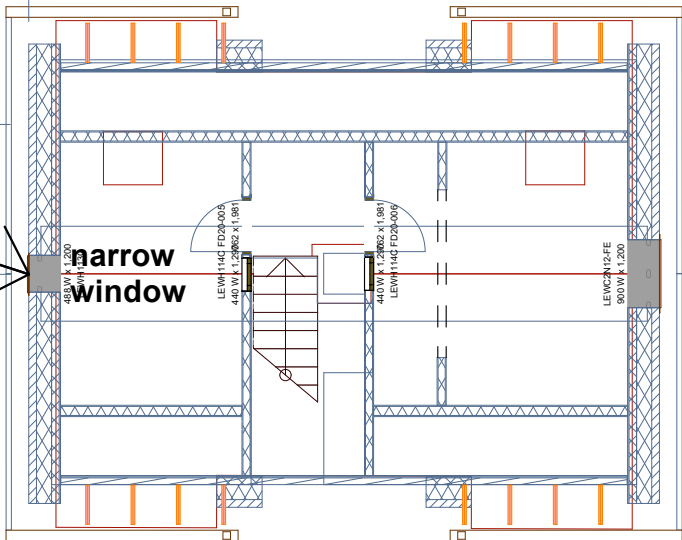
SOUTH

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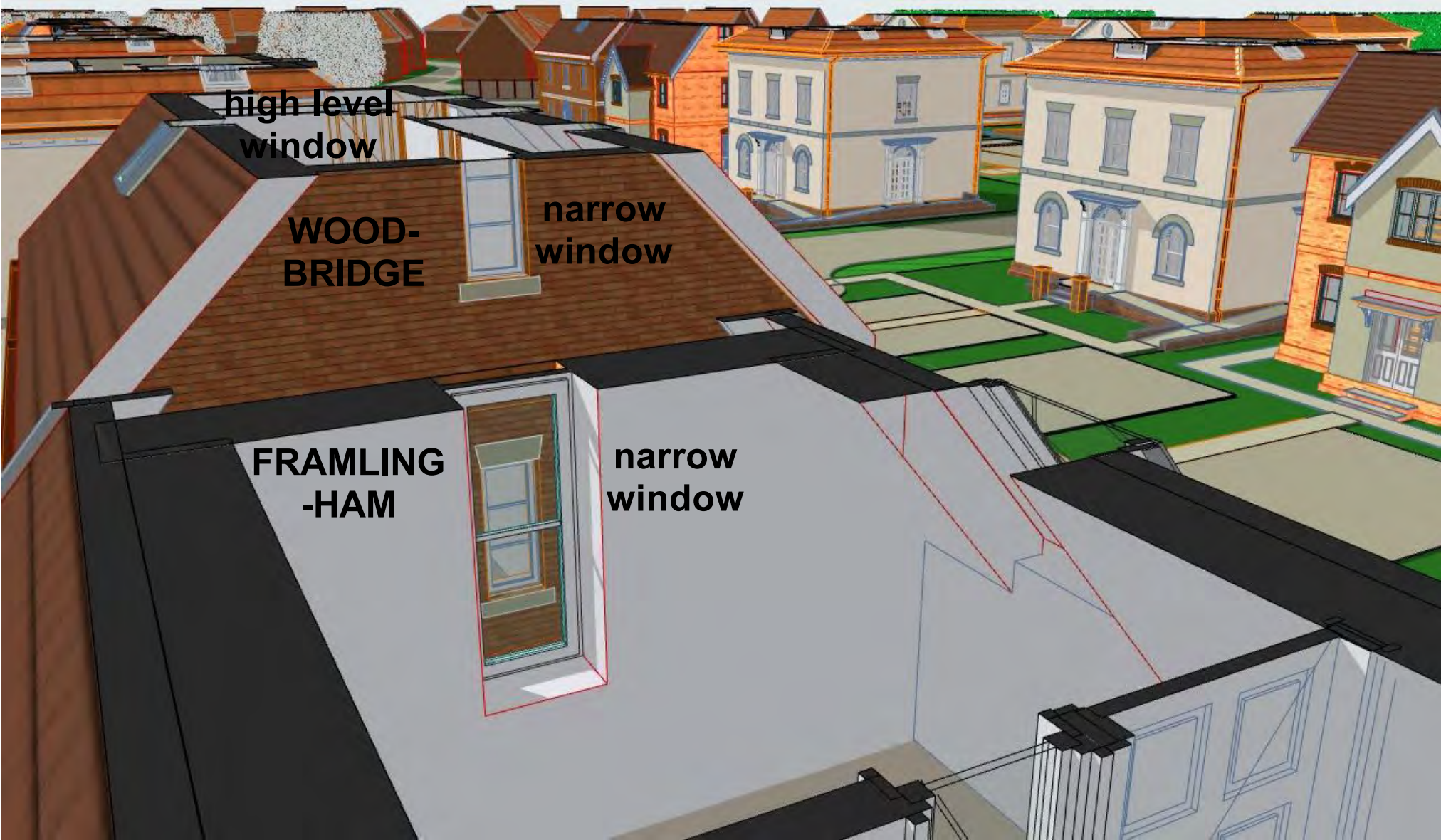


PLOT 28
WOODBIDGE
SECOND FLOOR

NORTH



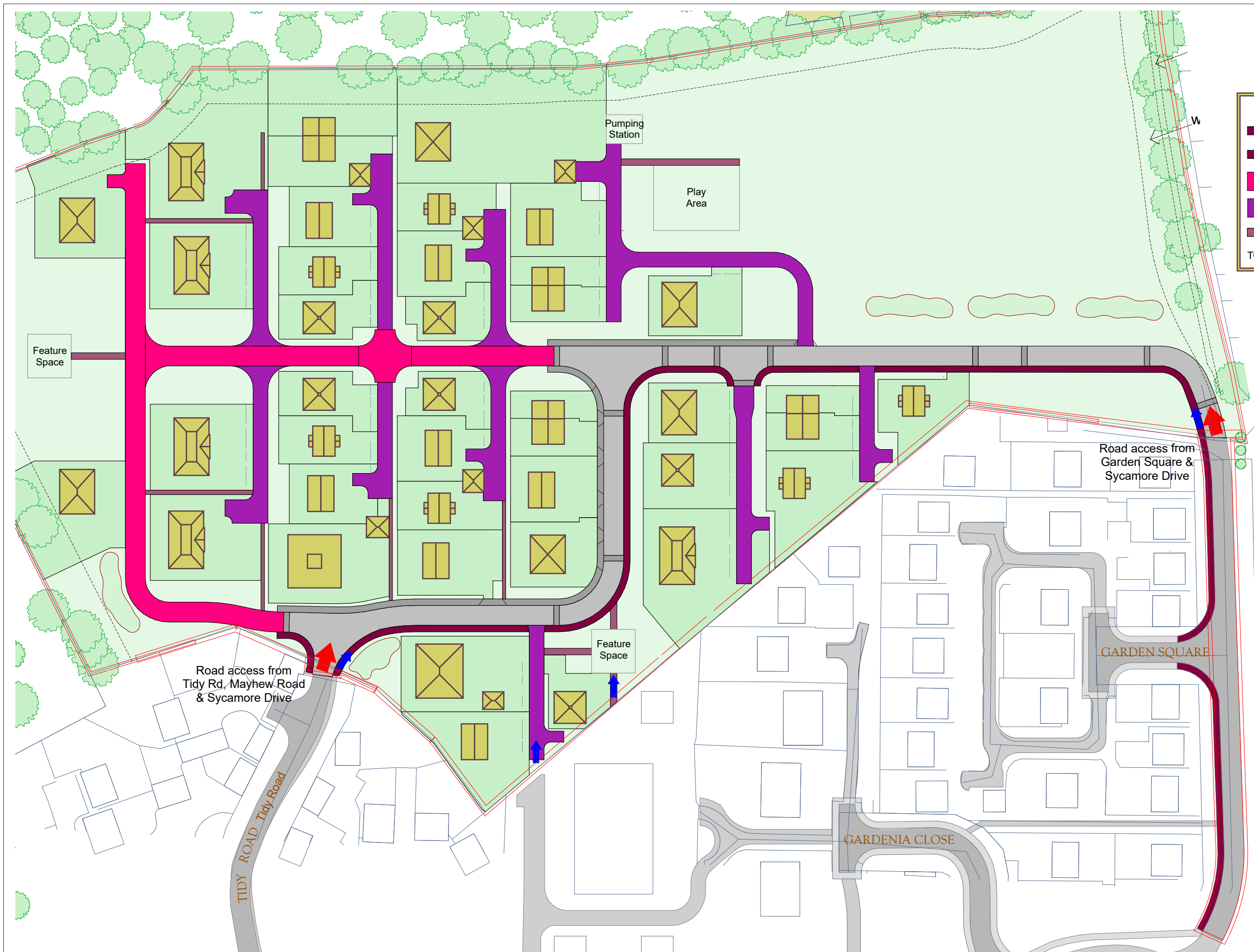
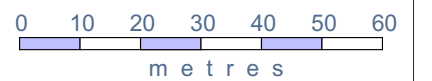
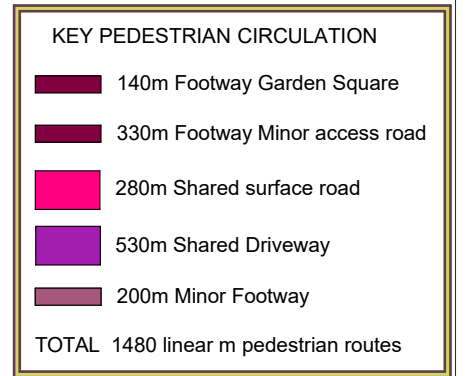
PLOT 27
FRAMLINGHAM
SECOND FLOOR



Typical view towards South
from a Framlingham house (Plot 27)
onto a flanking Woodbridge house (plot 28)

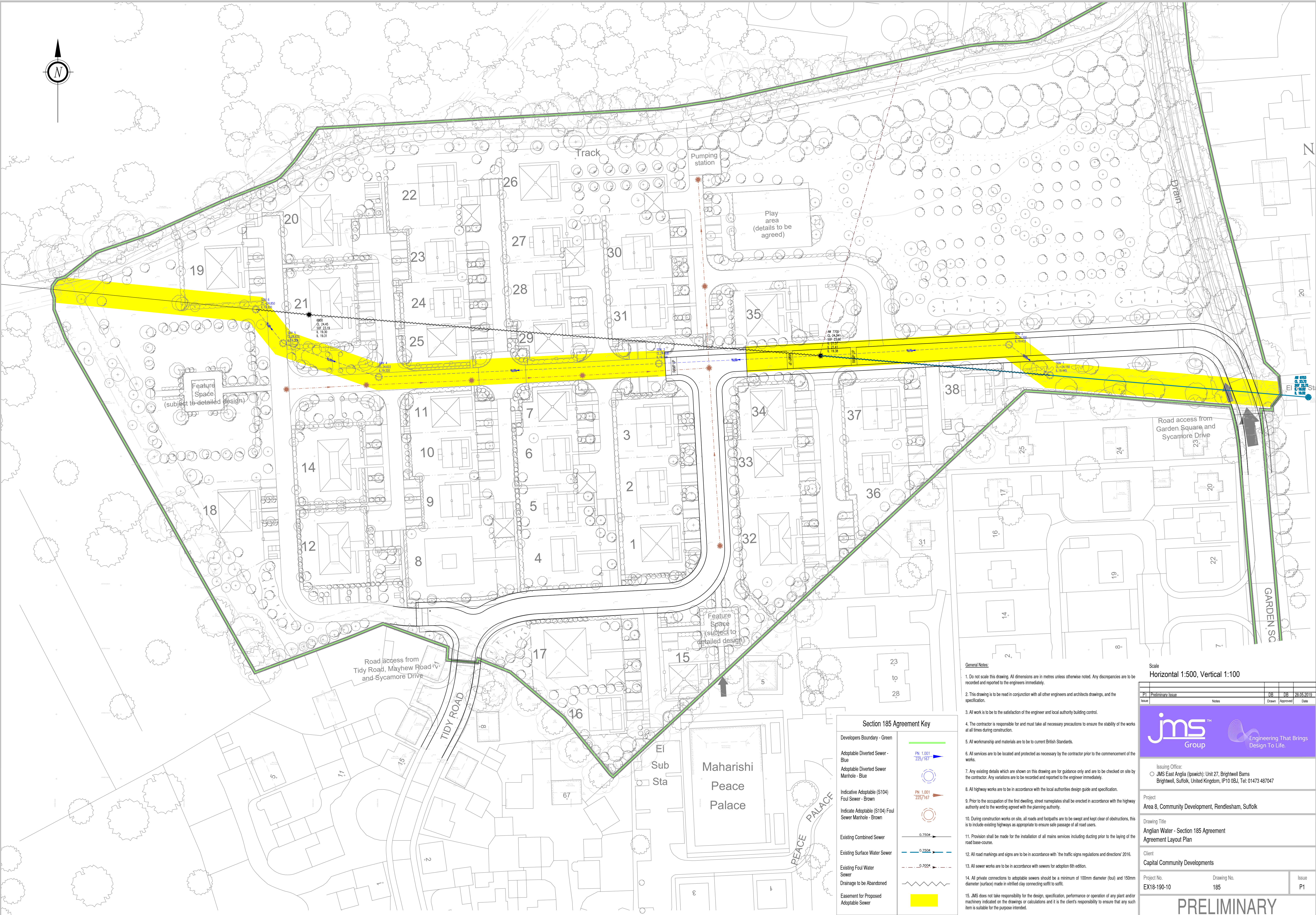
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Originator					
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Project				Project No.	
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Layout Title					
PLOTS 27 & 28 OVERLOOKING ON FF & SF					
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84 / R14 / OL / P				-	

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Project				Project No.	
CC DEVELOPMENTS AREA 8 RENDLESHAM					
Layout Title					
SITE PLAN PEDESTRIAN ROUTES					
Drawing Number				Rev	
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Appendix 10 Sewer Diversion Info



General Notes:

1. Do not scale this drawing. All dimensions are in metres unless otherwise noted. Any discrepancies are to be recorded and reported to the engineers immediately.
2. This drawing is to be read in conjunction with all other engineers and architects drawings, and the specification.
3. All work is to be to the satisfaction of the engineer and local authority building control.
4. The contractor is responsible for and must take all necessary precautions to ensure the stability of the works at all times during construction.
5. All workmanship and materials are to be to current British Standards.
6. All services are to be located and protected as necessary by the contractor prior to the commencement of the works.
7. Any existing details which are shown on this drawing are for guidance only and are to be checked on site by the contractor. Any variations are to be recorded and reported to the engineer immediately.
8. All highway works are to be in accordance with the local authorities design guide and specification.
9. Prior to the occupation of the first dwelling, street nameplates shall be erected in accordance with the highway authority and to the wording agreed with the planning authority.
10. During construction works on site, all roads and footpaths are to be swept and kept clear of obstructions, this is to include existing highways as appropriate to ensure safe passage of all road users.
11. Provision shall be made for the installation of all mains services including ducting prior to the laying of the road base-course.
12. All road markings and signs are to be in accordance with 'the traffic signs regulations and directions' 2016.
13. All sewer works are to be in accordance with sewers for adoption 6th edition.
14. All private connections to adoptable sewers should be a minimum of 100mm diameter (loul) and 150mm diameter (surface) made in vitrified clay connecting soffit to soffit.
15. JMS does not take responsibility for the design, specification, performance or operation of any plant and/or machinery indicated on the drawings or calculations and it is the client's responsibility to ensure that any such item is suitable for the purpose intended.

Scale
Horizontal 1:500, Vertical 1:100

Issue	Notes	Drawn	Approved	Date
P1	Preliminary Issue		DB	28.05.2019

jms Group
Engineering That Brings Design To Life.

Issuing Office:
JMS East Anglia (Ipswich): Unit 27, Brightwell Barns
Brightwell, Suffolk, United Kingdom, IP10 0BJ, Tel: 01473 487047

Project
Area 8, Community Development, Rendlesham, Suffolk

Drawing Title
Anglian Water - Section 185 Agreement
Agreement Layout Plan

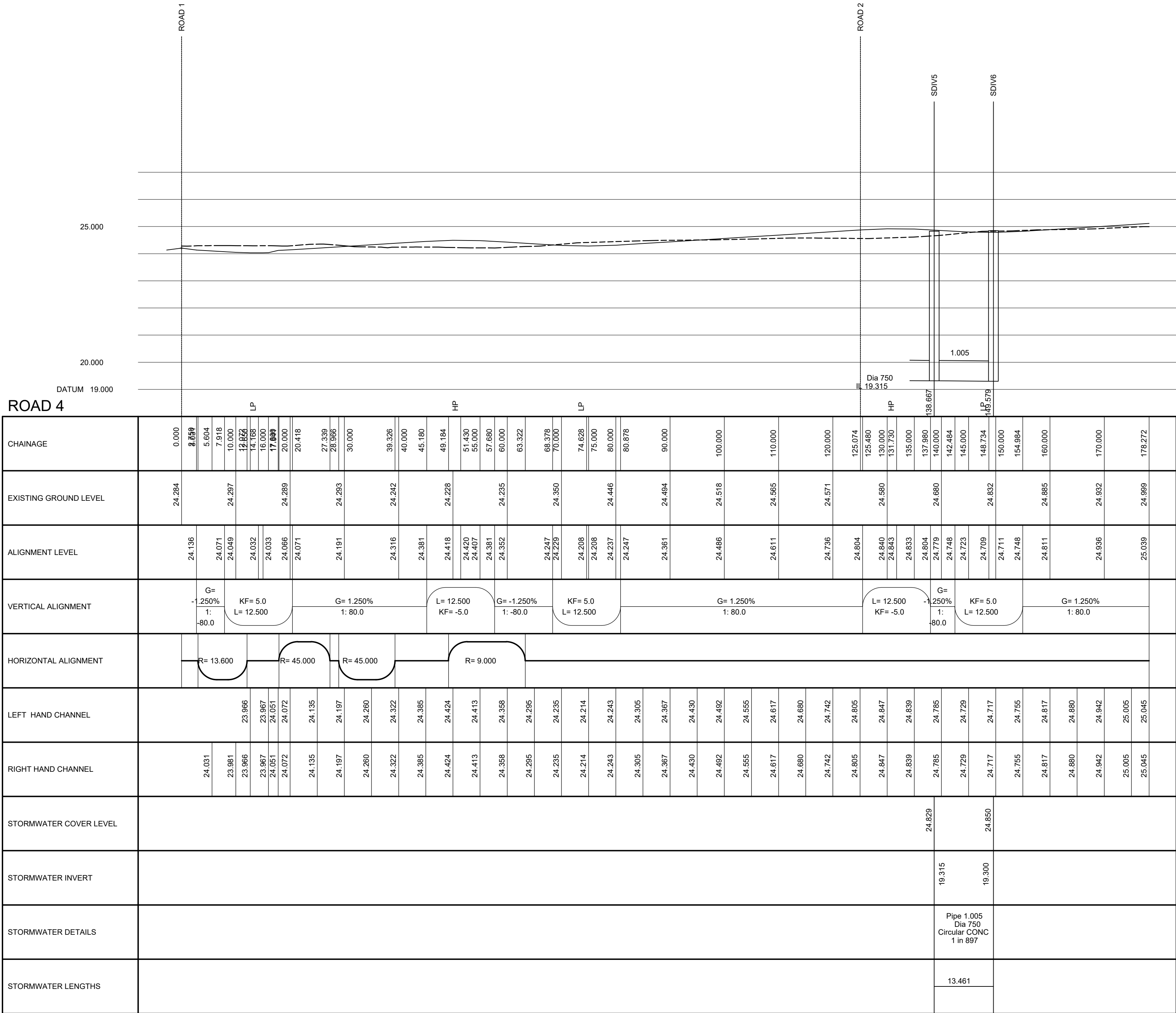
Client
Capital Community Developments

Project No. EX18-190-10	Drawing No. 185	Issue P1
----------------------------	--------------------	-------------

PRELIMINARY

Section 185 Agreement Key	
Developers Boundary - Green	
Adoptable Diverted Sewer - Blue	
Adoptable Diverted Sewer Manhole - Blue	
Indicative Adoptable (S104) Foul Sewer - Brown	
Indicate Adoptable (S104) Foul Sewer Manhole - Brown	
Existing Combined Sewer	
Existing Surface Water Sewer	
Existing Foul Water Sewer	
Drainage to be Abandoned	
Easement for Proposed Adoptable Sewer	

Manhole Number	Cover Level	Connections	Pipe			Manhole Size	Types		
			Code	Inverts	Diams		Manhole	Cover	
SDIV1	24.150					1800	A	D400	
E. 633867.980 N. 253785.120	3.955		0	1.000	19.445				750
SDIV2	24.200		1	1.000	19.432	750	1800	A	D400
E. 633855.325 N. 253794.578	4.018		0	1.001	19.432	750			
AW 7700 (Existing)	24.341		1	1.001	19.387	750	1800	A	D400
E. 633796.910 N. 253791.170	4.204		0	1.002	19.387	750			
SDIV3	24.808		1	1.002	19.363	750	1800	A	D400
E. 633746.771 N. 253788.740	4.695		0	1.003	19.363	750			
SDIV4	24.622		1	1.003	19.335	750	1800	A	D400
E. 633659.931 N. 253784.568	4.537		0	1.004	19.335	750			
SDIV5	24.829		1	1.004	19.315	750	1800	A	D400
E. 633630.282 N. 253795.040	4.764		0	1.005	19.315	750			
SDIV6 New MH on existing run	24.850		1	1.005	19.300	750	1800	A	D400
E. 633621.826 N. 253805.513	4.800								

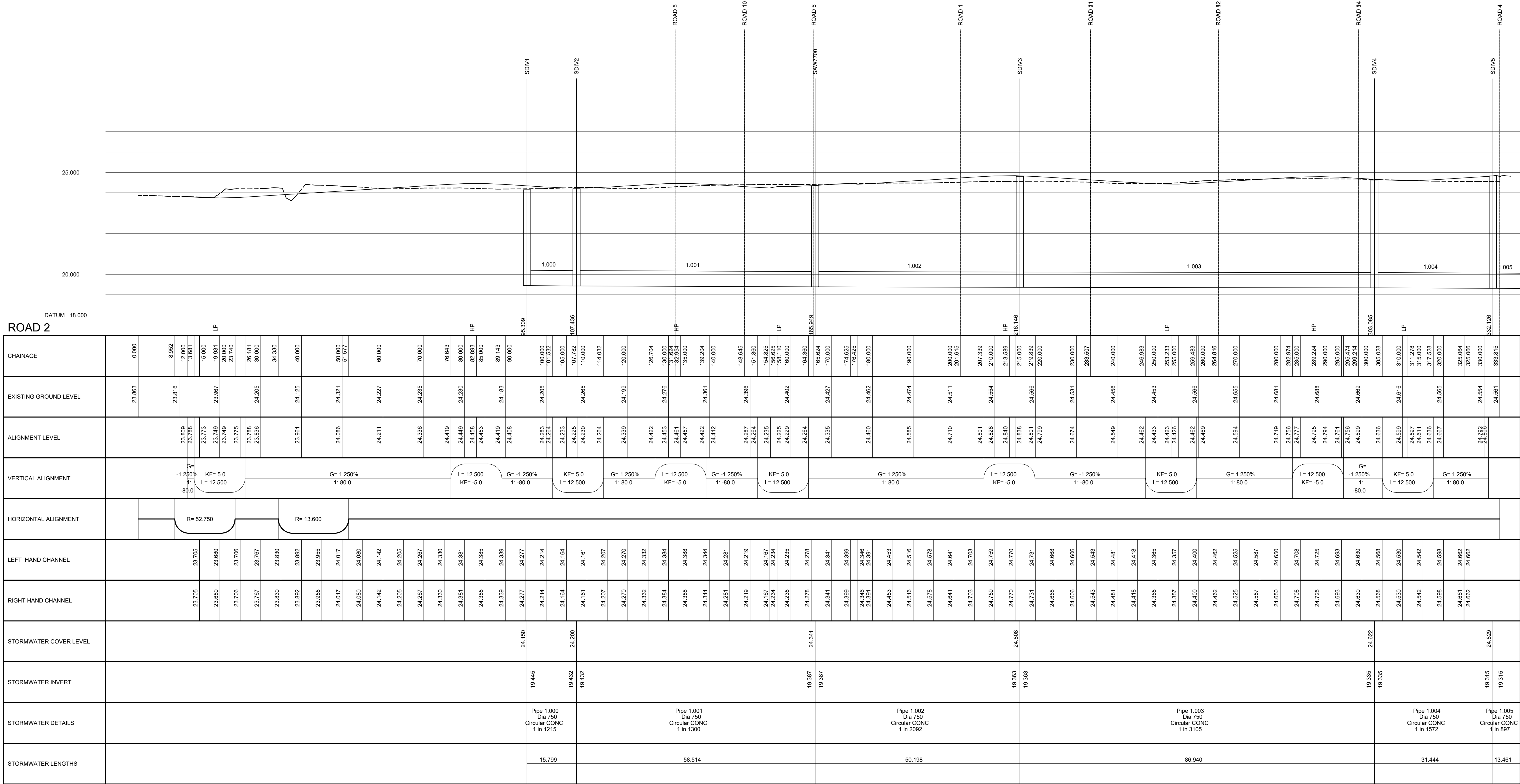


General Notes:

- Do not scale this drawing. All dimensions are in metres unless otherwise noted. Any discrepancies are to be recorded and reported to the engineers immediately.
- This drawing is to be read in conjunction with all other engineers and architects drawings, and the specification.
- All work is to be to the satisfaction of the engineer and local authority building control.
- The contractor is responsible for and must take all necessary precautions to ensure the stability of the works at all times during construction.
- All workmanship and materials are to be to current British Standards.
- All services are to be located and protected as necessary by the contractor prior to the commencement of the works.
- Any existing details which are shown on this drawing are for guidance only and are to be checked on site by the contractor. Any variations are to be recorded and reported to the engineer immediately.
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- Prior to the occupation of the first dwelling, street nameplates shall be erected in accordance with the highway authority and to the wording agreed with the planning authority.
- During construction works on site, all roads and footpaths are to be swept and kept clear of obstructions, this is to include existing highways as appropriate to ensure safe passage of all road users.
- Provision shall be made for the installation of all mains services including ducting prior to the laying of the road base course.
- All road markings and signs are to be in accordance with 'the traffic signs regulations and directions' 2016.
- All sewer works are to be in accordance with sewers for adoption 6th edition.
- All private connections to adoptable sewers should be a minimum of 100mm diameter (foul) and 150mm diameter (surface) made in vitrified clay connecting soffit to soffit.
- JMS does not take responsibility for the design, specification, performance or operation of any plant and/or machinery indicated on the drawings or calculations and it is the client's responsibility to ensure that any such item is suitable for the purpose intended.

Scale
Horizontal 1:500, Vertical 1:100

P1 Preliminary Issue		DB	DB	28.05.2019
Issue	Notes	Drawn	Approved	Date
 				
Issuing Office: JMS East Anglia (Ipswich): Unit 27, Brightwell Barns Brightwell, Suffolk, United Kingdom, IP10 0BJ, Tel: 01473 487047				
Project Area 8, Community Development, Rendlesham, Suffolk				
Drawing Title Anglian Water - Section 185 Agreement Manhole Schedule, and Road 4 Longsection				
Client Capital Community Developments				
Project No. EX18-190-10		Drawing No. 190		Issue P1
PRELIMINARY				



General Notes:

1. Do not scale this drawing. All dimensions are in metres unless otherwise noted. Any discrepancies are to be recorded and reported to the engineers immediately.
2. This drawing is to be read in conjunction with all other engineers and architects drawings, and the specification.
3. All work is to be to the satisfaction of the engineer and local authority building control.
4. The contractor is responsible for and must take all necessary precautions to ensure the stability of the works at all times during construction.
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11. Provision shall be made for the installation of all mains services including ducting prior to the laying of the road base-course.
12. All road markings and signs are to be in accordance with 'the traffic signs regulations and directions' 2016.
13. All sewer works are to be in accordance with sewers for adoption 6th edition.
14. All private connections to adoptable sewers should be a minimum of 100mm diameter (foul) and 150mm diameter (surface) made in vitrified clay connecting silt to silt.
15. JMS does not take responsibility for the design, specification, performance or operation of any plant and/or machinery indicated on the drawings or calculations and it is the client's responsibility to ensure that any such item is suitable for the purpose intended.

Scale
Horizontal 1:500, Vertical 1:100

P1 Preliminary Issue		DB	DB	28.05.2019
Issue	Notes	Drawn	Approved	Date
 				
Issuing Office: JMS East Anglia (Ipswich): Unit 27, Brightwell Barns Brightwell, Suffolk, United Kingdom, IP10 0BJ, Tel: 01473 487047				
Project Area 8, Community Development, Rendlesham, Suffolk				
Drawing Title Anglian Water - Section 185 Agreement Road 2 Longsection				
Client Capital Community Developments				
Project No. EX18-190-10		Drawing No. 191		Issue P1
PRELIMINARY				

Appendix 11 Correspondence with SCC s106 Officer

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 23 May 2019 11:37
To: neil.mcmanus@suffolk.gov.uk
Subject: Queries re SCC response to a planning application

Good morning Neil,

I am writing to you in relation to a consultation response made on a planning application of ours. I have a couple of questions if I may? I have tried to contact you a number of times and have left a couple of voicemails as I had hoped to discuss the matter rather than resort to email.

The response was to planning application DC/19/1499 in Suffolk Coastal and was made on 19th April 2019. I will also refer you to a consultation response made on a previous, unrelated, but nearby planning application and the reference for that was DC/17/5380 and was made on 12th February 2018.

The response to 5380 has some inconsistencies with 1499, there may be reasons for this, so I will ask the following questions:

- The consultation response to the planning application for 290 dwellings dated Feb 2018 stated that the 290 would generate a demand of 30 early years places. It stated that there was a surplus of 27 spaces for early years provision, with 3 spaces required to be provided/funded but SCC did not seek an s106 obligation and it was left to CIL bidding.
 - Is the current early years provision information (referred to in the response to 1499) derived from the Childcare Sufficiency Assessment (Dec 2018)?
 - Was the Feb 2018 response to 5380 based on an earlier CSA?
 - In respect of early years provision what is the 'strategy' that is referred to in the response to 1499?
 - National planning practice guidance requires consistency in planning. Why was the £25k required of 5380 suitable for a CIL funding bid but the £52,800 required of 1499 the subject of a s106 request?
- School transport provision was not required for 5380. Why is it now for 1499?

Regards

Steven Bainbridge
Principal Planning Manager

Email: steven@parkerplanningservices.co.uk
Phone: 01284 336121

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Norfolk Office:
Parker Planning Services Ltd,
Orchard House,
Hall Lane, East Tuddenham.
Norfolk. NR20 3LR
Phone: 01603 516319



Suffolk Office:
Parker Planning Services Ltd,
Northgate Business Centre,
10 Northgate Street, Bury St Edmunds,
Suffolk. IP33 1HQ
Phone: 01284 336348

Essex Office:
Parker Planning Services Ltd,
Moulsham Mill, Parkway,
Chelmsford,
Essex. CM2 7PX
Phone: 01245 934184

Steven Bainbridge

From: PPS Project Emails
Subject: FW: Queries re SCC response to a planning application

From: Neil McManus <Neil.McManus@suffolk.gov.uk>
Sent: 28 May 2019 12:20
To: Steven Bainbridge <steven@parkerplanningservices.co.uk>
Subject: RE: Queries re SCC response to a planning application

Dear Steven,

Thank you for your email. I have been on annual leave, returning to the office today.

My letter dated 19/04/19 set out the justification for the early years and school transport s106 contributions. The expansion of the existing primary school will necessitate the delivery of a new early years setting. School transport costs will arise in respect of secondary age pupils.

Kind regards, Neil.

Steven Bainbridge

From: PPS Project Emails
Subject: FW: Queries re SCC response to a planning application
Importance: High

From: steven@parkerplanningservices.co.uk <steven@parkerplanningservices.co.uk>
Sent: 28 May 2019 14:17
To: 'Neil McManus' <Neil.McManus@suffolk.gov.uk>
Subject: RE: Queries re SCC response to a planning application
Importance: High

Good afternoon Neil,

Thank you for your email but can I ask you to answer the questions in my email specifically please?

We have a meeting coming up with the planning officer and the lawyers are working on the s106 and need the inconsistencies mention in my email bottomed out.

We are also instructing a QC in preparation for the meeting with the planning officers as it appears the application is headed for refusal again – so they will want to have an answer to this issue too, not least to reduce the number of people likely to be cross-examined at any appeal to a minimum.

Regards

Steven Bainbridge
Principal Planning Manager

Email: steven@parkerplanningservices.co.uk
Phone: 01284 336121

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Norfolk Office:
Parker Planning Services Ltd,
Orchard House,
Hall Lane, East Tuddenham.
Norfolk. NR20 3LR
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Suffolk Office:
Parker Planning Services Ltd,
Northgate Business Centre,
10 Northgate Street, Bury St Edmunds,
Suffolk. IP33 1HQ
Phone: 01284 336348

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Chelmsford,
Essex. CM2 7PX
Phone: 01245 934184

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Steven Bainbridge

From: PPS Project Emails
Subject: FW: Queries re SCC response to a planning application

From: Neil McManus <Neil.McManus@suffolk.gov.uk>
Sent: 28 May 2019 21:06
To: Steven Bainbridge <steven@parkerplanningservices.co.uk>
Subject: Re: Queries re SCC response to a planning application

Dear Steven,

Each planning application is individually assessed on its own merits, taking into account current circumstances. Previously I had lodged a holding objection to the earlier refused application in respect of primary school provision. The strategy is to expand the existing school up to 420-places, but to do this will require a new early years setting.

In light of recent changes to the school transport policy, SCC now routinely requests contributions towards school transport costs in circumstances where the nearest school is over 3-miles away (2-miles up to the age of 8) and/or there is no safe walking route. In this situation the nearest secondary school is over 3-miles from the proposed development. This approach is supported by the recent DfE guidance on securing funding for education.

Kind regards, Neil.

Sent from Samsung Mobile on O2

Steven Bainbridge

From: steven@parkerplanningservices.co.uk
Sent: 29 May 2019 11:43
To: 'Neil McManus'
Subject: RE: Queries re SCC response to a planning application

Hello Neil,

Thank you for your email. I have inserted your comments as 'answers' to the questions posed. I've highlighted the questions that have not been answered. Please confirm that my understanding is correct. If not please put the answers next to the relevant questions.

- The consultation response to the planning application for 290 dwellings dated Feb 2018 stated that the 290 would generate a demand of 30 early years places. It stated that there was a surplus of 27 spaces for early years provision, with 3 spaces required to be provided/funded but SCC did not seek an s106 obligation and it was left to CIL bidding.
 - Is the current early years provision information (referred to in the response to 1499) derived from the Childcare Sufficiency Assessment (Dec 2018)?
 - Was the Feb 2018 response to 5380 based on an earlier CSA?
 - In respect of early years provision what is the 'strategy' that is referred to in the response to 1499?
The strategy is to expand the existing school up to 420-places, but to do this will require a new early years setting.
 - National planning practice guidance requires consistency in planning. Why was the £25k required of 5380 suitable for a CIL funding bid but the £52,800 required of 1499 the subject of a s106 request?
- School transport provision was not required for 5380. Why is it now for 1499? *In light of recent changes to the school transport policy, SCC now routinely requests contributions towards school transport costs in circumstances where the nearest school is over 3-miles away (2-miles up to the age of 8) and/or there is no safe walking route. In this situation the nearest secondary school is over 3-miles from the proposed development. This approach is supported by the recent DfE guidance on securing funding for education.*

Regards

Steven Bainbridge
Principal Planning Manager

Email: steven@parkerplanningservices.co.uk
Phone: 01284 336121

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Phone: 01284 336348

Essex Office:
Parker Planning Services Ltd,
Moulsham Mill, Parkway,
Chelmsford,
Essex. CM2 7PX
Phone: 01245 934184

Appendix X Local Plan Reps

Building for Life 2012 and 2018

Building for Life Assessment

Area 8 Planning History

NPPG Extract re Design Frameworks

Draft s106

HRA Consultation email to Natural England

Noise Assessment

Email from Tree Surveyor re Noise Mitigation

Forest Gardens information

Appendix X i



Representation Form

Make a representation on the Suffolk Coastal Final Draft Local Plan

This representation form relates to the Suffolk Coastal Final Draft Local Plan, which has been published under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012 (as amended).

The representations period runs from **Monday 14 January to 17.00 on Monday 25 February 2019**. Representations received after this date may not be considered. Only representations received within this period have a statutory right to be considered by the Inspector at the Examination.

The representation form can be completed and submitted via:

- The Council's online consultation system at www.eastsuffolk.gov.uk/finaldraftlocalplan (this is the Council's preferred way of receiving representations);
- Or complete a representation form (available to download from the consultation system or by contacting the Planning Policy and Delivery Team suffolkcoastallocalplan@eastsuffolk.gov.uk / 01394 444557), and return via email to suffolkcoastallocalplan@eastsuffolk.gov.uk or by post to Planning Policy & Delivery Team, East Suffolk House, Station Road, Riduna Park, Melton, Woodbridge, IP12 1RT.

Before completing a representation, please read the accompanying 'Guidance when Making a Representation', available at www.eastsuffolk.gov.uk/finaldraftlocalplan

This form has 2 parts: Part A for personal details and Part B for your representation(s). **Please fill in Part B for each representation you wish to make.**

By responding to this consultation you are accepting that your name and representation will be available for public inspection and published on line in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Postcode

[Redacted]

Telephone
Number

[Redacted]

E-mail Address

[Redacted]

PART B | Your Representation

Please complete a separate form for each representation.

3. To which part of the Local Plan does this representation relate?

Paragraph number	<input type="text"/>	Policy Number	<input type="text"/>	Policies Map	<input type="text"/>	Appendix	<input type="text"/>
---------------------	----------------------	------------------	----------------------	--------------	----------------------	----------	----------------------

4. Do you consider that this part of the Plan meets the legal and procedural requirements?

(See [guidance note](#) for assistance with this question)

Yes ☐ No ☐

5. Do you consider this part of the Plan has met the tests of soundness?

(See [guidance note](#) for assistance with this question)

Yes ☐ No ☐

6. Do you consider this part of the Plan to be unsound because it is not:

(See [guidance note](#) for assistance with this question)

Positively
prepared ☐ Justified ☐

Effective ☐ Consistent with
national policy ☐

7. Details of Representation:

Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

8. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound:

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

9. If your representation is seeking a change, do you consider it necessary to participate in the public examination?

Please note the Planning Inspector will make the final decision on who will be invited to participate in individual sessions at the public examination, although all members of the public may observe the proceedings.

Yes, I wish to participate
at the oral examination ☐

No, I do not wish to participate
at the oral examination ☐

10. If you wish to participate in the public examination, please outline why you consider it to be necessary:

11. Being kept informed:

Yes, I would like to
be kept informed ☐

You will be notified of Submission of the Local Plan to the Secretary of State for Public Examination; publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and adoption of the Local Plan.

No, I do not wish to be kept informed
of future progress of the plan ☐

12. Date of Representation and signature:

Date	Signature
------	-----------

Data protection

The information you have supplied is being collected in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. By returning this form you consent to Suffolk Coastal District Council holding and using your information in this way.

By responding to this consultation you are accepting that your name and response will be available for public inspection and published on line in accordance with the Act stated above. However, personal/email addresses, and telephone numbers will not be published.

After the end of the representations period, the Council will submit all representations received to the Secretary of State in a secure manner, this will include any personal data you have supplied.

Data will be processed and held in accordance with the Data Protection Act 1998 (and any updates). Data will be retained securely until the Local Plan is superseded or by the end of the plan period (April 2036) whichever is the earlier date.

Further information about data protection can be found on the East Suffolk website

<http://www.eastsuffolk.gov.uk/yourcouncil/access-to-information/data-protection-act/>



January 2019

Representations in Respect of Policy SCLP12.62: Land West of Garden Square, Rendlesham

Suffolk Coastal Final Draft Local
Plan Consultation 2019

Norfolk Office 01603 516319

Orchard House
Hall Lane
East Tuddenham,
Norfolk, NR20 3LR

Suffolk Office 01284 336348

The Northgate Business Centre,
10 Northgate Street,
Bury St Edmunds,
Suffolk, IP33 1HQ

Essex Office 01245 934184

Moulsham Mill,
Parkway,
Chelmsford
Essex, CM2 7PX

Information

Date	January 2019
Site Address	Land West of Garden Square, Rendlesham
Development Description	Final Draft Local Plan Representations
Local Planning Authority	Suffolk Coastal District Council
Representee	Capital Community Developments Ltd.

Author: Jason Parker

Director and Head of Planning

Report Revision:1

1 Details of the Representation

- 1.1 These representations are submitted to the Suffolk Coastal District Council Final Draft Local Plan consultation on behalf of Capital Community Developments Ltd. in respect of Land West of Garden Square (a site allocated for housing development in local plans since 1996) and its respective site-specific policy and supporting text.
- 1.2 The site is allocated in the current local plan and identified as site SSP12. The site was included in the first draft local plan and identified there as site SCLP12.57. It is identified in this final draft local plan as site SCLP12.62 and hereafter referred to as 'the site'.
- 1.3 As described in paragraph 12.698 of the Final Draft document this allocation is "carried forward from the Site Allocations and Area Specific Policies Development Plan Document (January 2017)" and has been carried forward relatively unchanged, with some additional pre-ambles and minor policy changes.
- 1.4 Representations have been made by or on behalf of Capital Community Developments Ltd. throughout the local plan process and during the process of the currently adopted local plan, notably in August 2016 (written representation no. 7901), 1 September 2016 (attendance at examination in public), and 14 September 2018 (written representation, reproduced in Enclosure 3). At the first draft local plan stage representations were made supporting the principle of the housing allocation but objecting to the number of homes stated in the policy. We are maintaining that position and continue to support the principle of the housing allocation for the reasons given previously, whilst objecting to the quantum of housing stated in the policy.
- 1.5 The quantum of housing proposed in the draft policy has been depressed unnecessarily; the site has been allocated for 75 dwellings from 1996 to 2014 but the draft plan preamble refers to "limiting factors" which are not relevant and are not supported by evidence.
- 1.6 We are of the opinion that if the so-called 'limiting factors' can be shown not to exist, and the local planning authority have no evidence to the contrary, then the site can and should be re-allocated for 75 dwellings and this would contribute to the soundness of the local plan.
- 1.7 We set out below the reasoning which demonstrates why these 'limiting factors' were either unwarranted in the first place or have since been demonstrated, through formal submissions to the local planning authority, no longer to exist.
- 1.8 The arguments and evidence referenced in these representations is not new and had been advanced at the Site Allocations local plan examinations in autumn 2016 or in formal planning applications and is therefore 'on record' with the local planning authority. It is reproduced here for ease of reference.

The Highways 'Limiting Factor'

- 1.9 During the preparations for the Site Allocations DPD discussions were held with the Council's planning policy officers regarding the emerging policy for Bentwaters which is the former airfield immediately adjacent to the village of Rendlesham. Part of those discussions centred around removing reference to 'highways limiting factors' in the pre-ambles to the draft Bentwaters policy.
- 1.10 This was because a site-wide planning application (the 'Bentwaters Masterplan' C/10/3239 approved in 2014/5) had assessed highways capacity along the A1152 and concluded that there was no capacity issue on the A1152 and therefore no mitigation was required of the Bentwaters planning application by the County Highways Authority (Enclosure 1). The 'limitation' that had crept into the emerging policy was a remnant of perception of earlier public and consultee concerns about the future of the former airbase; both the technical airfield side and the domestic residential side.
- 1.11 The references to highways limitations were removed in respect of Bentwaters and its site-specific policy and replaced with positively worded pre-ambles simply noting that the site benefitted from the A1152 Suffolk Lorry Route Network.

- 1.12 In December 2017 a planning application for up to 290 dwellings was received by the Council and related to land part covered by policy SSP13 (the other Rendlesham housing allocation). That planning application included a transport assessment which recommended mitigation in the form of remedial measures to the A1152 to account for a “future scenario” where other potential development in and around Woodbridge and Melton came forward. The highways authority did not object to the planning application and confirmed it met NPPF policy (Enclosure 2).
- 1.13 As described in the First Draft Plan representations (Enclosure 3) in 2018 a planning application for 75 dwellings on the SSP12 site (now SCLP12.62) was refused but not for highways reasons. The County Highways Authority concluded that “The development will not negatively impact upon the highway network with regard to traffic flows” (Enclosure 4).
- 1.14 We trust it is therefore clear that no ‘highway factors’ currently exist or have existed in fact since the policy was first started to be drafted in 2014 which would justify the depression of housing numbers on the site.
- 1.15 Therefore, if it is accepted that there are no highway factors or evidence thereof the quantum of housing should be returned to the historic level of 75 dwellings.

The Education ‘Limiting Factor’

- 1.16 Paragraph 12.702 includes a new ‘limitation’ not included in the first draft plan which is not a proper limitation and should be removed.
- 1.17 The requirements of paragraphs 12.710 to 12.12.714 are noted because it is standard practice for a development to both generate new demand and to facilitate that new demand through CIL payments.
- 1.18 It is the role of the local education authority (Suffolk County Council) to ensure sufficient school places are available by building or extending schools to meet demand. Charging authorities may pass money to bodies outside their area to deliver infrastructure that will benefit the development of the area (PPG Paragraph: 082 Reference ID: 25-082-20140612).
- 1.19 Education capacity should not be a limiting factor to the number of homes if, as paragraphs 12.710 to 12.12.714 do, the local plan makes clear that CIL monies generated will address any capacity matters arising from a proposed development upon submission of a planning application.

The Cordon Sanitaire and Sewer ‘Limiting Factor’

- 1.20 The enclosed drawing (Enclosure 5) shows the accepted cordon sanitaire as required by Anglia Water and the existing sewers. The nett developable area is some 3.2ha. At a reasonable development density of 30 dwellings per hectare that would justify an allocation of 96 dwellings.
- 1.21 Paragraph 122 of the NPPF 2018 requires that “Planning policies and decisions should support development that makes efficient use of land”.
- 1.22 On the basis that the cordon sanitaire and sewers are clearly not limiting factors for potentially 96 dwellings then they are evidently not limiting factors for 75 dwellings. To make efficient use of the allocated site the number of dwellings should be increased from 50 back up to 75 dwellings.

Summary

- 1.23 In respect of Site SCLP12.62 Land West of Garden Square:
- The plan is **not positively prepared** because arbitrary ‘limiting factors’ have been cited to depress housing figures with no evidence provided to support them.
 - The reduction in the proposed housing figure from the long-established 75 dwellings to approximately 50 dwellings is therefore illogical and **unjustified**.
 - The resultant in-efficient use of land means the current policy approach is **inconsistent with NPPF paragraph 122**.

Appendix 1 Plan and Policy Changes Necessary for Soundness

The following table clearly sets out the existing text in the relevant part of the final draft local plan, suggested deletions (text is struck out ~~thus~~) and suggested insertions (text is underlined thus). Suggested major modifications are in **bold**. Minor modifications are not.

Paragraph/ Policy No.	Paragraph or Policy Text	Rationale for changes sought
12.698	These allocations are carried forward from the Site Allocations and Area Specific Policies Development Plan Document (January 2017). Land west of Garden Square is allocated for the development of approximately 50 <u>75</u> dwellings and also Land east of Redwald Road is allocated for the development of approximately 50 dwellings.	No change
12.699	Rendlesham (2011 pop. 3,013) is a Large Village in the settlement hierarchy which is altogether larger, and contains a much wider variety of facilities than is common to most other Large Villages in the District given its historic legacy as a former US Airforce base. <u>The village is connected to the A12 and to the larger settlements of Woodbridge and Ipswich via the A1152 which, these days is categorised as a Zone Distributor Route as part of the Suffolk Lorry Route Network, recognising the fact it was upgraded in the 1980s as a legacy of the village's military past when the airbase generated significant volumes of traffic.</u> It also has a 'made' Neighbourhood Plan, containing policies relating to the promotion of the village centre to continue to develop to meet the needs of existing and future residents, and the provision of allotments.	This change brings the preamble to this policy in line with that of policy SCLP12.41 Bentwaters (currently SSP24) which is on the opposite side of the road to the village of Rendlesham but also relies on the same road; the A1152.
12.700	The Neighbourhood Plan builds on the work of the earlier masterplan for Rendlesham and seeks to ensure that the village continues to develop and function to meet the needs of new and established residents and businesses, concentrating on the provision of services and facilities required to meet the needs of the new and growing population. Across the main road from the main residential area, is a large employment site containing a mix of uses (the former technical base). A comprehensive development plan for the whole employment site has been granted planning permission which will guide the future provision of employment land in this area.	No change
12.701	Whilst the Neighbourhood Plan does not allocate land for housing, Section 10 of the plan includes a number of objectives (3 – 3f) in relation to new housing e.g. to density and streetscene. In addition, Policy RNPP3 requires that new residential or mixed use development makes provision towards the identified local need for allotments, orchards and growing spaces.	

12.702	<p>In the longer term, the village may have capacity to accommodate more than the 100 125 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. Higher levels of growth are likely to trigger the need for new education and early years provision. There is a need to maintain a clear overview of the cumulative impact of individual developments on the local road network from Rendlesham through to Melton and the A12. The internal road layout within the village (a consequence of its original function as an airbase) means access from the village to the external road network is limited. There are also few opportunities to access the adjacent countryside due to lack of public footpaths and the presence of a perimeter fence, again a legacy of its former use as an airbase. The provision of a new footpath/bridleway is a condition <u>has been provided as a benefit of the</u> a recent planning permission for the <u>nearby</u> employment site providing residents with more direct access to Rendlesham / Tunstall Forest.</p>	<p>This change to the dwelling numbers reflects what these representations are seeking to achieve.</p> <p>The removal of the reference to highway factors is explained in the supporting arguments above.</p> <p>The removal of the reference to education capacity as a limiting factor is described above.</p> <p>The change to the reference to the right of way is simply updating the facts.</p>
12.703	<p>Two sites are allocated for large scale housing schemes which together can provide approximately 100 125 homes. Both sites provide the opportunity for additional community benefit as envisaged in the Neighbourhood Plan.</p>	<p>This change to the dwelling numbers reflects what these representations are seeking to achieve.</p>
12.704	<p>Development proposals for both allocations will need to investigate the cumulative traffic impact on air quality at Melton crossroads and the Air Quality Management Area declared in Woodbridge. An Air Quality Assessment, together with a mitigation appraisal, will be required.</p>	
12.705	<p>The site allocated as SCLP12.62 is the northern of the two sites identified on the plan above. The main limiting planning factors in respect of this site are its proximity to the Water Re-cycling Centre (sewage treatment works) which requires the provision of a 'cordon sanitaire', and the sewers that cross the site. The minimum distance for the cordon sanitaire will be a matter for discussion with Anglian Water as will any layout issues linked to the alignment of the sewers. The number of homes and the area on which development could take place has therefore been reduced to approximately 50.</p>	<p>These changes reflect the arguments in these representations that there is no evidence for the claimed limiting factors.</p> <p>This change to the dwelling numbers reflects what these representations are seeking to achieve.</p>
12.706	<p>Anglian Water confirmed that there is likely to be a need for improvements to the foul sewerage network. Land not suitable for building does however have the potential to provide for a mix of informal open space and allotment provision in accordance with Rendlesham Neighbourhood Plan objective 4, Allotments, Orchards and Growing Places and Neighbourhood Plan Policy RNPP3. Informal open space will provide space for daily dog walking and complement existing more formal green space provision nearby, as</p>	

	an alternative to the more sensitive Rendlesham and Tunstall Forests.	
12.707	The Cross Boundary Water Cycle Study between Suffolk Coastal District Council and Ipswich Borough Council identifies this site as being within Flood Zone 1. As the site area is over 1 ha, any proposals for development must be accompanied by a site-specific Flood Risk Assessment.	This paragraph is new text since the first draft local plan and we have no objections to its inclusion as general information.
12.708	The design and layout of the scheme will be expected to have due regard to the housing and transport objectives set out in the 'made' Rendlesham Neighbourhood Plan.	
12.709	Suffolk County Council Archaeology have also confirmed that the site lies within the former extent of Rendlesham Hall and within the broader landscape, where there is evidence of significant multi-period archaeological remains. An archaeological assessment at an appropriate stage in the design of the development will be required to allow for in-situ preservation as necessary.	
12.710	Rendlesham Primary School is operating close to capacity and, considering this allocation along with education forecasts, would be marginally over capacity during the first five years of the plan period. However, the provision of a greater proportion of housing designed to meet the needs of the elderly population or smaller dwellings could assist in addressing this. Farlingaye High School is currently operating over capacity with no immediate opportunities for expansion. A contribution will, therefore, be required through the Community Infrastructure Levy towards the creation of additional capacity at the proposed school at Brightwell Lakes to increase secondary education provision in the area.	This paragraph is new text since the first draft local plan and we have no objections to its inclusion.
12.711	Early years provision in Rendlesham ward is forecast to be over capacity and a contribution is therefore required through the Community Infrastructure Levy towards expansion of existing provision as set out in the Infrastructure Delivery Framework.	This paragraph is new text since the first draft local plan and we have no objections to its inclusion.
12.712	The East Suffolk & Ipswich Clinical Commissioning Group have indicated that additional primary care floorspace will be required at Rendlesham Medical Practice to meet the needs arising from new development. A contribution will be required through the Community Infrastructure Levy towards enhancements at Rendlesham Medical Practice, as detailed in the Infrastructure Delivery Framework.	This paragraph is new text since the first draft local plan and we have no objections to its inclusion.
12.713	Suffolk County Council have indicated that Foxhall household waste recycling centre is overcapacity and under pressure due to the site size and access from the highway. As a result, a contribution will be required through the Community Infrastructure Levy towards the expansion of the centre as identified in the Infrastructure Delivery Framework.	This paragraph is new text since the first draft local plan and we have no objections to its inclusion.

12.714	Suffolk County Council have provided information relating to library improvements across the District. This site falls within the catchment of Woodbridge library which has been identified as a library where improvements are necessary to enhance provision. A contribution through the Community Infrastructure Levy will be requested towards the improvement of library provision as identified in the Infrastructure Delivery Framework.	This paragraph is new text since the first draft local plan and we have no objections to its inclusion.
SCLP12.62	<p>5.05ha of land west of Garden Square, Rendlesham, as shown on the Policies Map, is identified for a mixed development of approximately 50 dwellings and greenspace provision.</p> <p>Development will be expected to accord with the following criteria:</p> <ul style="list-style-type: none"> a) Meet Reflect the minimum distance cordon sanitaire from the Water Recycling Centre within outside of which new residential development is considered acceptable as advised by Anglian Water; b) Accommodate the sewers that cross the site; c) The development will need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available; d) The design, layout, mix and type of housing proposed is compatible with the housing and transport objectives set out in the 'made' Rendlesham Neighbourhood Plan; e) Provision of affordable housing; f) The remaining greenspace should be used for a mix of informal open space suitable for daily dog walking, allotments or orchards in accordance with Rendlesham Neighbourhood Plan policy RNPP3; g) Provision of a substantial landscape buffer to the northern and western boundaries where it abuts open countryside; h) A site-specific Flood Risk Assessment is required; i) Evidence is required to demonstrate there is adequate provision for treatment at the Water Recycling Centre or that this can be provided; and j) An archaeological assessment will be required. <p>In addition, the air quality impacts of traffic from cumulative development at Melton crossroads and the Air Quality Management Area declared in Woodbridge will need to be investigated in the form of an Air Quality Assessment, together with a mitigation appraisal.</p>	<p>This change to the policy wording is intended to make the criteria make sense. Residential development within the cordon sanitaire is not acceptable to Anglian Water.</p> <p>This change is suggested reflecting the fact that the northern and western boundaries simply do not abut open countryside but rather adjoin dense woodland as shown on the enclosed aerial photograph (Enclosure 6).</p>

Enclosure 1

Your ref:

My Ref: KAB/
10/B/01

Date:
13/02/14

**UPDATE NOTE
2014 TRAFFIC VOLUMES
BENTWATERS PARK ACCESS.**

1. I have been advised by Evolution Town Planning that it is producing an update to the Environmental Statement relating to the Bentwaters planning application C10/3239/FUL.
2. In that regard, it seemed pertinent to update the vehicle flow data relating to the vehicle flows using the access to Bentwaters Park.
3. Please find attached three appendices from the Transport Assessment submitted with the planning application, which show the March 2010 recorded vehicle flows, as follows:

appendix	survey period	vehs in	vehs out	2 way flow [hgv]
KAB 11	morning peak hour	114	59	173 [16]
KAB 13	evening peak hour	41	151	192 [3]
KAB 15	24hrs flow	795	802	1597 [112]

4. Also attached, as documents (doc) 1 to 6 is the following information gleaned from an automatic traffic counter (ATC) which was located on the access road to Bentwaters Park, for a two weeks' period, commencing 15th January 2014.

Doc 1	location of ATC
Doc 2	vehicle classification table
Doc 3	vehicle volume summary - week 1 (two way flows)
Doc 4	vehicle volume summary - week 2 (two way flows)
Doc 5	vehicle class summary - week 1 (n/bound + s/bound + two way flows)
Doc 6	vehicle class summary - week 2 (n/bound + s/bound + two way flows)

5. From the ATC data, the following comparative 2014 recorded vehicle flows are noted.

Document	survey period weekday average	vehs in	vehs out	2 way flow [hgv]
Doc 3 & Doc 5 week 1	morning peak hour	149	44	193 [5]
	evening peak hour	56	139	195 [5]
	24hrs flow	813	815	1628 [66]
Doc 4 & Doc 6 week 2	morning peak hour	149	47	196 [5]
	evening peak hour	39	141	180 [1]
	24hrs flow	788	806	1594 [55]
All docs 14 days averages	morning peak hour	149	46	195 [5]
	evening peak hour	48	140	188 [3]
	24hrs flow	801	811	1612 [61]

6. So, taking account of the average weekday figures over the fourteen day count period, the following comparison emerges for 2010 flows v 2014 flows.

year	survey period	vehs in	vehs out	2 way flow [hgv]
2010	morning peak hour	114	59	173 [16]
2014	morning peak hour	149	46	195 [5]
2010	evening peak hour	41	151	192 [3]
2014	evening peak hour	48	140	188 [3]
2010	24hrs flow	795	802	1597 [112]
2014	24hrs flow	801	811	1612 [61]

7. On the above basis,

- a) there has been a 13% increase in morning peak hour flows;
- b) there has been a 2% decrease in evening peak hour flows;
- c) there has been a 1% increase in daily flows; and,
- d) there has been a 45% decrease in daily hgv flows.

8. This indicates that there has not been any material increase in daily vehicle flows at the site over a (nearly) four year period, but there has been an increase in concentration of those flows during the morning peak hour, with a slight reduction in evening peak hour flows. There has been a significant reduction in daily hgv flows.

9. As will be seen, from point 6, this increase in morning peak hour flows is made up of:
- | | | | |
|----|-------------------------------------|---------|---------|
| a) | an increase in inbound flows of | +35 vph | and, |
| b) | a decrease in outbound flows of | -13 vph | giving, |
| c) | an overall increase in two flows of | +22 vph | |
10. Considering the 13% increase in the morning peak hour flows, and using the future assessed vehicle flows and proportions for the morning peak hour (from KAB 26 - also attached) from the 2010 TA, will result in an increase in the assessed future vehicle flows, on the five arms of the existing roundabout, as follows:
- | | | | |
|----|-----------------|-------------|--------|
| a) | B1069 | [27 x 0.13] | 4 vph |
| b) | Redwald Road | [1 x 0.13] | 0 vph |
| c) | Acer Road | [7 x 0.13] | 1 vph |
| d) | A1152 | [37 x 0.13] | 5 vph |
| e) | Bentwaters Park | [72 x 0.13] | 10 vph |
11. Clearly, these are increases in the future additional vehicle flows of a low order, and are not at any material level. Overall, when one takes into account that, in practical terms;
- a) there has not been any increase in daily vehicle flows at the site;
 - b) there has not been any change in evening peak hour flows;
 - c) there has been a significant decrease in daily hgv flows; and,
 - d) even though there has been a small increase in vehicle numbers during the morning network peak hour, even then, the future assessed flows for that peak hour will not be materially increased,
- then, it follows that no changes need to be made to the TA submission, which remains valid.
12. On the basis of the information submitted in this update note, the conclusions of the 2010 Transport Assessment remain the same i.e.

There will not be any material increase in vehicle flows on the adjacent highway network, and the total vehicle flows will not exceed the baseline flows set by the County Council.

Keith A. Berriman – Director – The HTTC Ltd.

Your ref:

My Ref:
KAB/10/B/01

Date:
13/02/14

**BRIEF SUPPLEMENTARY
TRANSPORT ASSESSMENT**

**IN RESPECT OF AN APPLICATION FOR
CHANGE OF USE OF BUILDINGS AND LAND
AT
THE FORMER BENTWATERS AIR BASE.**

Report of:
Keith A. Berriman

Page 1 of 8

**Director
Keith A. Berriman I.Eng., FIET, FIHE, FCIHT, CMILT**

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1.00	INTRODUCTION & HIGHWAY ISSUES.	4.
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KEITH ANTHONY BERRIMAN - EXPERIENCE & QUALIFICATIONS.

I am an Incorporated Engineer, a Fellow of the Institution of Engineering & Technology, a Fellow of the Institute of Highway Engineers, a Fellow of the Chartered Institution of Highways & Transportation, and a Chartered Member of the Institute of Logistics and Transport.

I have been engaged in the practise of highway and traffic engineering for nearly forty years, specifically in relation to considering and advising upon development proposals.

I have worked in both the public and private sector since 1975, and have been an independent consulting engineer since 1988.

I provide specialist highway, traffic and transport advice to developers, Local Authorities, planning consultants, architects, and engineering consultants, on the highway, traffic and transport aspects of all development proposals.

I have advised on all types of development proposals including, residential, commercial, leisure, education, retail, and roadside services developments: having advised on small and large examples of such projects.

Over the years, I have given highway and traffic evidence at many public inquiries, including Section 78 inquiries. Local Plan Inquiries, and Roads Inquiries.

Formerly, I was Head of Highways Development Control at Essex County Council. I am now Director of The Highway Traffic & Transport Consultancy Ltd (The HTTC Ltd).

I have carried out investigations, for the purposes of providing this report.

Keith A. Berriman
I.Eng., FIET, FIHE FCIHT, CMILT.

1.00 INTRODUCTION.

1.01 This Supplementary Transport Assessment (STA) document considers the changes in the highway, traffic and transport issues, which may have occurred since the submission of the original TA in 2010. The TA relates to the proposed change of use of buildings and land at the former Bentwaters Air Base. This STA should be read in conjunction with the 2010 TA, and other documents submitted by the applicant's planning adviser, Evolution Town Planning. All references to appendices beginning with "KAB", are references to appendices in the 2010 TA.

1.02 The appendices from the original 2010 TS (KAB 4 & 5) confirmed that the A1152, and its north eastern extension, the B1069, are identified as part of the Suffolk lorry route network, being a

Zone Distributor Lorry Route – i.e. Roads within a zone serving as a route to a location or as a route to local access routes (see KAB 5 – Introduction).

This remains the situation in 2014, and as such, this route has been targeted by the County Highway Authority (CHA) as being adequate to:

accommodate lorries safely and to minimise their impact on roads, other than on the main network, by discouraging the use the use of minor roads except for essential movements (see KAB 5 – Objectives of the plan).

1.03 The 2010 TA concluded:

there will not be any material increase in vehicle flows on the adjacent highway network, and the total vehicle flows will not exceed the baseline flows set by the County Council.

1.04 This conclusion, and arguments set out in the TA, and in subsequent documents, were accepted by the County Highway Authority (CHA), which raised no objections to the proposals.

1.05 The purpose of this STA is to note various new and amended documents which are now submitted to assist in the submission of an update to the Environmental Statement (ES), as requested by the LPA. Consequently, the section of the ES which relates to highway, traffic and transport issues has been amended in line with these documents.

1.06 For highway purposes, the new document is the HTTC document, "Update note – 2014 traffic volumes - Bentwaters Park access", which has been produced and is submitted with the updated EA document. This note updates the vehicle flow data relating to the vehicle flows using the access to Bentwaters Park, and assesses if that new data will have any material impact on the considerations of the 2010 TA.

1.07 The update note concludes as follows.

Clearly, these are increases in the future additional vehicle flows of a low order, and are not at any material level. Overall, when one takes into account that, in practical terms;

- a) there has not been any increase in daily vehicle flows at the site;*
- b) there has not been any change in evening peak hour flows;*
- c) there has been a significant decrease in daily hgv flows; and,*
- d) even though there has been a small increase in vehicle numbers during the morning network peak hour, even then, the future assessed flows for that peak hour will not be materially increased.*

Hence it follows that no changes need to be made to the TA submission, which remains valid.

12. *On the basis of the information submitted in this update note, the conclusions of the 2010 Transport Assessment remain the same i.e.*

There will not be any material increase in vehicle flows on the adjacent highway network, and the total vehicle flows will not exceed the baseline flows set by the County Council.

1.08 On the above basis, this STA can confirm that the conclusions of the original 2010 TA still remain correct, and are repeated in the following section.

2.00 CONCLUSIONS.

- 2.01 The A1152, and its north eastern extension, the B1069, are identified as part of the Suffolk lorry route network, being a *Zone Distributor Lorry Route – i.e. Roads within a zone serving as a route to a location or as a route to local access routes*. As such, this route has been targeted by the County Highway Authority (CHA) as being adequate to: *accommodate lorries safely and to minimise their impact on roads, other than on the main network, by discouraging the use of minor roads except for essential movements*. The application site takes direct access to that route.
- 2.02 A meeting with the CHA resulted in the updating of earlier guidance and advice to the Local Planning Authority, and set out an agreed way forward by which the TA would be properly informed. The TA has followed this agreed way forward.
- 2.03 One of the main issues to be advanced by the CHA, was the use of a data spreadsheet which set out the CHA's calculations of the agreed baseline vehicle flows which the site already generates, and, which it considers are capable of being accommodated on the local road network. The SCC position is that, *This should be the baseline upon which any further change of use, and hence change of traffic, is judged*.
- 2.04 Bentwaters is unusual in transport assessment terms, since it is often the case that large gfa's produce large vehicle flows. This is not the case at Bentwaters because much of the gfa is taken up with uses which do not (or will not) produce large vehicle flows, such as B8 (storage only) uses. Indeed, a number of uses result in the removal of hgv flows from the local road network.

- 2.05** A detailed traffic survey was carried out of vehicle flows at the Bentwaters site, on the surrounding roads, and through Eyke village. Using this data, and data confirming which site uses were operational at the time of the survey, a calculation was made of the “worst case” peak hour and daily flows at the site access, and on the adjacent road network. The “best case” (lower) flows are some 50% less, but, only the worst case flows are considered in the TA, as a realistic 85th %ile test.

[NB – as set out in the 2014 STA, the survey data for the site access has been updated.]

- 2.06** These figures demonstrate that the CHA’s spreadsheet, baseline flows are not exceeded, and, as such, there will not be any material increase in vehicle flows over the CHA’s baseline flows. On that basis, no adverse highway capacity or highway safety arguments can be advanced. Hence, no legitimate highway objections can be raised against the proposals.

- 2.07** Notwithstanding this conclusion, further work has been submitted to consider matters such as: actual vehicle flows through Eyke village; traffic calming possibilities in Eyke village; travel plan proposals; the historical and current accident records; and, specific hgv accident records.

- 2.08** Whilst there has been much previous mis-information in terms of traffic data, the current data is clear in demonstrating that the proposals are acceptable in highway, traffic and transport terms.

Enclosure 2

Your Ref: DC/17/5380/OUT
Our Ref: 570\CON\0258\18
Date: 23/03/18
Highways Enquiries to: ben.chester@suffolk.gov.uk

All planning enquiries should be sent to the Local Planning Authority.

The Planning Officer
Suffolk Coastal District Council

For the Attention of: Graham Nourse

Dear Graham

TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN DC/17/5380/OUT

PROPOSAL: Outline Planning Application for up to 290 dwellings, Car Parking, Open space, Including the provision of Allotments with Associated Infrastructure and Access

LOCATION: Land On, Redwald Road, Rendlesham

ROAD CLASS: B

Notice is hereby given that the County Council as Highway Authority make the following comments:

Further to receiving a Technical Note from the applicant's transport consultant on 22nd March 2018, the following comments are made setting out the latest position of the Highway Authority with regard to the above proposal. Comments are also made to clarify the position of the Highway Authority on the proposed mitigation at Melton crossroads.

1. Junction Modelling: The additional modelling of the A1152 Orford Road / B1083 Roundabout has identified that the A1152 Orford Road arm would be approaching operational capacity in the '2022 with development' scenario. The applicant has proposed widening of this arm to increase capacity. We would require these works to mitigate this impact on this junction to make the development acceptable to the Highway Authority. The other modelled junctions are acceptable following submission of the information requested. Please see comments overleaf relating to Melton crossroads.
2. Access Layout: The amendment to provide the secondary emergency access onto Redwald Road (shared with the pedestrian/cycle route) is acceptable in principle subject to details of the measures to prevent non-emergency vehicle usage. The main vehicular access is acceptable subject to minor amendments to provide space for services and provide visibility on the northern side.
3. Pedestrian Crossing Facilities: The proposed pedestrian crossing facilities on Redwald Road and Acer Road are acceptable.

4. Speed Limit: The acceptance of the speed limit reduction contribution is welcomed and agreed.
5. Travel Plan Comments: The SCC Travel Plan officer has provided comments overleaf.
6. PROW Comments: The acceptance of the PROW contribution is welcomed and agreed.
7. Passenger Transport: The SCC Travel Plan officer has provided comments on the passenger transport provision overleaf.
8. Framework Travel Plan: The SCC Travel Plan officer has provided comments overleaf.

Melton Crossroads:

In the view of the Highway Authority, the proposed mitigation scheme to widen the A1152 Wilford Bridge Road and A1152 Woods Lane arms mitigates the impact of this proposal on the junction. This is the reason for acceptance by the Highway Authority. The mitigation scheme may not provide capacity improvements that would enable the impact of other developments to be accommodated, other than background growth. This is due to the limited highway area available at the junction.

The previously accepted modelling of the junction did not include allocated sites, only those that we considered 'committed' (permitted sites).

We carried out sensitivity testing during the assessment of the above mitigation that identified that the combined impact of this site, recently refused Yarmouth Road, Melton site and the allocated site at Wilford Bridge may push the junction beyond its operational capacity despite the proposed improvements. This was based on estimated traffic flows of the allocated site so cannot be relied upon with great confidence.

SCC Travel Plan Comments:

The Framework Travel Plan response in Appendix I of the Technical Note (dated 22nd March 2018) has addressed the majority of the Travel Plan concerns in regards to the implementation and monitoring of it. The inclusion of the additional pedestrian and cycle access point to Redwald Road will improve the active and sustainable transport links to the existing Rendlesham amenities. Nevertheless, it has not addressed the issues with the opportunities to use the bus for commuting purposes, as the existing services for the buses serving the nearest bus stop would not be suitable for commuting purposes, which will provide no alternative to commute to and from the site by private motor vehicle. The suggestion that residents could cycle to Wickham Market rail station and use the cycle parking provided at the station is possible, however not all residents would be willing to undertake this on a daily basis, as it would be more convenient and quicker for them to use the car to travel to the destinations that Wickham Market rail station serves. Also the cycle parking that is provided at the station may not be suitable for long-stay cycle parking, as it may not be perceived as being secure and weatherproof, where no measures have been identified in the Travel Plan to help overcome these issues.

However, in highway terms the traffic modelling is robust and there would not be a 'severe' highway impact in the event that the Travel Plan fails to reduce the number of vehicular trips. There should still be some remedial measures identified in the Travel Plan secured through suitable S106 obligations to ensure the predicted trip rates are not exceeded when the site has been occupied.

If consent is granted at the Planning Committee, the actions stated in the Technical Note must be incorporated into a revised Travel Plan to either be secured prior to the signing of the Section 106 agreement, or an obligation to submit a revised Travel Plan prior to commencement of the development. The obligations needed were identified in the original SCC Highway response (dated 6th February 2018).

Yours sincerely,

Mr Ben Chester
Senior Development Management Engineer
Strategic Development

Enclosure 3

Suffolk Coastal District Council
First Draft Local Plan Consultation
2018

**Representations in Respect of Policy SCLP12.57: Land
West of Garden Square Rendlesham**

September 2018



RTPI

Winner 2015
RTPI East of England
Award for
Planning Excellence



Opus House
Elm Farm Park
Thurston
Bury St Edmunds
Suffolk
IP31 3SH

T 01359 233663
E enquiries@evolution-planning.co.uk
W evolution-planning.co.uk

Suffolk Coastal District Council First Draft Local Plan Consultation

Representations in Respect of Policy SCLP12.57: Land West of Garden Square
Rendlesham

Reference: E382.C1.Rep05

1.0 Representations in Respect of Policy SCLP12.57: Land West of Garden Square Rendlesham

- 1.1 These representations have been submitted on behalf of Capital Community Developments. These representations object to Planning Policy SCLP12.57: Land West of Garden Square Rendlesham. The policy allocates the site for housing. The principle of the allocation of the site for housing is supported. The objection is that the site should be allocated for 75 homes and not 50 homes.
- 1.2 The site is identified in the current Local Plan and referred to as site SSP12 and is allocated for housing development. The Local Plan states that the site has been identified by the District Council as appropriate for approximately 50 dwellings. The Local Plan allocates approximately 100 homes to Rendlesham as its contribution to the overall minimum housing requirements across the district. The Local Plan also says that *“the village [of Rendlesham] has capacity to accommodate more than the 100 homes proposed”*.
- 1.3 During 1996-2013 the site had a Local Plan allocation of 75 homes. This allocation was reduced in the current Local Plan to 50 units on the grounds of transport impact and the need for a cordon sanitaire around the sewerage works. Subject to the resolution of these constraints there should be no reason why the site cannot accommodate 75 homes.
- 1.4 Rendlesham is a sustainable location for housing it is classified as a Large Village in the Settlement Hierarchy of the First Draft Local Plan. This draft Local Plan states (paragraph 12.424): *“Rendlesham is a Large Village in the settlement hierarchy which is altogether larger, and contains a much wider variety of facilities than is common to most other Large Villages in the District given its historic legacy as a former US Airforce base.”* The village of Rendlesham is also next to the large employment site that exists on the former US Airforce base. This offers the potential for homes and places of work to be located close to each other improving the sustainability of the locality. Rendlesham is therefore a sustainable location for new housing.
- 1.5 Rendlesham is on the edge of the Area of Outstanding Natural Beauty (AONB). The AONB designation constrains the delivery of housing within it on landscape grounds. Rendlesham is a good location outside of the AONB where housing can be provided to serve this area.

- 1.6 The First Draft Local Plan identified two constraints to the allocation of more than 50 homes on the site. These are set out in paragraph 12.427 which states: *"The village 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."*
- 1.7 Paragraph 12.430 states: *"The site allocated as SCLP12.58 is the northern of the two sites identified on the plan above. The main limiting factors in respect of this site are its proximity to the Water Re-cycling Centre (sewage treatment works) which requires the provision of a 'cordon sanitaire', and the sewers that cross the site. The minimum distance for the cordon sanitaire will be a matter for discussion with Anglian Water as will any layout issues linked to the alignment of the sewers. The number of homes and the area on which development could take place has therefore been reduced to approximately 50."*
- 1.8 A recent planning application on the site reference. DC/18/2374/FUL, proposed the residential development of 75 homes, car parking, open space, hard and soft landscaping and associated infrastructure and access. This application was refused on the 6th September 2018. The planning application was not refused because of highways issues or because of issues with the Water Re-cycling Centre. The reasons for refusal identified that the additional 25 homes were above the current Local Plan allocation, concerns were raised over the design and layout, and the application lacked a completed S.106 agreement at the date of refusal. The decision notice is included in Appendix 1.
- 1.9 None of the reasons for refusal would prevent the new Local Plan allocating the site for 75 homes. Design issues and a S.106 agreement can be addressed at the planning application stage.
- 1.10 We attach at Appendix 2 the masterplan from the planning application DC/18/2374/FUL. The purpose of including this plan with these representations is to demonstrate that 75 homes can be accommodated on the site without conflict with the Water Re-cycling Centre and in a manner that is acceptable to Suffolk County Highways.
- 1.11 In response to the planning application Suffolk County Highways stated: *"I am satisfied that the development will not negatively impact upon the highway network with regard to traffic flows."*
- 1.12 Rendlesham Parish Council is a parish with considerable experience of planning. They have a Made Neighbourhood Plan. The Parish Council supported the planning application and made no objection to the number of homes proposed on the site.

- 1.13 The National Planning Policy Framework (The Framework) states in paragraph 77 that: *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.”* The support from the Parish Council is evidence that that developing 75 homes would meet local needs. Paragraph 78 of The Framework states that: *“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”* Developing in Rendlesham would support services in nearby villages where housing growth is constrained by the AONB or other issues.
- 1.14 The revised Framework (July 2018) includes a new set of policies that were not included or as clearly emphasised or set out in the 2012 version. These policies start with paragraph 122 and state that: *“Planning policies and decisions should support development that makes efficient use of land, taking into account:*
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
 - b) local market conditions and viability;*
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
 - d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
 - e) the importance of securing well-designed, attractive and healthy places.”*
- 1.15 There is nothing that has been highlighted in the consideration of the recent planning application which demonstrates that if the site is allocated for 75 homes that the criteria (a) to (e) cannot be met.
- 1.16 The site is approximately 5 hectares in size. Developing 75 homes on the site, as the masterplan shows, would leave a considerable area for open space, and wildlife corridors and walking routes can be created around the site.

- 1.17 The site is well screened from the surrounding area and is well related to the built up area of Rendlesham. The site is relatively flat and bounded by woodland on the north and west boundaries and residential development on the east and south boundaries. Further to the north, beyond the woodland, the predominant land use is agricultural. Just to the north of the site is the Water Re-cycling Centre. The site is shown on the photograph below. There are therefore no design or landscape reasons why the site could not be allocated for 75 homes.



- 1.18 Allocating the site for 75 homes would:

- Make more efficient use of land on an allocated housing site where there are no constraints to the increase to 75 homes.
- Boost the supply of housing in line with the policies of The Framework.
- The sustainable location of the site within the settlement boundary of a key service centre/large village.
- Have very limited environmental or landscape impacts.
- Contribute towards local infrastructure through the Community Infrastructure Levy.
- Provision of significant on-site pedestrian links to the wider village and village centre.
- Be an efficient use of land and an appropriate development density which reflects local development density.

- 1.19 In response to the recent planning application there were no objections from many consultees to the proposal for 75 homes as set out below:

- Suffolk County Highways stated: *"I am satisfied that the development will not negatively impact upon the highway network with regard to traffic flows."*
- Environmental Protection: Had objections to the application, and recommended that a condition was added to ensure that any unexpected contamination that was found or suspected on the site must be reported in writing immediately to the Local Planning Authority, including its remediation and mitigation.
- Landscape Officer: There was no objection to the application as there would not be any significant adverse landscape or visual impacts arising from this proposal, it was advised that full landscape enhancement proposals should be secured by Condition.
- Environment Agency: They did not know why they were consulted on the application.
- Suffolk County Council Flooding Authority: There was no objection to the application subject to conditions.
- Suffolk County Council Development Contributions Manager: Apart from any site-specific matters to be secured by way of a planning obligation or planning conditions, there would be a future bid to Suffolk Coastal District Council for CIL funds if planning permission was granted and implemented.
- Suffolk Constabulary objected on design grounds, however the issues can be resolved by the development management and detailed design process.
- Suffolk County Council Archaeology: Had no objection subject to conditions.
- Anglian Water: Conditions and Informatives were requested to be added to any decision notice, if the application was to be recommended for approval.
- Suffolk County Council Rights of way had no objection in principle subject to the creation of appropriate pedestrian and cycling links.
- NHS England Midlands and East had no objection.

- Natural England would be happy with the scheme subject to the appropriate mitigation of the recreational disturbance impacts of the development. This would be addressed through S.106 or District wide measures.

1.20 In summary there are no constraints to the increase in the allocation from 50 to 75 homes. Such an allocation would be:

- Positively Prepared as it would meet the housing needs of the village and the wider area.
- Justified – allocating the site for 75 homes would be an appropriate strategy for an allocation as it would be well related to the built up area and has good road vehicular access with no constraints to development for that number of homes.
- The allocation would be Effective and deliverable as there is developer interest in building in Rendlesham.
- The allocation for 75 homes would be more consistent with national planning policy which supports development in rural areas and the efficient use of land.

1.21 We therefore support the allocation of the site for housing and object to the number of homes proposed which should be increased from 50 to 75.

Enclosure 4

Your Ref: DC/18/2374/FUL
Our Ref: 570\CON\2738\18
Date: 12/07/18
Highways Enquiries to: ben.chester@suffolk.gov.uk

All planning enquiries should be sent to the Local Planning Authority.

The Planning Officer
Suffolk Coastal District Council

For the Attention of: Jane Rodens

Dear Jane

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN DC/18/2374/FUL**

PROPOSAL: Proposed residential development of 75 dwellings, car parking, open space, hard and soft landscaping and associated infrastructure and access.

LOCATION: Land to the North & west of Garden Square &, Gardenia Close, Rendlesham, Woodbridge, Suffolk

ROAD CLASS: U

Notice is hereby given that the County Council as Highway Authority make the following comments:

1. Development related vehicle flows and highway impacts: With regard to section 5 of the supplied Transport Statement, it is noted that the calculated peak hour vehicle trip rates are very low due to the travel patterns of occupiers of the surveyed area. As no guarantees appear to be provided about the occupiers of the proposed dwellings (whether they will share the same travel patterns as the surveyed area in perpetuity), a robust assessment of the impacts should be provided using another method such as TRICS data. It is noted that we would expect peak hour 2-way vehicular trip rates of around 0.6 per dwelling in this location.
2. Development Layout: The layout of the development roads and footways do not provide adequate pedestrian provision within the site (relating to NPPF para. 35) due to a lack of footway provision and subsequently, would not be suitable for adoption by the Highway Authority. Whilst shared surface roads do not require footways, the other access roads should benefit from footways on both sides. In addition, the Highway Authority would not consider the proposed layout for adoption due to junction spacing, lack of visibility from junctions, centre line radius, road width, lack of clarity over road types, lack of service strips and junction access radii.

3. Highway Access: It is noted that there is one proposed direct highway access point onto Tidy Road. The proposed access point to Garden Square does not link directly to the highway as Garden Square is not an adopted road. The access onto Tidy Road and the junction of Garden Square with Sycamore Drive are considered adequate to serve a development of this scale.

Please consider this a holding objection until points 1 and 2 are addressed. Highway related planning conditions will be necessary and will be supplied once the above comments are addressed.

The following comments were received from SCC Travel Plan Officer; SCC Public Rights of Way team and; SCC Passenger Transport:

SCC Travel Plan Officer:

Should the proposal be permitted, the following conditions are recommended:

Condition: Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Pack (RTP). Not less than 3 months prior to the first occupation of any dwelling, the contents of the RTP shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include walking, cycling and bus maps, latest relevant bus and rail timetable information, car sharing information, personalised travel planning and a multi-modal travel voucher.

Reason: In the interests of sustainable development and health objectives as set out in the NPPF, and policy DM20 of the Suffolk Coastal District Local Plan Core Strategy & Development Management Policies (2013)

SCC can design and produce a travel pack on behalf of the applicant provided that a suitable Section 106 contribution can be agreed.

Condition: Before the development hereby permitted is occupied full details of the electric vehicle charging points to be installed in the development shall have been submitted to the Local Planning Authority and approved in writing.

Reason: To ensure that the development makes adequate provision for electric vehicle charging points to encourage the use of electric vehicles in accordance with paragraph 3.4.2 of the Suffolk Guidance for Parking and paragraph 35 of the National Planning Policy Framework.

SCC Public Rights of Way team:

Should the proposal be permitted, the following S106 contribution is requested:

We would like to request that a bridleway be created along the track which runs along the eastern side of the site, as this would link the estate to the wider countryside. The Rendlesham estate is currently poorly served in terms of public rights of way and access to the countryside, therefore we feel that this link would help to fill that gap for this development and the wider estate.

Estimated Costs:

Compensation £3,337.50
Staff and design time 12% £400.50
Contingency 10% £333.75
Order-making costs £4,000
Total £8,071.25

SCC Passenger Transport:

Should the proposal be permitted, the following S106 contribution is requested:

This site could be served by residents walking through to the current routes and not need additional infrastructure, but it would also make sense to add Sycamore Drive – that is already covered by a school route and has stops in place built when the roads were and just not used up to now. For me, as a minimum, I would request a £15k contribution for a solar-powered real time screen at the stop on Redwald Road opp Sparrowscroft Road as that already has a shelter and would be the best bet for walking to from this site. If Sycamore Drive is going to be used there is space for a shelter and screen at the stop there opposite Gardenia Close – which would be another £20k.

Yours sincerely,

Mr Ben Chester
Senior Development Management Engineer
Strategic Development

From:d.c.admin
Sent:03 August 2018 15:38
To:pbc
Subject:FW: DC/18/2374/FUL - 75
DWELLINGS - RENDLESHAM - SP12 - KAB
to BC -
240718

From: Jane Rodens
Sent: 03 August 2018 15:27
To: d.c.admin
Subject: FW: DC/18/2374/FUL - 75
DWELLINGS - RENDLESHAM - SP12 - KAB
to BC - 240718

Hello,
Can this be added to DC/18/2374/FUL
Thank you
Jane

From: Ben Chester
[mailto:Ben.Chester@suffolk.gov.uk]
Sent: 30 July 2018 14:01
To:

[REDACTED] Hardy';
'Jeanie'; Jane Rodens; Chris Ward
Subject: RE: DC/18/2374/FUL - 75
DWELLINGS - RENDLESHAM - SP12 - KAB
to BC - 240718

Dear Keith,
Thank you for the responses to my
queries.
I am satisfied that the development
will not negatively impact upon the
highway network with regard to
traffic flows. Thank you for the
additional assessment.
I will await contact from the
applicant/designer with regard to the
internal site layout roads and
footways.
Travel Plan query comments provided
by SCC Travel Plan officer (copied
in):
In answer to the questions raised by
the consultant:

*The Multi-modal voucher should be to the value of two one month bus tickets from the site to Ipswich. Current fare information can be found on <https://www.firstgroup.com/norfolk-suffolk/tickets/ticket-prices>. If the resident does not want to redeem the bus tickets, a cycle voucher of equivalent value should be offered to the resident instead.
*I can confirm that no Residential Travel Plan was requested by SCC or is required in our opinion, as developments less than 100 in Suffolk should be focused on delivering upfront measures (i.e. provision of information and one-off sustainable transport measures) instead of committing to a long-term management strategy. This links in with the best practice for the concept of the Travel Plan Statement for developments between 50-80 dwellings in the DFT "Delivering Travel Plans Through the Planning Process" guidance.

I am awaiting responses from our Passenger Transport and PROW officers regarding their S106 contribution requests. I will forward these as I receive them.

Kind Regards

Ben Chester

Senior Development Management
Engineer (East Suffolk)
Growth, Highways and Infrastructure
Suffolk County Council, Endeavour
House, 8 Russell Road, Ipswich, IP1
2BX

Office: 01473 260433

Mobile: 07860 830865

Email: ben.chester@suffolk.gov.uk
From: Keith Berriman - The HTTC Ltd.
<kab@the-httc.co.uk>
Sent: 24 July 2018 16:50
To: Ben Chester
<Ben.Chester@suffolk.gov.uk>
Cc: 'Steven'
<Steven@evolution-planning.co.uk>;
'Anthony Hardy'
<ahardy@ccdevelopments.co.uk>;
'Jeanie' <[REDACTED]>

<Jane.Rodens@eastsuffolk.gov.uk>
Subject: RE: DC/18/2374/FUL - 75
DWELLINGS - RENDLESHAM - SP12 - KAB
to BC - 240718
Importance: High

Dear Ben,
Please find below an email from Jane Rodens, of the LPA, referring to your letter of 12th July 2018 (copy attached for reference).
Please also find attached, my responses to your queries. I trust that these will be adequate for your purposes.
As indicated, I would welcome your further advice on these matters, and hope that you can now confirm that no highway objections are raised against the proposal, subject only to your further discussions, direct with the applicant, about the internal layout (see point 4. of the letter).
I am afraid that I will now be away from the office until next Thursday, but, will be happy to contact you on my return, if you feel that is necessary.

Kind Regards,
Keith.
The HTTC Ltd.
The Highway Traffic & Transport
Consultancy
Registered in England & Wales -
Company No. 5652127
Director - Keith A. Berriman I.Eng.,
FIET, FIHE, FCIHT, CMILT
The HTTC Ltd. - 2, Keeble Close,
Tiptree, Essex. CO5 0NU (Registered
Office).
tel. 01621 818505

e-mail - k[REDACTED]
www.the-httc.co.uk
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transmitted by this e-mail.
The HTTC Ltd. cannot accept any
liability for the integrity of this
message or its attachments.
From: Steven
[mailto:Steven@evolution-planning.co.uk]
Sent: 18 July 2018 16:26

To: Jane Rodens
Subject: RE: DC/18/2374/FUL
Good afternoon Jane,
Further to our telephone conversation
earlier we are already aware of the
CHA response and are
dealing.
Regards,
Steven Bainbridge MSc MRTPI
Associate
Evolution Town Planning Ltd.
Opus House Elm Farm Park Thurston
Bury St Edmunds Suffolk IP31 3SH
T: 01359 233663 M: 07803 505258
www.evolution-planning.co.uk
From: Jane Rodens
[mailto:Jane.Rodens@eastsuffolk.gov.uk
]
Sent: 18 July 2018 11:37
To: Steven
<Steven@evolution-planning.co.uk>
Subject: DC/18/2374/FUL
Hello,
I have received the attached comments
from Suffolk County Council Highways,
would it
be possible to provide the additional
information to myself.
Regards
Jane Rodens BA (Hons) MA MRTPI
Area Planning and Enforcement Officer
Planning
Suffolk Coastal and Waveney District
Councils
Tel: (01394) 444505
Mobile: 07919303788
Jane.rodens@eastsuffolk.gov.uk
Suffolk Coastal and Waveney District
Councils are working as a partnership
and all
emails received from us will use the
@eastsuffolk.gov.uk email address
www.eastsuffolk.gov.uk

www.twitter.com/eastsuffolk |
www.facebook.com/eastsuffolkcouncil
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must you copy or show them to anyone;
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this email has been created in the
knowledge that Internet
email is not a 100% secure
communications medium. We advise that
you understand and accept
this lack of security when emailing
us.
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to ensure that this email and
attachments are free from
any virus, we advise that in keeping
with good computing practice the
recipient should ensure
they are actually virus free.
This message has been scanned for
malware by Websense.
www.websense.com
Emails sent to and from this
organisation will be monitored in
accordance
with the law to ensure compliance
with policies and to minimise any
security risks.
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Enclosure 5



Enclosure 6

Aerial photo showing blocks of woodland west and north of site.



Ground level photo taken from the end of Gordon Square looking west to the woodland.



Aerial photo looking east.



Aerial photo looking north.



Suffolk Coastal Local Plan Review Examination Hearings

Matter 3 – Area Specific Strategies – Development Allocations

Hearing Statement on Behalf of Capital Community Developments Ltd. Responding to Inspector's Questions in Respect of Emerging Policy SCLP12.62 Land West of Garden Square, Rendlesham

Norfolk Office 01603 516319

Orchard House
Hall Lane
East Tuddenham,
Norfolk, NR20 3LR

Suffolk Office 01284 336348

The Northgate Business Centre,
10 Northgate Street,
Bury St Edmunds,
Suffolk, IP33 1HQ

Essex Office 01245 934184

Moulsham Mill,
Parkway,
Chelmsford
Essex, CM2 7PX

Information

Date	July 2019
Site Address	Policy SCLP12.62 Land West of Garden Square
Development Description	Hearing Statement – Matter 3
Local Planning Authority	Suffolk Coastal District Council
Representer	Parker Planning Services Ltd. on behalf of Capital Community Developments Ltd.

Author: Steven Bainbridge MRTPI

Principal Planning Manager (Suffolk)

Report Revision:1

Contents

1. Introduction/Foreword
2. Answers to General Questions Relevant to all Proposed Site Allocations
3. Answer to Question 3.85 - Would criterion a) be effective in safeguarding the operation of the Rendlesham Water Recycling Centre and provide adequate living conditions for future residents of the site?
4. Answer to Question 3.86 - Is the figure of approximately 50 dwellings at the site justified?

1 Introduction

- 1.1 This Hearing Statement has been prepared by Parker Planning Services Ltd. and follows submissions made at previous stages of this local plan's preparation.
- 1.2 In the absence of compelling evidence we are of the opinion that it would be **justified** to increase the quantum of development back up to the previous level of 75 dwellings as this would be an **effective** and efficient use of land making the allocation **consistent with national policy** and would better contribute to the local planning authority meeting its housing needs on a sustainable site within a sustainable settlement.
- 1.3 The author of this Statement has a long professional history of working on planning matters in the Rendlesham area and is therefore well placed to aid the Inspector in discussing matters related to Rendlesham at the hearing. Those planning projects include:
- 2009 planning permission for a 2mw anaerobic digestion renewable energy plant in Rendlesham.
 - 2010 the East of England Royal Town Planning Institute planning award for the renewable energy plant.
 - 2011 planning permission for a waste soils processing site at Bentwaters (Rendlesham).
 - 2017 local plan allocation for the same 'waste' site in the Suffolk County waste local plan.
 - 2013 planning permission for the Bentwaters 'masterplan' which was a decade-long project for the regularisation and reuse of most of the buildings on the former airfield and included reopening the runway to general aviation and a site-specific local plan policy followed.
 - 2014 planning permission for a 4mw anaerobic digestion plant at Bentwaters replacing the earlier one.
 - 2015 planning permission for a large agricultural processing facility on Bentwaters (Rendlesham).

- 2019 planning permission for an extension to the large agricultural processing facility.
- 2015 appearing at the local plan examination supporting necessary amendments to the Bentwaters site-specific policy SSP24.
- 2018/19 planning application for 75 houses in Rendlesham.
- 2013 to 2015 advised the Parish Council on the Rendlesham neighbourhood plan (a government front runner and RTPI award winner) and wrote the central policy RNPP1.
- 2013 to 2015 advised the parish council on resisting a planning application for 50 houses in the district centre and thus saving the heart of the village for the future.
- 2017 planning permission for an 18m tall film studio complex at Bentwaters in the AONB.

1.4 Members of Capital Community Development Ltd (the prospective developers of the SCLP12.62 site) have lived in Rendlesham for many years and have a successful track record of having already built out the Garden Square and Gardenia Close development adjacent to site SCLP12.62.

1.5 Our client's **Soundness** concerns relate to the reduction in the quantum of housing allocated to this site and the lack of evidence justifying that reduction by the local planning authority.

1.6 In the absence of compelling evidence we are of the opinion that it would be **justified** to increase the quantum of development back up to the previous level of 75 dwellings as this would be an **effective** and **efficient use of land** making the allocation **consistent with national policy** and would better contribute to the local planning authority meeting its housing needs on a sustainable site within a sustainable settlement.

2 General Questions Relevant to all proposed site allocations

Is each site allocation and its criteria justified and appropriate in all aspects, having regard to the likely impacts of the development and potential constraints?

- 2.1 The criteria of emerging policy SCLP12.62 are largely the same as the criteria within its adopted predecessor policy SSP12 (see pages 45 to 48 of exam library document F2) of which our clients were supportive. The two policies are provided side by side for ease of reference in Appendix 1 of this statement.
- 2.2 The criteria within policy SSP12 have been responded to in a recent planning application (ref. DC/19/1499/FUL) and provided no obstruction to the preparation and submission of that planning application.
- 2.3 The local planning authority have added a new criterion (i) to the emerging policy. It requires that “Evidence is required to demonstrate there is adequate provision for treatment at the Water Recycling Centre or that this can be provided”.
- 2.4 In response to this Matter Question we point to Appendix 2 of this Statement where the ‘evidence’ can be found that there is adequate capacity at the WRC in question.
- 2.5 The evidence provided is in the form of a consultation response by Anglia Water of 9th May 2019 to the recent planning application where AW say: “The foul drainage from this development is in the catchment of Rendlesham Park Water Recycling Centre that will have available capacity for these flows” and “The sewerage system at present has available capacity for these flows via a direct connection to the Water Recycling Centre”.
- 2.6 In terms of criterion a) of the emerging policy this is the subject of a Question by the Inspector and is dealt with in Section 3 below.

Are there any significant factors that indicate any of the sites should not be allocated? Is there a risk that site conditions, infrastructure or access requirements or constraints, might prevent development or adversely affect viability and delivery?

2.7 We are not aware of any significant factors which indicate Site SCLP12.62 should not be allocated. There are no site conditions, infrastructure or access requirements or constraints which might prevent development or adversely affect viability and delivery.

3 Answer to Question 3.85 - Would criterion a) be effective in safeguarding the operation of the Rendlesham Water Recycling Centre and provide adequate living conditions for future residents of the site?

- 3.1 Criterion a) of emerging policy SCLP12.62 has been carried forward from its predecessor policy SSP12 unaltered.
- 3.2 A positive consultation response from Anglia Water to a recent planning application is included in Appendix 2.
- 3.3 The Cordon Sanitaire which constrains part of the developable area of Site Allocation SCLP12.62 is understood by relevant parties (landowner, prospective developers, the local planning authority, parish council and consultees) and has been the subject of a supporting Odour Assessment of 24th May 2018 (see Appendix 3) provided with a recent planning application.
- 3.4 The Cordon Sanitaire has been taken into account as an exclusion zone in the housing layout of the recent planning application.
- 3.5 The images below show the Cordon Sanitaire and its relationship to the recently proposed housing layout. In their email of 15 December 2017 Anglian Water proposed a Cordon Sanitaire of a 110 m radius from the centre point of the WRC, based on their own modelling of the predicted dispersion range of malodours.
- 3.6 All proposed residential receptors are outside of the Cordon Sanitaire and as such the consultation response by Anglia Water was supportive. These plans are reproduced at full size in Appendix 4.



- 3.7 The recent planning application referred to above was refused primarily on design grounds on 8th July 2019. However, one reason for refusal relates to this Matter because it concerns odour from the nearby Water Treatment Centre.
- 3.8 The recent planning application refusal will soon be the subject of a Planning Appeal Inquiry and the following information is crucial for the local plan Inspector in understanding the Council's justification for this reason for refusal and how it is being dealt with.
- 3.9 The respective reason for refusal is reproduced in Appendix 5 for ease of reference and makes clear that the reason for refusal was because "The submitted information does not correspond with the latest layout proposal". This is a reference to the fact that the submitted Odour Assessment included an earlier layout design and the Council have therefore claimed they could not know whether the Cordon Sanitaire was affecting the new layout – this could have been answered simply within the bounds of that application had the local planning authority asked but will now have to be answered at appeal.
- 3.10 The inset images above show how the Cordon Sanitaire has remained intact and in place.
- 3.11 The Odour Assessment submitted with the recent planning application is going to be amended in preparation for the Planning Appeal Inquiry shortly. When that amended Odour Assessment is available, we will provide it to the local plan Inspector as it relates to this Matter directly.
- 3.12 However, in the meantime please note that the amended Odour Assessment will be making the following statements, as confirmed by Air Spectrum Environmental, the independent odour assessors who wrote the original report:

- The 2018 Odour Assessment referred to by the local planning authority in their reason for refusal was based on the previously accepted cordon sanitaire.
- The cordon sanitaire has remained static in modelling for this site.
- The amended report will be based on both the new layout but also a more simple and general 'in/out' principle; meaning the assessment conclusions will be transferable to any housing layout which sites houses outside of the cordon sanitaire and as such will not be specific to any particular layout drawing.

3.13 As can be seen in the local plan representations of January 2019 (Enclosure 3 of that document), when the established cordon sanitaire is applied to the site area it leaves a developable area of some 3.2 hectares.

3.14 As has been stated in previous local plan representations, at a reasonable development density of 30 dwellings per hectare, this provides developable land unaffected by the Water Recycling Centre for some 96 dwellings.

3.15 On the basis of this information and evidence we are content that criterion a) of emerging policy SCLP12.62 is effective in safeguarding the operation of the Rendlesham Water Recycling Centre and providing adequate living conditions for future residents of the site for a development of 'approximately 50' dwellings, but also 75 (as in the recent planning application) and up to about 100 on a reasonable development density of 30 dwellings per hectare.

3.16 In respect of the recommended change to criterion a) submitted by Anglia Water (Exam library document A6 page 2340) we are content with this proposed change because the Odour Assessment report (provided for the recent planning application and soon to be amended for the planning appeal inquiry) has provided the evidence necessary to satisfy Anglia Water (see Appendix 2) and to comply with this policy criterion in the future.

3.17 Notwithstanding the above, an alternative question for the Inspector could be:

Is criterion a) even necessary? Is it based on evidence?

3.18 The cordon sanitaire is based on a 2014 assessment (see Appendix 6), upon which Anglia Water based their advice (see Appendix 7). The Anglia Water advice promotes the idea of the cordon sanitaire in order to reflect the industry benchmark odour threshold of 1.5 oue/m³.

3.19 In basic terms residential dwellings are permissible in areas below 1.5 oue/m³ and not in areas above 1.5 oue/m³.

3.20 The 2018 odour report which was submitted in support of the two planning applications on this site (18/2374 and 19/1499) concluded that even within the boundary of the water treatment centre itself odour levels were only 0.14 oue/m³. An order of 10 times less than the benchmark figure. In theory a house could be built within the water treatment centre itself and not experience unacceptable odour levels.

3.21 It is a fact that in 2017 that commercial waste was being drained into the sewer system from Bentwaters and interfering with the normal operation of the WTC. This was addressed and the problem ceased.

3.22 It is the firm opinion of Capital Community Developments that it is entirely probable that similar events happened prior to 2017 and could have caused the anomalous odour levels in 2014 which established the cordon sanitaire upon which criterion a) is based.

3.23 It is noteworthy that it would be counter-intuitive to claim that the odour from the WTC has reduced over time as the 'domestic pressure' on it from increased population. Therefore, it follows that the 2014 levels were probably an anomaly.

- 3.24 On the basis of the two most recent odour assessments, with the WTC operating normally, that there is sufficient evidence for the removal of criterion a) from the emerging policy and evidence to say it should never have been included in its predecessor SSP12.
- 3.25 If criterion a) and the cordon sanitaire are removed then the developable area of SCLP12.62 increases and the housing allocation should follow suit. With an unimpeded developable area of some 5ha and a reasonable housing density of 30 dwellings per hectare ($5 \times 30 = 150$) it is necessary to consider whether even 75 dwellings is not an efficient use of an allocated site.

4 Answer to Question 3.86 - Is the figure of approximately 50 dwellings at the site justified?

- 4.1 No. The figure should be **higher** to be justified, sound and consistent with national policy.
- 4.2 Representations made by Parker Planning on behalf of Capital Community Developments are included in Examination Library Document A6 between pages 2339 and 2371. However, within those pages the linked pdf should be reviewed because it provides the substance of the previous representations in a more readily readable format.
- 4.3 Our arguments remain that the principle of development is well established on this site and recent planning applications have demonstrated an appetite for development and that no significant issues of principle have been raised by statutory consultees that cannot be / or have not already been readily overcome. This is particularly important in relation to the supposed 'limiting factors' as discussed in our previous representations said to include highways (SCC Highways have not objected to a recent proposal for 75 dwellings on site SCLP12.62), education (SCC Infrastructure have not objected to a recent proposal for 75 dwellings on site SCLP12.62), the cordon sanitaire and sewers (Anglia Water has not objected to a recent proposal for 75 dwellings on site SCLP12.62).
- 4.4 Our previous representations (Exam Library Document A6 between pages 2339 and 2371) remain relevant; that there is no evidence-based reason for not increasing the quantum of development back up to at least the 75 figure as it was historically, and there is a compelling planning case for doing so, for the reasons we have previously set out, and to consider increasing it further on the basis of the evidence herein.

Appendix 1

Policy SSP12 - Land west of Garden Square Rendlesham	Policy SCLP12.62: Land West of Garden Square Rendlesham
<p>5.05ha of land west of Garden Square, Rendlesham, as shown on the Policies Map, is identified for a mixed residential development and greenspace provision for approximately 50 units.</p> <p>Development will be expected to accord with the following criteria:</p> <ul style="list-style-type: none"> • Meet the minimum distance from the Water Recycling Centre within which new residential development is considered acceptable as advised by Anglian Water; • Provision of a flood risk assessment; • Accommodate the sewers that cross the site; • The development will need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available; • The design, layout, mix and type of housing proposed is compatible with the housing and transport objectives set out in the 'made' Rendlesham Neighbourhood Plan; • Provision of affordable housing; • The remaining greenspace should be used for a mix of informal open space suitable for daily dog walking, allotments or orchards in accordance with Rendlesham Neighbourhood Plan policy RNPP3; • Provision of a substantial landscape buffer to the northern and western boundaries where it abuts open countryside; • An archaeological assessment will be required; and • A transport assessment. <p>In addition, the air quality impacts of traffic from cumulative development at Melton crossroads and the Air Quality Management Area declared in Woodbridge will need to be investigated in the form of an Air Quality Assessment, together with a mitigation appraisal.</p>	<p>5.05ha of land west of Garden Square, Rendlesham, as shown on the Policies Map, is identified for a mixed development of approximately 50 dwellings and greenspace provision.</p> <p>Development will be expected to accord with the following criteria:</p> <ol style="list-style-type: none"> Meet the minimum distance from the Water Recycling Centre within which new residential development is considered acceptable as advised by Anglian Water; Accommodate the sewers that cross the site; The development will need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available; The design, layout, mix and type of housing proposed is compatible with the housing and transport objectives set out in the 'made' Rendlesham Neighbourhood Plan; Provision of affordable housing; The remaining greenspace should be used for a mix of informal open space suitable for daily dog walking, allotments or orchards in accordance with Rendlesham Neighbourhood Plan policy RNPP3; Provision of a substantial landscape buffer to the northern and western boundaries where it abuts open countryside; A site-specific Flood Risk Assessment is required; Evidence is required to demonstrate there is adequate provision for treatment at the Water Recycling Centre or that this can be provided; and An archaeological assessment will be required. <p>In addition, the air quality impacts of traffic from cumulative development at Melton crossroads and the Air Quality Management Area declared in Woodbridge will need to be investigated in the form of an Air Quality Assessment, together with a mitigation appraisal.</p>

UNC HANGED

UNCHANGED

→ THIS CRITERION HAS NOT BEEN REPEATED.

THIS CRITERION IS NEW WHEN COMPARED TO POLICY SSP12.

Appendix 2

Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please
contact us on 03456 066087, Option 1 or email
planningliaison@anglianwater.co.uk.

AW Site Reference: 731/1/0056953

Local Planning Authority: Suffolk Coastal District

Site: Land To The North And West Of Garden Square And Gardenia Close, Rendlesham

Proposal: A phased development of 75 dwellings, car parking, public open space, hard and soft landscaping and associated infrastructure and access

Planning application: DC/19/1499/FUL

Prepared by: Pre-Development Team

Date: 8 May 2019

ASSETS

Section 1 - Assets Affected

There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.

WASTEWATER SERVICES

Section 2 - Wastewater Treatment

The foul drainage from this development is in the catchment of Rendlesham-Park Water Recycling Centre that will have available capacity for these flows



Section 3 - Used Water Network

The sewerage system at present has available capacity for these flows via a direct connection to the Water Recycling Centre. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection. (1) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (2) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (3) INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. (4) INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. (5) INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

Section 4 - Surface Water Disposal

The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse. Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

FOR THE ATTENTION OF THE APPLICANT - if Section 3 or Section 4 condition has been recommended above, please see below information:

Next steps

Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream. We therefore highly recommend that you engage with Anglian Water at your earliest convenience to develop in consultation with us a feasible drainage strategy.

If you have not done so already, we recommend that you submit a Pre-planning enquiry with our Pre-Development team. This can be completed online at our website <http://www.anglianwater.co.uk/developers/pre-development.aspx>

Once submitted, we will work with you in developing a feasible mitigation solution.

If a foul or surface water condition is applied by the Local Planning Authority to the Decision Notice, we will require a copy of the following information prior to recommending discharging the condition:

Foul water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution including:
 - Development size
 - Proposed discharge rate (Should you require a pumped connection, please note that our minimum pumped discharge rate is 3.8l/s)
 - Connecting manhole discharge location (No connections can be made into a public rising main)
- Notification of intention to connect to the public sewer under S106 of the Water Industry Act (More information can be found on our website)
- Feasible mitigation strategy in agreement with Anglian Water (if required)

Surface water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution, including:
 - Development hectare size
 - Proposed discharge rate (Our minimum discharge rate is 5l/s. The applicant can verify the site's existing 1 in 1 year greenfield run off rate on the following HR Wallingford website -<http://www.uksuds.com/drainage-calculation-tools/greenfield-runoff-rate-estimation> . For Brownfield sites being demolished, the site should be treated as Greenfield. Where this is not practical Anglian Water would assess the roof area of the former development site and subject to capacity, permit the 1 in 1 year calculated rate)
 - Connecting manhole discharge location
- Sufficient evidence to prove that all surface water disposal routes have been explored as detailed in the surface water hierarchy, stipulated in Building Regulations Part H (Our Surface Water Policy can be found on our website)

Appendix 3

 air quality & monitoring site odour assessment odour dispersion modelling dust monitoring bioaerosol monitoring scentroid equipment

Air Spectrum Environmental Limited

Spectrum Environmental Support

Spectrum House
Checketts Lane
Checketts Lane Industrial Estate
Worcester
WR3 7JW

Lois Bladen
Dr Magdalena Sadyś
Aidan Wrynne

Odour Assessment

Capital Community Developments

Anthony Hardy

30 Gardenia Close
Rendlesham
Woodbridge
IP12 2GX

JL18766
Version 4.0

24/05/2018

 odour lab odour threshold analysis odour management

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ABBREVIATIONS

ASE	Air Spectrum Environmental Limited
BS EN	British Standard European Norm
DEFRA	Department for Environment, Food & Rural Affairs
EA	Environment Agency
IPPC	Integrated Pollution Prevention and Control
NPPF	National Planning Policy Framework
SES	Spectrum Environmental Support
STW	Sewage Treatment Works
UKWIR	UK Water Industry Research
WWTW	Waste Water Treatment Works

EXECUTIVE SUMMARY

Air Spectrum Environmental Ltd (ASE), incorporating Spectrum Environmental Support (SES) were commissioned to undertake an odour dispersion model of a proposed site development by Capital Community Developments situated near Jays Croft Road, Rendlesham, Woodbridge IP12 2TQ. Data entered within the dispersion model was based upon a previous report done for Persimmon Homes Anglia where the emission data for the Sewage Treatment Works (STW) was supplied by Anglian Water.

The results of this assessment indicate that ground level odour concentrations at the proposed residential development are well below the $1.5 \text{ ou}_E/\text{m}^3$ 98th percentile (hourly average) limit. Therefore, based on the findings within this assessment, it appears that the proposed residential development would not be subjected to odour nuisance from the STW site.

1.0 INTRODUCTION

1.1 Background

Air Spectrum Environmental Ltd (ASE), incorporating Spectrum Environmental Support (SES) were commissioned to undertake an odour dispersion model of a proposed site development by Capital Community Developments situated near Jays Croft Road, Rendlesham, Woodbridge IP12 2TQ. Data entered within the dispersion model was based upon a previous report done for Persimmon Homes Anglia where the emission data for the Sewage Treatment Works (STW) was supplied by Anglian Water.

Capital Community Developments propose to develop the site into a residential area and have procured SES to report on the impacts of the odour release from the STW. The STW is situated to the North of the development in Rendlesham. During the planning stages, concerns have been raised about the off-site odours which may cause nuisance to new residents.

To assess the risk that off-site odours may cause a nuisance to the future residents of the development, SES has completed an odour impact assessment for the odour sources identified. ADMS 5 software was used to prepare the dispersion model to quantify the odour risk to the planned development.



Figure 1 - Planned Development

1.2 Limitations

Air Spectrum Environmental Limited has prepared this report for the sole use of the client, showing reasonable skill and care, for the intended purposes as stated in the agreement under which this work was completed.

The report may not be relied upon by any other party without the express agreement of the client. No other warranty, expressed or implied is made as to the professional advice included in this report.

Where any data supplied by the client or from other sources have been used it has been assumed that the information is correct. No responsibility can be accepted by ASE for inaccuracies in the data supplied by any other party. The conclusions and recommendations in this report are based on the assumption that all relevant information has been supplied by those bodies from whom it was requested.

No part of this report may be copied or duplicated without the express permission of ASE and the client.

Where field investigations have been carried out these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the Safety, Health, Environment and Quality Management System of ASE.

2.0 REGULATORY GUIDANCE

2.1 Odour guidance and legislation

There are currently no statutory standards or regulations in the UK for the release and subsequent impacts of odours. This is due to the complexities involved with measuring and assessing odours against compliance criteria, and the inherent subjective nature of odours.

It is recognised that odours have the potential to pose a nuisance for residents living near a source of offensive odour. In these cases, determination of whether or not an odour constitutes a statutory nuisance is usually the responsibility of the local planning authority or the Environment Agency. The Environmental Protection Act 1990 (Stationery Office, 1990) outlines that a local authority can require measures to be taken where:

“Any dust, steam, smell or other effluvia arising on an industrial, trade and business premises and being prejudicial to health or a nuisance...” or

“fumes or gases are emitted from premises so as to be prejudicial to health or cause a nuisance...”

Within the Environment Agency H4 Guidance on Odour Management there are benchmark levels of odour on the site boundary dependent on its offensiveness, ranging between C98, $1.5 \text{ ou}_E/\text{m}^3$ and C98, $1 \text{ hour } 6 \text{ ou}_E/\text{m}^3$. This is due to variations in an odours apparent offensiveness and a receptors sensitivity.

The benchmarks are:

- 1.5 odour units for most offensive odours
- 3 odour units for moderately offensive odours
- 6 odour units for less offensive odours.

2.2 National Planning Policy

The National Planning Policy Framework (NPPF) was published in March 2012. This sets out the Government’s planning policies for England and how they are expected to be applied. In relation to conserving and enhancing the natural environment, paragraph 109 states that:

“The planning system should contribute to and enhance the natural and local environment by..... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.”

Pollution is defined by the NPPF as:

“Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.”

2.3 Odour measurement

Odour exposure and impact can be measured via two methods; by specific compound measurement or; by total odour by dynamic dilution olfactometry.

Specific gas measurement is often used when an emission from a site is dominated by an individual odorous compound, such as hydrogen sulphide at a Waste Water Treatment Works (WWTW). Monitoring of the odorous compound, both at its source and receptor location, can provide a simple evaluation of the odour emission.

Total odour by dynamic dilution olfactometry determines the odour threshold for a complex mixture of chemicals. Odour threshold is a measurement of concentration for an odorous gas. The measurement is achieved by presenting a dilution range of the test gas to a panel of acuity assessed panellists. Panellists indicate when they can detect an odour or not, at each dilution range presented. The detection point is the dilution at which 50 % of the panel can detect an odour, which in turn represents an odour concentration of 1 ou_E/m³. The test sample odour concentration is calculated by multiplying detection concentration (1 ou_E/m³) by the dilution required to achieve detection point. Odour threshold is measured in accordance with BS EN 13725:2003¹ "Determination of odour concentration by dynamic Olfactometry". Once threshold analysis is completed it gives the point of detection of the odour and its apparent strength in ou_E/m³.

For the purposes of this model the odour emission values were given by Anglian Water.

2.4 UK case law

The most commonly applied criterion in relation to odour assessment is the 'Newbiggin criterion'. This criterion was originally introduced into a public inquiry for a new sewage works at Newbiggin-by-the-sea in 1995, defended by Northumbrian Water Limited. It equates to an odour exposure level of 5 European odour units per cubic meter (C98, 1 hour > 5 ou_E/m³). The Newbiggin criterion has been successfully applied during numerous planning and nuisance assessment studies since 1995, for sewage, waste, food and a range of other industrial and agricultural activities.

These indicative criteria aim to differentiate between odours of different offensiveness, and range from C98, 1 hour > 1.5 ou_E/m³ (for highly offensive odours) to C98, 1 hour > 6 ou_E/m³ (for low offensive odours). It should be noted that the sewage treatment sector does not currently fall under the IPPC regime and that these criteria are based on relatively limited data and have not undergone any robust validation in terms of their applicability to the sewage treatment sector in the UK.

The comparison of odour exposure levels generated by the works before and after completion of the proposed sludge dewatering schemes was focused on the Newbiggin criterion (C98, 1 hour = 5 ou_E/m³), and the most stringent EA criterion (C98, 1 hour = 1.5 ou_E/m³).

¹ BS EN 13725:2003 Air Quality – Determination of Odour Concentration by Dynamic Olfactometry

Table 1 Newbiggin criterion

Relative Offensiveness	Indicative Criteria
High	1.5 ou _E /m ³ 98 th percentile (hourly average)
Medium	3 ou _E /m ³ 98 th percentile (hourly average)
Low	6 ou _E /m ³ 98 th percentile (hourly average)

2.5 UK Water Industry Research

A published study by the UK Water Industry Research (UKWIR)² detailed the correlation between the modelled odour impact areas with receptor responses. Published in 2001 the document shows from a study of 9 wastewater treatment works, how the complaints vary:

- At C98, _{1 hour} 5ou_E/m³ – complaints rare; 3% registered
- Between C98, _{1 hour} 5ou_E/m³ and C98, _{1 hour} 10ou_E/m³ – increase in complaints; 38% registered
- Above C98, _{1 hour} 10ou_E/m³ – significant increase in complaints; 59% registered.

2.6 DEFRA compost guidance

The compost guidance in 2009 relating to good practise and odour control for composting sites (excluding those processing slaughterhouse waste) gives C98, _{1 hour} 3ou_E/m³ as an odour impact criteria taken from dispersion modelling.

² Odour Control in Wastewater Treatment – A Technical Reference Document. Ref 01/WW/13/3 – UKWIR, 2001
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3.0 IMPACT ASSESSMENT METHOD

3.1 Odour emission sources

A desktop study revealed two potential odour sources which are in close proximity to the proposed site at Rendlesham. Firstly, the Anglian Water STW to the North of the development site and secondly, the Stokes Sauces factory to the North-East. Within this study only the STW has been considered in the dispersion model. The sauce factory has been omitted because the operation is small and is deemed to have negligible effect.

The odour emission data was provided by Anglian Water and is displayed in Table 3.

Table 2 Odour Emission Data

Name	Shape	No	L (m)	W (m)	Dia (m)	Elev (m AOD)	Area (m ²)	Emission rate (ouE/m ² /s)	Comments
Inlet works reception chamber	circular	1	N/A	N/A	1.5	27	1.8	50	UKWIR: typical rate to reflect pumped flow
Screenings skip	rectangular	1	3	2	N/A	27	6.0	20	AW internally derived from model library
Screen chamber	rectangular	1	10	2.5	N/A	30	25.0	20	UKWIR: low rate to reflect low risk of septicity
Balance tank	circular	1	N/A	N/A	15	30	176.6	0.8	Use UKWIR low rate for PST to reflect diffused air and no settlement
Bio-bubble reactor 1	circular	1	N/A	N/A	13	32	132.7	4	Use UKWIR typical rate for activated sludge plant
Bio-bubble reactor 2	circular	1	N/A	N/A	13	32	132.7	4	Use UKWIR typical rate for activated sludge plant
Bio-bubble desludging chambers	rectangular	2	1	1	N/A	27	2.0	140	Use UKWIR low rate for agitated raw sludge to reflect aerobic process
Sludge storage tank	circular	1	N/A	N/A	3	29	7.1	40	Use UKWIR low rate for quiescent raw sludge to reflect aerobic process
New sludge storage tank	circular	1	N/A	N/A	7.5	29	44.2	40	Use UKWIR low rate for quiescent raw sludge to reflect aerobic process
Wash water storage tank	circular	1	N/A	N/A	7.5	0.3	44.2	0.3	Use UKWIR low rate for final tank
Attenuation tank	Circular	1	N/A	N/A	7.5	0.3	44.2	0.3	Use UKWIR low rate for final tank



Within this assessment 4 receptor locations have been used to predict ground level odour concentration across the planned site. The receptor locations have been chosen to represent the far South and West boundaries, as well as a central and eastern location.



Figure 3 Receptor locations

Table 3 Receptor locations

Receptor		Location	
		x	y
R1	East	633843	253859
R2	South	633738	253717
R3	West	633603	253811
R4	Centre	633751	253810

3.3 Meteorological data

The relevant meteorological data used was from Wattisham, following discussions with the data provider. The proposed site is approximately 30 km from the weather station and contained all relevant weather parameters used within the model for the 3 years' worth of data required. The years covered in this assessment are 2014-2016.

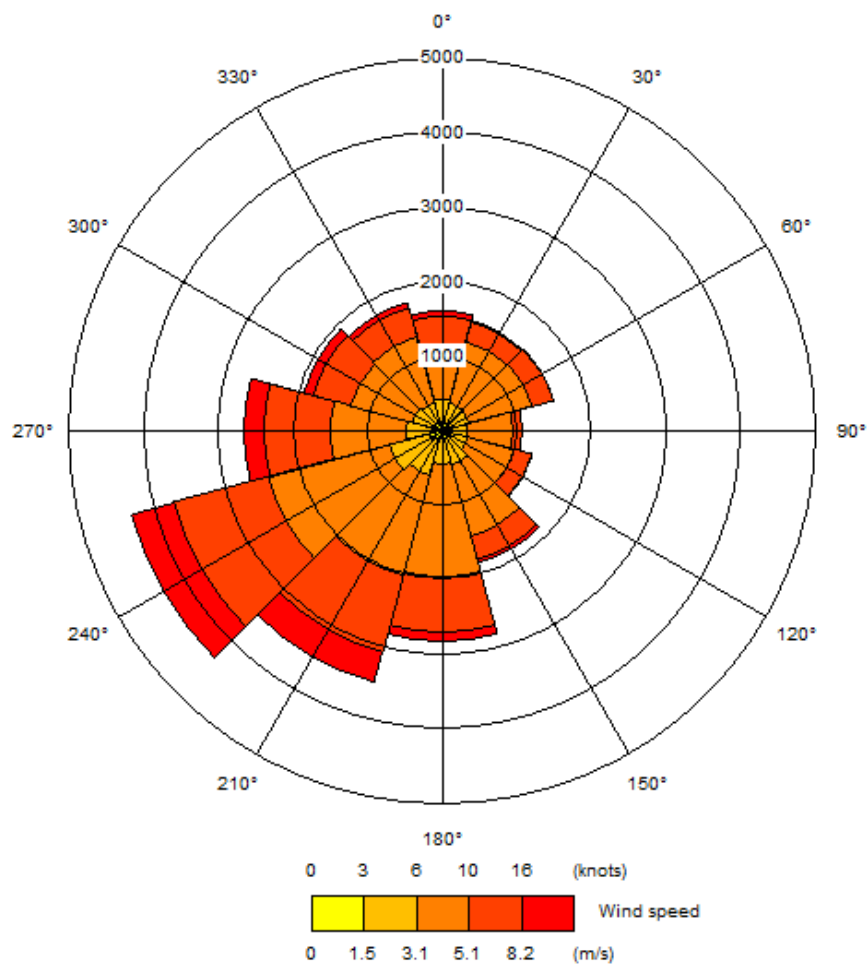


Figure 4 Windrose data for Wattisham 2014-2016

3.4 Dispersion model inputs

The dispersion model was run using the input parameters which are detailed in Table 4.

Table 4 Model input parameters

	Parameter	Source Type	Central Location		Emission Velocity m/s	Flow Rate m ³ /s	Total Emission Rate OU _E /s
			x	y			
Source	Inlet works Reception Chamber	Point	633806	253927	0.1	0.177	150
	Screenings Skip	Line	633823 633827	253922 253922	0.1	0.079	20
	Screen Chamber	Line	633806 633804	253925 253916	0.1	0.079	60
	Balance Tank	Area	633796 633803 633793 633788	253930 253920 253918 253925	0.1	17.671	2.4
	Bio-bubble reactor 1	Point	633783	253899	0	0	12
	Bio-bubble reactor 2	Point	633801	253897	0	0	12
	Bio-bubble desludging chambers	Point	633779 633791	253911 253907	0.1	0.079	420 420
	Sludge Storage Tank	Point	633813	253919	0.1	0.707	120
	New Sludge Storage Tank	Point	633822	253904	0.1	4.418	120
	Wash water Storage Tank	Point	633819	253892	0.1	4.418	1.2
	Attenuation Tank	Point	633829	253895	0.1	4.418	1.2

All input locations are based on estimates made using satellite images and cannot be verified as being accurate. All sources have been modelled to emit 24 hours a day to ensure worst case scenario is predicted.

3.5 Dispersion model scenarios

To characterise the impact of the odour emissions from the STW, a single scenario was modelled:

- Scenario 1 – All sources considered. No near field buildings included (including proposed buildings) and odour emission rates as defined in Table 4.

3.6 Modelling software

The site information was input into ADMS to determine the relationship between the STW and the proposed development land. Emission data and meteorological data was then fed into the model to enable prediction of the level of exposure to odours at locations surrounding the site under the normal operational regime for the facility. The results of the modelling are presented in the form of contours (or isopleths - lines connecting points with equal frequency of occurrence) for a 1-hour average limit concentration of x_{ouE}/m^3 as a 98% (percentile) ($C98, 1 \text{ hour} = X_{ouE}/m^3$) which defines the area where odour nuisance may occur.

ADMS³ is a state-of-the-science dispersion modelling system that simulates essential atmospheric physical processes and provides refined concentration estimates over a wide range of meteorological conditions and modelling scenarios. It is based on atmospheric boundary layer turbulence structure and scaling concepts, including treatment of multiple ground-level and elevated point, area and volume sources. It handles flat or complex, rural or urban terrain and includes algorithms for building effects and plume penetration of inversions aloft. It uses Gaussian dispersion for stable atmospheric conditions (*i.e.*, low turbulence) and non-Gaussian dispersion for unstable conditions (high turbulence).

ADMS includes two data pre-processors for streamlining data input. A meteorological pre-processor, computes boundary layer and other necessary parameters for use with ADMS and uses standard hourly sequential data supplied from the UK Met Office. There is also a terrain pre-processor option that simplifies the computation of receptor elevations and effective height scales for numerous types of digital data formats, including OS Landform Panorama digital terrain maps. The model is considered appropriate by the UK Environment Agency for assessments of the nature described in this report

³ Software used: ADMS 5.1 model version: 5.1.2.0.

3.7 Odour impact assessment criteria

The objective of this assessment was to establish whether the odour emissions resulting from the STW at Rendlesham would result in predicted odour nuisance at the proposed residential development.

Taking into consideration the guidance discussed we assume that sensitive receptors would be able to detect odour resulting from the STW at between 1.5 - 3 ou_E/m³, and odours above 3 ou_E/m³ 98th percentile would cause nuisance.

3.8 Odour modelling uncertainties

Uncertainty in dispersion modelling predictions can be associated with a variety of factors, such as:

- **measurement error** – error in input data, including emission estimates, operational procedures, land use characteristics and meteorology which can be detected and corrected;
- **systematic error** – unnoticed error which may occur during the sampling (data collection);
- **model uncertainty** – model limitations and assumptions based on which it was computed;
- **inherent randomness** – knowledge of starting conditions does not result in certainty related to the final modelling outcome;
- **natural variation** – change in time and place in natural systems;
- **subjective judgement** – data interpretation, especially when data is scarce.

Potential uncertainties in the model results were minimised as far as practicable and worst-case inputs used to provide an accurate assessment. This included the following:

- choice of model - ADMS-5 is a commonly used atmospheric dispersion model and results have been verified through a number of studies to ensure predictions are as accurate as possible; in the UK odour assessments are almost exclusively undertaken using the ADMS or AERMOD models;
- meteorological data - modelling was undertaken using meteorological data set from an observation site within 30 km of the facility to take account of local conditions; a few years of data minimise the risk of inclusion of abnormal weather conditions;
- plant operating conditions - SES have attempted to model information in the worst-case scenario, where all considered odour sources emit constantly;
- emission rates - emission rates were derived from monitoring undertaken at similar facilities. As such, they are considered to be representative of potential releases during normal operation;
- sensitive receptor locations - a Cartesian grid was included in the model to provide suitable data for contour plotting. Receptor points were also included at sensitive locations to provide additional consideration of these areas; and,

-
- variability - all model inputs are as accurate as possible and worst-case conditions were considered as necessary to ensure a robust assessment of potential pollutant concentrations.

Results were considered in the context of the relevant odour benchmark level and IAQM criteria. It is considered that the use of the stated measures to reduce uncertainty and the use of worst-case assumptions when necessary has resulted in model accuracy of an acceptable level.

4.0 CONTOUR MAPS

Within this section the contour maps are detailed separately. The colour graded key represents ground level odour concentrations ($C98, 1\text{-hour} \times \text{ou}_E/\text{m}^3$) at the specific point with odour concentrations increasing as the colour turns yellow to red.

4.1 Scenario 1

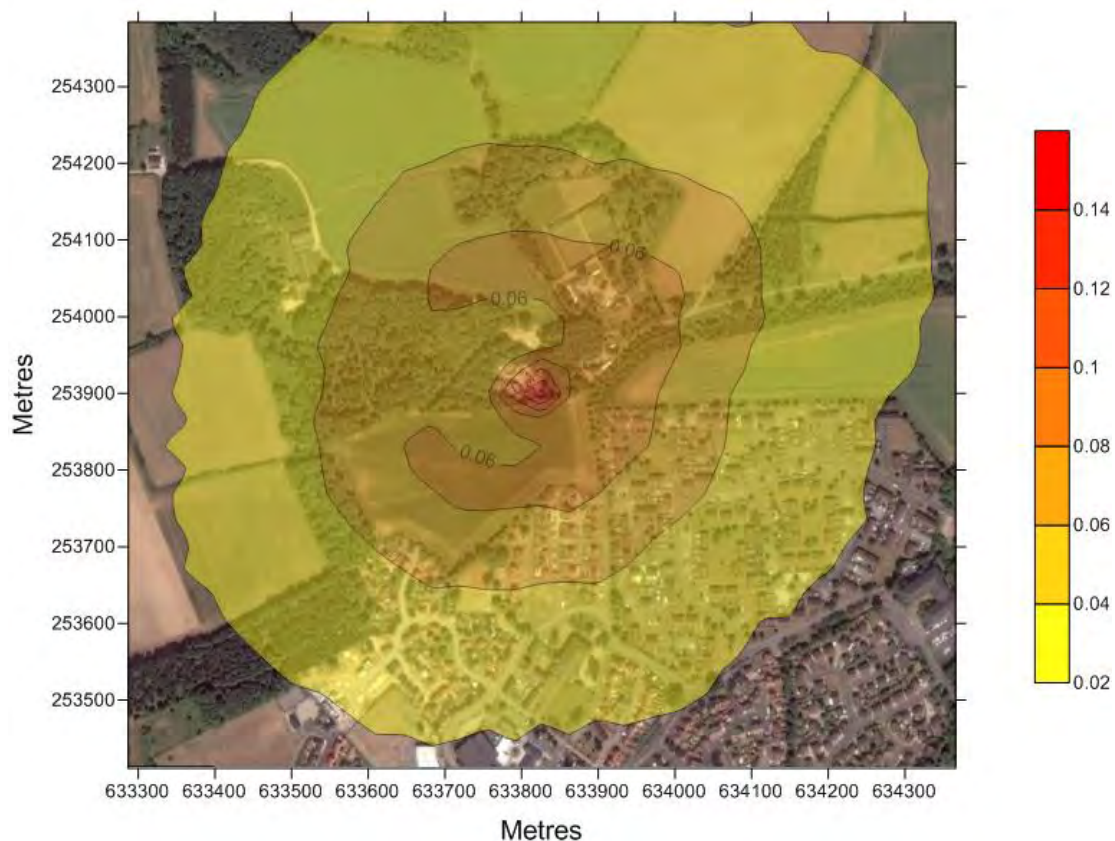


Figure 5 Ground Level Odour Concentrations - Scenario 1

5.0 ASSESSMENT OF IMPACTS

Based on the findings within this assessment, it appears that the proposed residential development would not be subjected to odour nuisance from the STW site.

Table 5 details the ground level odour concentrations for the scenario that has been run in ADMS. Where odour levels fall above $C98, 1 \text{ hour} = 3 \text{ ou}_E/\text{m}^3$ the table cell is highlighted in pink, indicating the likely chance of odour nuisance at that receptor.

Table 5 Receptor ground level odour concentrations

Receptor Name	Ground Level Concentration ($C98, 1 \text{ hour} \times \text{ou}_E/\text{m}^3$) Scenario 1
R1	0.0083
R2	0.0040
R3	0.0037
R4	0.0053

SES, based on the findings within this assessment, would suggest that any development of Rendlesham is likely to not lead to odour complaints from the residents. However, the odour emission measurements which were supplied by Anglian Water may be greater or less than what has been modelled.

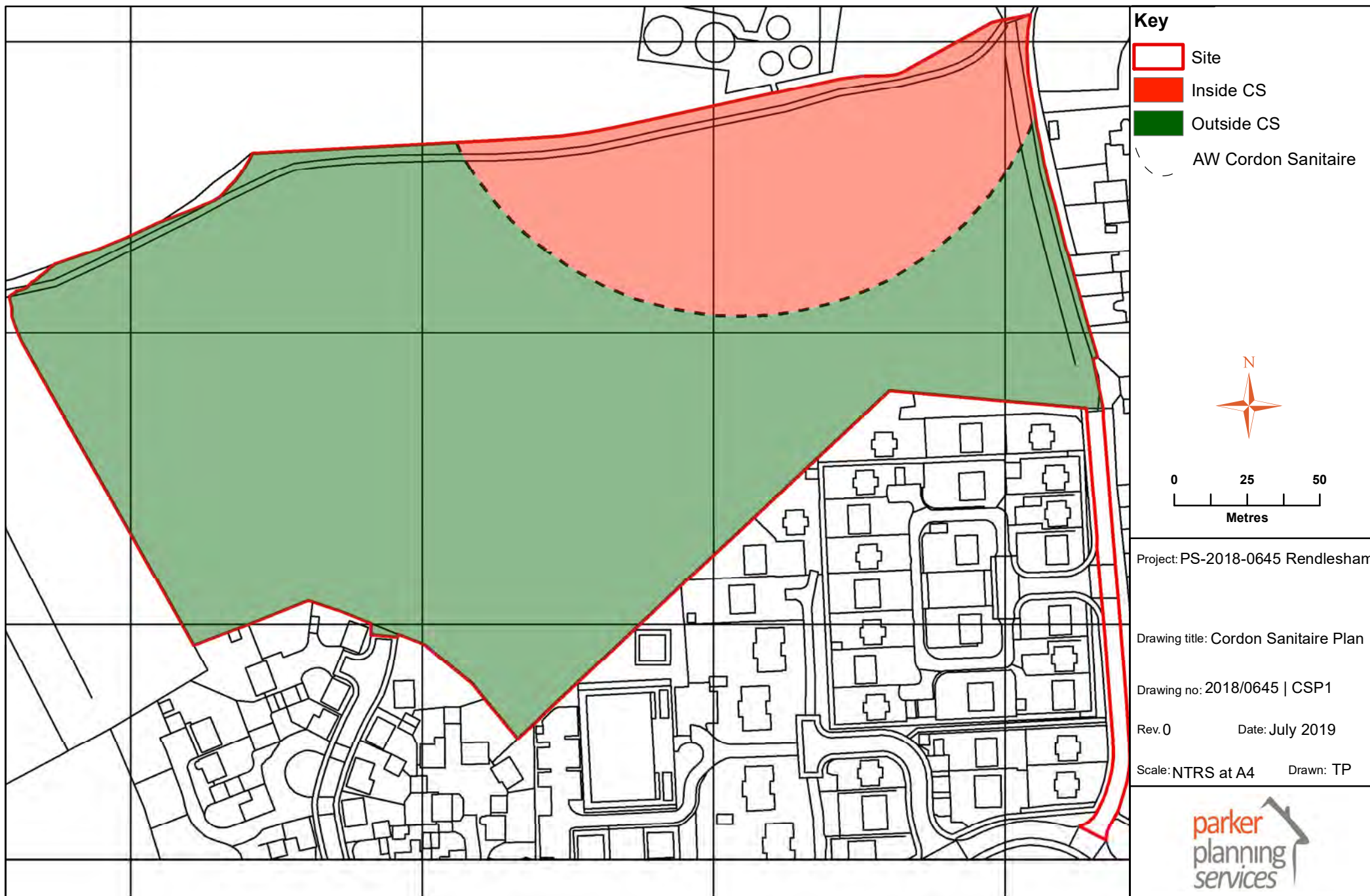
APPENDIX

BS EN 13725:2003 Air Quality – Determination of Odour Concentration by Dynamic Olfactometry

Odour Control in Wastewater Treatment – A Technical Reference Document. Ref 01/WW/13/3 – UKWIR, 2001

Software used: ADMS 5.1 model version: 5.1.2.0.

Appendix 4





Key

Site

AW Cordon Sanitaire

N

0 25 50
Metres

Project: PS-2018-0645 Rendlesham

Drawing title: Cordon Sanitaire Plan

Drawing no: 2018/0645 | CSP1

Rev.0 Date: July 2019

Scale: NTRS at A4 Drawn: TP

Designed by:
CAPITAL COMMUNITY DEVELOPMENTS LTD
100 High Street, Rendlesham, Suffolk, Suffolk
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Drawing based on CCD dwg: 84 SP / P rev E, re-represented by:

Author: TP
Date: 05-04-2019

Scale: 1:500

Project: PS-2018-0645 Rendlesham

Drawing title: Cordon Sanitaire Plan

Drawing no: 2018/0645 | CSP1

Rev.0 Date: July 2019

Scale: NTRS at A4 Drawn: TP

parker
planning
services

Appendix 5

4. To the north east of the site is an Anglian Water Treatment Works, therefore there is a Cordon Sanitaire covering part of the north east of the site. The application provides insufficient assessment information regarding the potential impacts of odour from the sewage plant and the effect that may have on the proposed layout and open spaces. The submitted information does not correspond with the latest layout proposal. It is therefore not possible to determine that there will be no effects on residents which would adversely affect their amenity and the effectiveness of the current extent of cordon sanitaire around the sewage treatment plant. On that basis, in the absence of adequate assessment of effects the proposal may result in adverse impacts on residential amenity contrary to policies DM21and DM23 of the East Suffolk Council - Suffolk Coastal District - Core Strategy and Policy SSP12 of the East Suffolk Council - Suffolk Coastal District - Site Allocations and Area Specific Policies, and the NPPF.

Appendix 6



Air Spectrum Environmental Ltd

Odour Dispersion Modelling Assessment

Produced for:

Persimmon Homes Anglia

Air Spectrum Environmental Limited

General Notes:

Prepared by : Peter Badham

Prepared for : Persimmon Homes Anglia

Site address : Rendlesham STW IP12 2TN

Report Date : 26th February 2014

Issue Date : 27th February 2014

Job number : JA14824

Issue No: 1.0

██████ed by: P Badham



Air Spectrum Environmental Limited (ASE) has prepared this report for the sole use of the client, showing reasonable skill and care, for the intended purposes as stated in the agreement under which this work was completed.

The report may not be relied upon by any other party without the express agreement of the client and ASE. No other warranty, expressed or implied is made as to the professional advice included in this report.

Where any data supplied by the client or from other sources have been used it has been assumed that the information is correct. No responsibility can be accepted by ASE for inaccuracies in the data supplied by any other party. The conclusions and recommendations in this report are based on the assumption that all relevant information has been supplied by those bodies from whom it was requested.

No part of this report may be copied or duplicated without the express permission of ASE and the party for whom it was prepared.

Where field investigations have been carried out these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the Safety, Health, Environment and Quality Management System of ASE.

EXECUTIVE SUMMARY

Air Spectrum Environmental Limited was commissioned by Persimmon Homes Anglia to produce an odour dispersion model based upon assumed odour emissions from a Sewage Treatment Works (STW) located to the North of Rendlesham, Suffolk; and report on the impact which any odour release will have on the proposed development site located to the South of the STW.

The air quality impacts in terms of odour concentrations; resulting from the operation of the STW under normal operating conditions have been assessed using an advanced dispersion model software package (ADMS 5). All predicted ground level concentrations of odour were modelled in the near field environment.

The air quality impacts in terms of odour concentrations; resulting from the operation of the STW under normal operating conditions have been assessed using an advanced dispersion model software package (ADMS 5). All predicted ground level concentrations of odour were modelled in the near field environment.

All locations within a 2km by 2km area were covered by the model assessment, and it was found that the level of odour concentrations were highest within the boundary of the STW, with little odour visible in the proposed development area, any visible footprint contained within the report are below the threshold of detection $1 \text{ OU}_E/\text{m}^3$.

Model Scenario	Highest odour level (OU_E/m^3)	Lowest odour level (OU_E/m^3)
Standard model (3 year met data) 98 th Percentile	4.5	0.5

The odour impact upon the proposed development and local amenity is considered to be below the recognised threshold of detection.

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INTRODUCTION

Scope

Air Spectrum Environmental Limited was commissioned by Persimmon Homes Anglia to produce an odour dispersion model based upon assumed odour emissions from a Sewage Treatment Works (STW) located to the North of Rendlesham, Suffolk; and report on the impact which any odour release will have on the proposed development site located to the South of the STW.

The modelling assessment takes into account, and includes a discussion of, the following key parameters/elements:

- Site Parameters
- Assessment criteria
- Emission parameters
- Modelling domain
- Meteorology

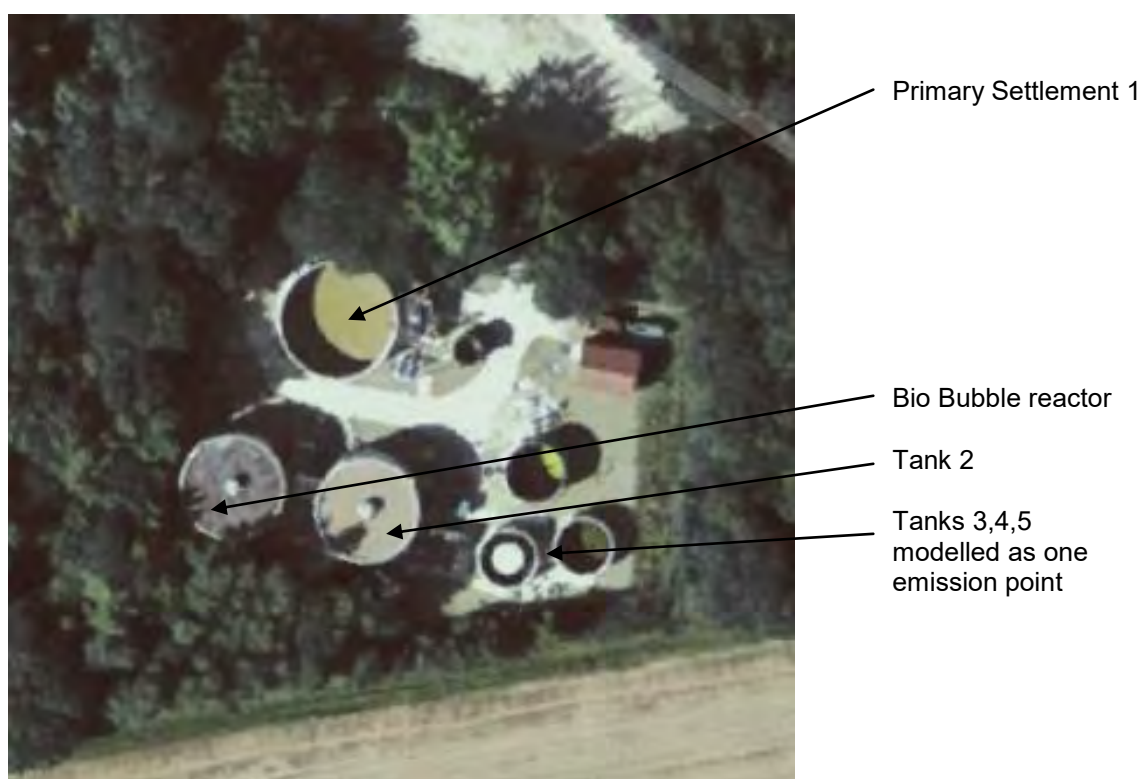
Site Description

The Sewage Treatment Works (STW) is located to the North of Rendlesham (E: 633798, N: 253923). The STW is of reasonable size consisting of primary and secondary filters, inlet works and settlement tanks. For the purposes of this dispersion model, historic data collected from other UK STW was used.

The STW has not been visited by Air Spectrum Environmental under the scope of this report and so mapping software has been used to produce location, dimensional and visual information. No detailed information was supplied by persimmon and little information was available via Anglian water.

The site has been described as shown below:

Figure 1.1 Site location overhead views



Site Operation

The emission points for this dispersion model were selected based upon experience, previous STW site surveys and odour measurement operations and were assumed to operate in a similar manner to other STW's of this size.

Emission points data as follows:

Location	Dimensions	Easting (centre)	Northing (centre)
Primary Settlement	15m Diameter	633798	253923
Bio-Bubble Reactor	12m Diameter	633785	253901
Tank 2	12m Diameter	633801	253899
Tanks 3,4 & 5	7m Diameter	633826	253899

Assessment Methodology

Assessment criteria

The odour sources associated with each operational condition were defined on the basis of historical data collected from previous site assessments on similar STW's located around the UK carried out by Air Spectrum Environmental. Emission estimates (expressed in terms of European odour units OU_E) for each source were then estimated using this historical data. All of the historical data utilised was collected using sampling and analysis techniques compliant with the British Standard for Olfactometry BSEN13725.

The historical data describing odour emissions from STW's was used as input for a mathematical atmospheric dispersion model (ADMS 5) along with sequential hourly average data from a representative meteorological station (Middle Wallop 2010), and topographical data which describe the nature and surface characteristics of the surrounding area.

Model Description

ADMS is a state-of-the-science dispersion modelling system that simulates essential atmospheric physical processes and provides refined concentration estimates over a wide range of meteorological conditions and modeling scenarios. It is based on atmospheric boundary layer turbulence structure and scaling concepts, including treatment of multiple ground-level and elevated point, area and volume sources. It handles flat or complex, rural or urban terrain and includes algorithms for building effects and plume penetration of inversions aloft. It uses Gaussian dispersion for stable atmospheric conditions (i.e., low turbulence) and non-Gaussian dispersion for unstable conditions (high turbulence).

ADMS includes two data pre-processors for streamlining data input. A meteorological pre-processor, computes boundary layer and other necessary parameters for use with ADMS and uses standard hourly sequential data supplied from the UK met office. There is also a terrain preprocessor option that simplifies the computation of receptor elevations and effective height scales for numerous types of digital data formats, including OS Landform PROFILE 10m digital terrain maps. The model is considered appropriate by the UK Environment Agency for assessments of the nature described in this report.

The dispersion model for the facility was established using plans of the site, the site plans were input into ADMS to determine the relationship between the facility and the proposed development land. Emission data and meteorological data were then fed into the model to enable the level of exposure to odours at locations surrounding the site to be predicted, under the normal operational regime for the facility. The results of the modeling were presented in the form of contours (or isopleths - lines connecting points with equal frequency of occurrence) for a 1-hour average limit concentration of $x \text{ ou}_E/\text{m}^3$ as a 98%ile (percentile) ($C_{98, 1\text{-hour}} = X \text{ ou}_E/\text{m}^3$) which defines the area where odour nuisance may occur.

¹ IPPC Technical guidance note, H4. EA.

Emission Sources

The following emission sources were included in the dispersion modelling assessment:

Location	Dimensions	Easting (centre)	Northing (centre)
Primary Settlement	15m Diameter	633798	253923
Bio-Bubble Reactor	12m Diameter	633785	253901
Tank 2	12m Diameter	633801	253899
Tanks 3,4 & 5	7m Diameter	633826	253899

Emission Parameters

The emission parameters for each source included in the dispersion modelling study are summarised in table 2.3.

Table 2.3 Emission parameters

Location	Dimensions	Easting (centre)	Northing (centre)	Emission OU_E/s
Primary Settlement	15m Diameter	633798	253923	252
Bio-Bubble Reactor	12m Diameter	633785	253901	465
Tank 2	12m Diameter	633801	253899	252
Tanks 3,4 & 5	7m Diameter	633826	253899	145

Modelled Scenarios

In order to characterise the impact of the odour emissions from the collective odour emissions from the STW, a single scenario was modelled as follows:

- **Scenario 1:** Full dispersion model with no near field buildings included (including proposed development buildings) and odour emissions rates as defined in table 2.3 . Annual hourly sequential meteorological data from Wattisham weather station covering 2011 to 2013.

Note: Buildings data based upon Environment Agency Guidance document AQTAQ 06 "Technical guidance on detailed modelling approach for an appropriate assessment of emissions to air"

Modelled Domain

A near field domain was incorporated in the dispersion model to predict the odour concentrations within the client's proposed site. The near field domain covers an area of 2km by 2km and had a grid resolution of 50m. Normally the modelled domain would be in the region of 1km square, but this was extended to ensure that the whole proposed development land was covered.

Fig 2.7a

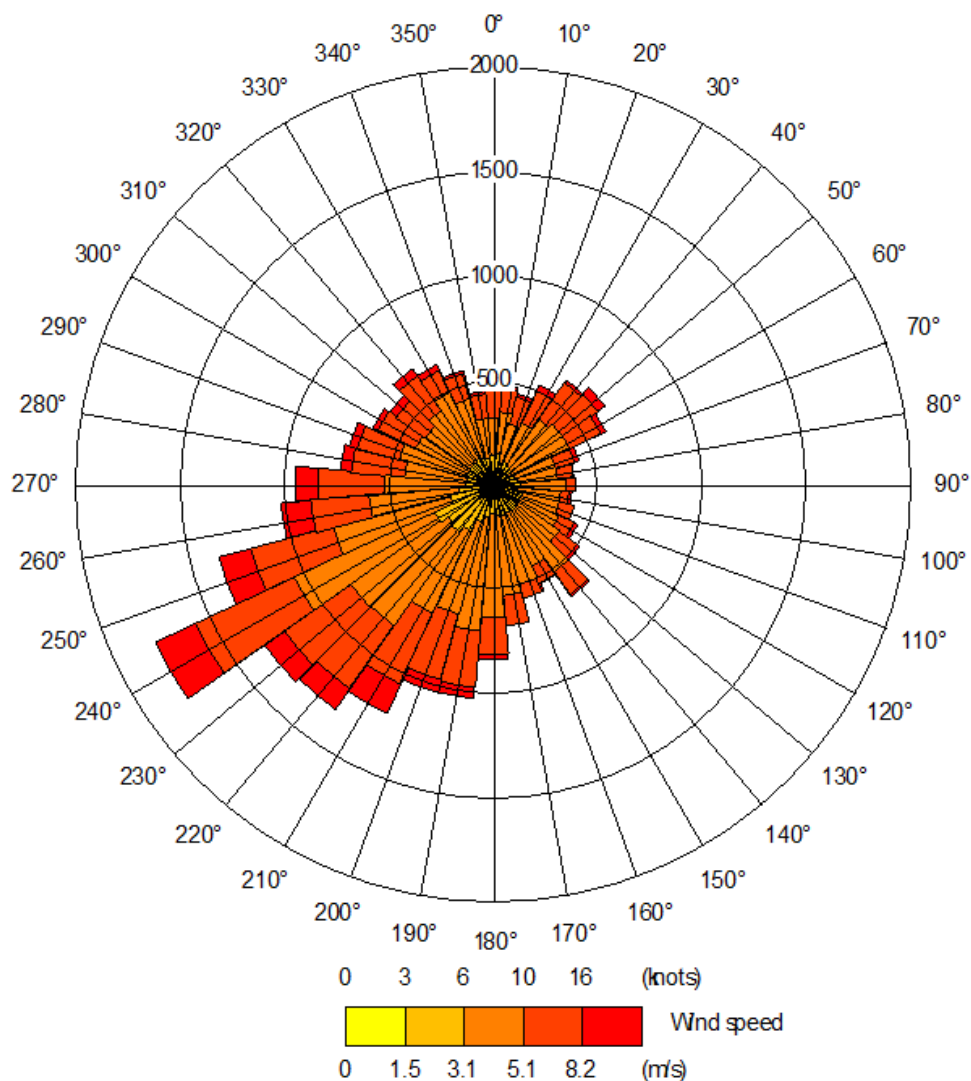


The Red boundary lines are the proposed development, the Blue boundary defines the STW

Meteorological Data

The supplied data was extracted from the nearest Met office station located at Wattisham. The meteorological data was supplied for 3 years 2011 to 2013. The data is hourly sequential and wind rose produced from the data is shown below in figure 2.1.

Figure 2.1: Wind-rose derived from meteorological data



From the above windrose, it is evident that the prevailing wind is from a south Westerly Quadrant

Terrain

Standard Landform Panorama terrain data sets were used within ADMS to determine the localised effect on the odour emission.

Assessment of Odours

Using previous samples collected from a similar STW or comparable operation and size, the data is shown in table 3.1

Odour concentration is measured in European Odour Units, $\text{OU}_\text{E}/\text{m}^3$.

By definition 1 $\text{OU}_\text{E}/\text{m}^3$ is the threshold of odour for that specific sample.

As guidance only, 3 – 5 $\text{OU}_\text{E}/\text{m}^3$ will be detectable and 5 – 10 $\text{OU}_\text{E}/\text{m}^3$ will become annoying.

1000 odour units represent an odour 1000 times greater than the concentration at which the odour in the sample would be first detected.

Note, the odour concentration is not a linear measure for the intensity of an odour. Thus, for one specific gas there will not be a direct relationship between $\text{OU}_\text{E}/\text{m}^3$ and mg/m^3 (or PPM) over a range of readings.

The laboratory analysis result does not give a definite result. The given answer is subject to an error tolerance. For a result of 1000 $\text{OU}_\text{E}/\text{m}^3$ and a 95% confidence level, the actual possible range is:

For duplicate samples the possible range is 571 to 1752.

For triplicate samples the possible range is 633 to 1580.

In general terms, odour impact is recognised as a symptom that develops as a result of intermittent but regular exposure to odours that are recognisable and have an offensive character. The key factors that contribute to the development of odour annoyance can be usefully summarised by the acronym FIDOL:

- **F**requency of exposure
- **I**ntensity or strength of exposure
- **D**uration of exposure
- **O**ffensiveness
- **L**ocation sensitivity

In acknowledgement of these factors, a number of odour impact criteria have been developed that enable the odour impact risk of proposed facilities to be predicted using dispersion modelling techniques. These criteria are generally defined in terms of a minimum concentration of odour (reflecting the intensity/strength element of FIDOL) that occurs for a defined minimum period of time (reflecting duration and frequency element of FIDOL) over a typical meteorological year. The concentration element of these criteria can be increased or lowered to reflect variations in the offensiveness of the odours released from a specific type of facility, and the sensitivity of nearby sensitive locations.

In the UK, odour impact criteria are generally expressed in terms of a European odour unit concentration that occurs for more than 2% of the hours of a typical meteorological year, and have been designed for application to permanent residential properties which are considered to be the most sensitive from an impact risk perspective.

The most commonly applied criterion from this perspective is the 'Newbiggin criterion'. This criterion was originally introduced into a public inquiry for a new sewage works at Newbiggin-by-the-sea in 1995, and equates to an odour exposure level of 5 European odour units per cubic meter (C_{98} , 1-hour > 5 OU_E/m^3). The Newbiggin criteria has been successfully applied during numerous planning and nuisance assessment studies since 1995 for sewage, waste, food and a range of other industrial and agricultural activities.

These indicative criteria aim to differentiate between odours of different offensiveness, and range from C_{98} , 1-hour > 1.5 OU_E/m^3 (for highly offensive odours) to C_{98} , 1-hour > 6 OU_E/m^3 (for low offensive odours). It should be noted that the sewage treatment sector does not currently fall under the IPPC regime and that these criteria are based on relatively limited data and have not undergone any robust validation in terms of their applicability to the sewage treatment sector in the UK.

The comparison of odour exposure levels generated by the works before and after completion of the proposed sludge dewatering schemes was focused on the Newbiggin criterion (C_{98} , 1-hour = 5 OU_E/m^3), and the most stringent EA criterion (C_{98} , 1-hour = 1.5 OU_E/m^3).

Relative Offensiveness	Indicative Criteria
High	1.5 OU_E/m^3 98 th Percentile (hourly average)
Medium	3 OU_E/m^3 98 th Percentile (hourly average)
Low	6 OU_E/m^3 98 th Percentile (hourly average)

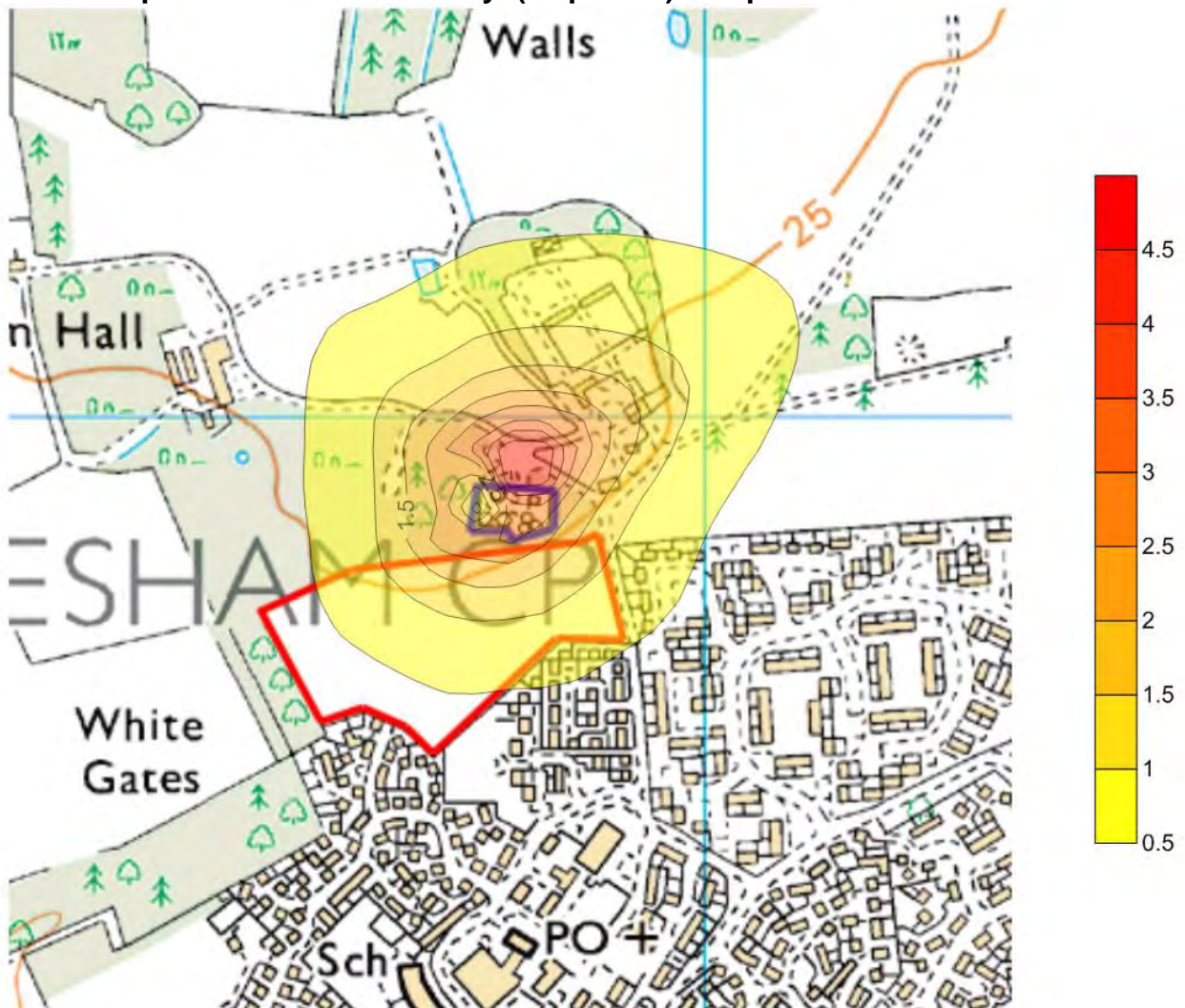
Table 3.1: Previous Historical Laboratory Results

Location	Dimensions	Easting (centre)	Northing (centre)	Emission OU_E/s
Primary Settlement	15m Diameter	633798	253923	252
Bio-Bubble Reactor	12m Diameter	633785	253901	465
Tank 2	12m Diameter	633801	253899	252
Tanks 3,4 & 5	7m Diameter	633826	253899	145

Assessment of Impacts

A Full dispersion model included previous as measured odour emissions rates from a comparable STW. Generic terrain data and annual hourly sequential meteorological data included. Based upon 98th percentile 1 hourly average.

Odour Dispersion Contour Overlay (Map View) 98th percentile



The image above is too small to comfortably display the contour labels, these labels are referenced in alternative boxes.

Odour Dispersion Contour Overlay (Aerial View) 98th percentile



The above image shows the contour overlaid on an overhead aerial photograph

Summary

The air quality impacts in terms of odour concentrations; resulting from the operation of the STW under normal operating conditions have been assessed using an advanced dispersion model software package (ADMS 5). All predicted ground level concentrations of odour were modelled in the near field environment.

All locations within a 2km by 2km area were covered by the model assessment, and it was found that the level of odour concentrations were highest within the boundary of the STW, with little odour visible in the proposed development area, any visible footprint contained within the report are below the threshold of detection $1 \text{ OU}_E/\text{m}^3$.

Model Scenario	Highest odour level (OU_E/m^3)	Lowest odour level (OU_E/m^3)
Standard model (3 year met data) 98 th Percentile	4.5	0.5

The odour impact upon the proposed development and local amenity is considered to be below the recognised threshold of detection. However there is an increased risk of nuisance odour being detected at the Northern boundary of the proposed development.

Relative Offensiveness	Indicative Criteria
High	$1.5 \text{ OU}_E/\text{m}^3$ 98 th Percentile (hourly average)
Medium	$3 \text{ OU}_E/\text{m}^3$ 98 th Percentile (hourly average)
Low	$6 \text{ OU}_E/\text{m}^3$ 98 th Percentile (hourly average)

Where the odour level is expected to be at $1.5 \text{ OU}_E/\text{m}^3$ for a high offensive odour, which is normal for an STW, a “buffer” zone of 30m from the Northern boundary and 200m in length should be considered to cope with any abnormal wind direction or operation at the STW.



The 30m x 200m buffer zone is shown as the red boxed area on the image.

GLOSSARY

1.

Integrated pollution prevention and control (IPPC) H4 Horizontal guidance for odour part 2 – Assessment and control.

A guidance document produced by the Environment Agency and other agencies. Part 2 provides details regarding odour measurement, collection of samples, methodologies etc. currently still in draft format.

3:

Dynamic olfactometry

This is also known as dynamic dilution Olfactometry and is the most commonly used form of odour measurement.

Olfactometry involves the step-wise dilution of a sample of odourous gas with odour-free air and subsequent presentation to a panel of observers in order to determine the number of dilutions for the odour to be just perceived by 50% of the panel.

4:

ADMS

Dedicated software for producing dispersion model data to produce visual indications on the level of odour perceived. Detailed terrain, meteorological and process data can be included to produce an “odour footprint” to overlay on mapping layouts.

Appendix 7

Subject: FW: Report for enquiry 00025173 is now ready

From: Planning Liaison <planningliaison@anglianwater.co.uk>

Sent: 15 December 2017 15:40

To: Leigh Parratt <Leigh.Parratt@parkerplanning.co.uk>

Subject: RE: Report for enquiry 00025173 is now ready

Dear Leigh

Thank you for your email

This WRC was last assessed in 2014 and modelling provided a predicted dispersion range of malodours at concentration of 1.5 OUE/m³. We concluded that this could be reasonably represented by a 110m radius from the centre point of the works (NGR TM3381053911).



On the basis of this we have previously advised that for planning purposes a buffer zone of up to 70m from the southern boundary of Rendlesham WRC would be appropriate when considering sensitive land use.

Kind Regards

Sandra Olim

Pre-Development Advisor

Developer Services

Anglian Water Services Limited

Telephone Office: 03456066087-Option 1

Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT

<http://www.anglianwater.co.uk/developers/growth-and-planning-faqs.aspx>





Suffolk Coastal Local Plan Review Examination Hearings

Matter 3 – Area Specific Strategies – Development Allocations

Hearing Statement on Behalf of Capital Community Developments Ltd. Responding to Inspector's Questions in Respect of Emerging Policy SCLP12.62 Land West of Garden Square, Rendlesham

Addendum

Norfolk Office 01603 516319

Orchard House
Hall Lane
East Tuddenham,
Norfolk, NR20 3LR

Suffolk Office 01284 336348

The Northgate Business Centre,
10 Northgate Street,
Bury St Edmunds,
Suffolk, IP33 1HQ

Essex Office 01245 934184

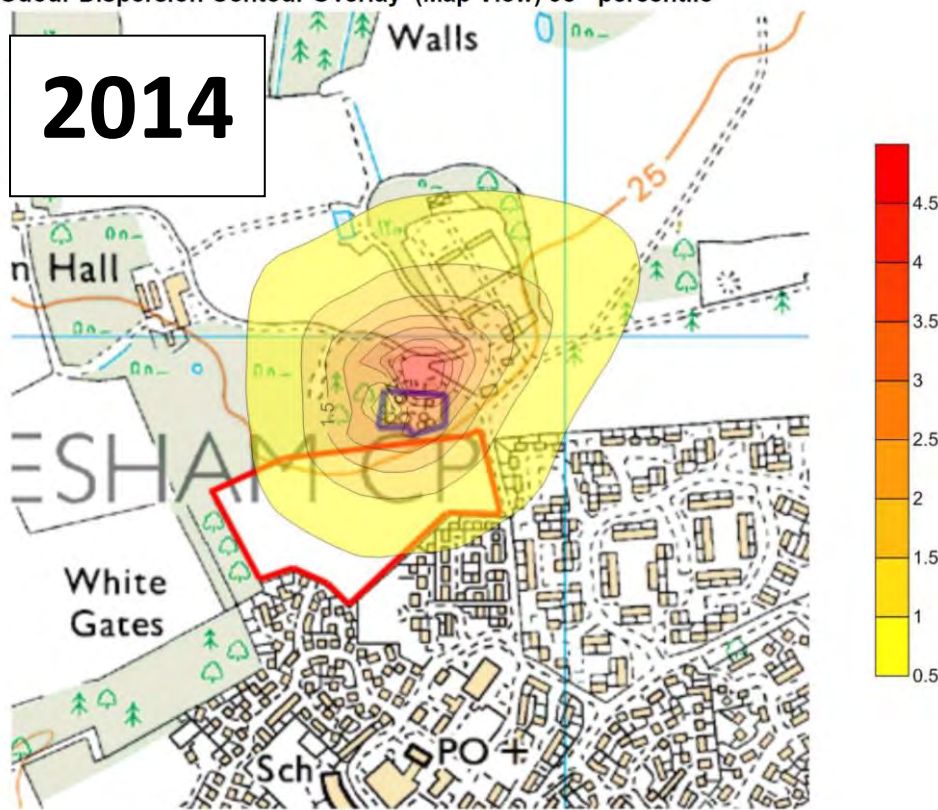
Moulsham Mill,
Parkway,
Chelmsford
Essex, CM2 7PX

1 Addendum

- 1.1 This addendum accompanies our hearing statement and includes a copy of an email from Anglia Water, providing contextual evidence for paragraphs 3.18 to 3.25 of the statement.
- 1.2 As can be seen from this email several issues had been ongoing by 2017 in the Rendlesham area which had been affecting odour levels at the Rendlesham WTC.
- 1.3 In the email Anglia Water say: “these actions will greatly reduce the potential risk of odours in the area”.
- 1.4 It is clear that Anglia Water were correct.
- 1.5 The anomalous and high odour levels recorded in the 2014 assessment (upon which the cordon sanitaire is based) have clearly “**greatly reduced**” by the time of the 2018 assessment and as we are expecting our next assessment to show, will have remained low.
- 1.6 This supports our contention that in 2014 there were ‘outside influences’, later investigated by Anglia Water, which were affected and impairing the performance of the WTC.
- 1.7 For criterion a) to remain part of emerging policy SCLP12.62 the LPA are going to have to provide evidence to justify it.
- 1.8 If criterion a) is removed from emerging policy SCLP12.62 because it is accepted that the cordon sanitaire was either based on an anomaly at the time and/or odour levels have “**greatly reduced**” since, then it is logical to revisit the proposed housing numbers to ensure the site is being promoted efficiently.

Odour Dispersion Contour Overlay (Map View) 98th percentile

2014



2018

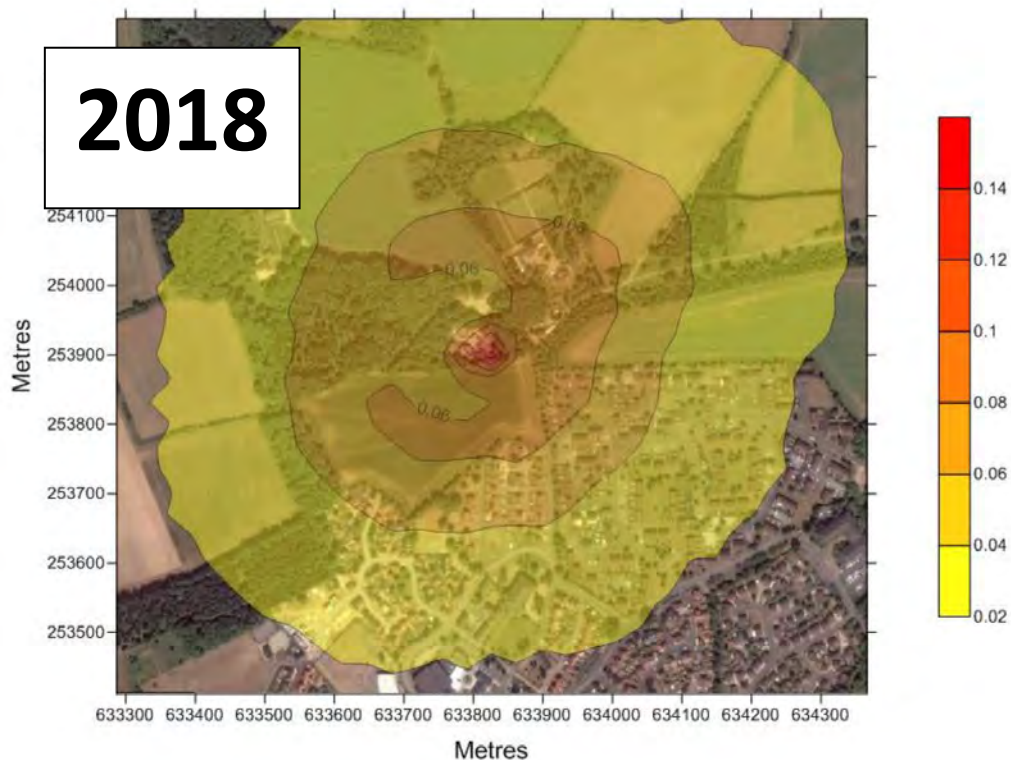


Figure 5 Ground Level Odour Concentrations - Scenario 1

Addendum Appendix

-----Original Message-----

From: "Minter Nigel" <nMinter@anglianwater.co.uk>

Sent: Wednesday, 13 December, 2017 13:35

To: "Diana@manarish.net" <Diana@manarish.net>

Subject: Odour issue

Hi Diana |

Please except my sincere apologies for not getting back to you sooner. Following your initial contact to us and our subsequent meetings I write to confirm the actions taken to alleviate the odour problems you have been experiencing.

To summerise

Our investigations into the sewerage network in Rendlesham we found that high levels of septic sewerage were being discharged into our network from a private pumping station. We also discussed possible issues at the Rendlesham works which may be a cause for odours.

Issue / action taken

- Private pumping station discharge, monitoring within the network whilst working with the site owners and their contractors. Result the site is now being constantly dosed to bring the discharge under control. Owners advised that further monitoring will take place to ensure the discharge is under control and that further breaches may result in legal action being taken against them.
- Inlet chamber at RENDST, following meeting with the Treatment Manager quote to be requested to cover the chamber. Quote received and approved and the inlet chamber has now be covered.
- AW in line pumping stations, these have all been inspected and monitoring of the discharges has taken place no issues with any discharges from all sites.

Whilst we appreciate that these actions will greatly reduce the potential risk of odours in the area, we cannot ever guarantee that odours will not occur due to operational issues at the works, as we have no control of what is disposed of into the main sewerage system.

If you should have any further queries please do not hesitate to contact me on tel: 01473 589045 or mobile: 07801 680136

Yours sincerely

Nigel Minter

Customer Liaison Manager

----- Forwarded Message -----

From: Nina Robinson <nina@hiltonassociates.co.uk>

To: 'Anthony Hardy' <anthony.hardy@parkerplanningservices.co.uk>; 'Nigel Kahn' <nkahn@globalcountry.net>; 'John Darby' <jv@hiltonassociates.co.uk>; richard.johnson@mahandlifeandlifestyle.org.uk; 'Jeanie' <jeaniedunlop@vodafone.co.uk>; tom@hiltonassociates.co.uk

Sent: Wednesday, 19 August 2015, 10:18

Subject: Smells of sewage

Dear all

I have just spoken to Nigel Minter of Anglian Water. The problems seem to have arisen from a series of pumping stations including near the theatre building and near the primary school. Those stations are now under control. There was also, more recently, a serious problem with a pumping station on the Bentwaters estate which is now resolved; Anglian Water have got the owners of the estate to deal with it. If there are any problems in the future please let me know



Suffolk Coastal Local Plan Review Examination Hearings

Matter 3 – Area Specific Strategies – Development Allocations

Hearing Statement on Behalf of Capital Community Developments Ltd. Responding to Inspector's Questions in Respect of Emerging Policy SCLP12.62 Land West of Garden Square, Rendlesham

2nd Addendum

Norfolk Office 01603 516319

Orchard House
Hall Lane
East Tuddenham,
Norfolk, NR20 3LR

Suffolk Office 01284 336348

The Northgate Business Centre,
10 Northgate Street,
Bury St Edmunds,
Suffolk, IP33 1HQ

Essex Office 01245 934184

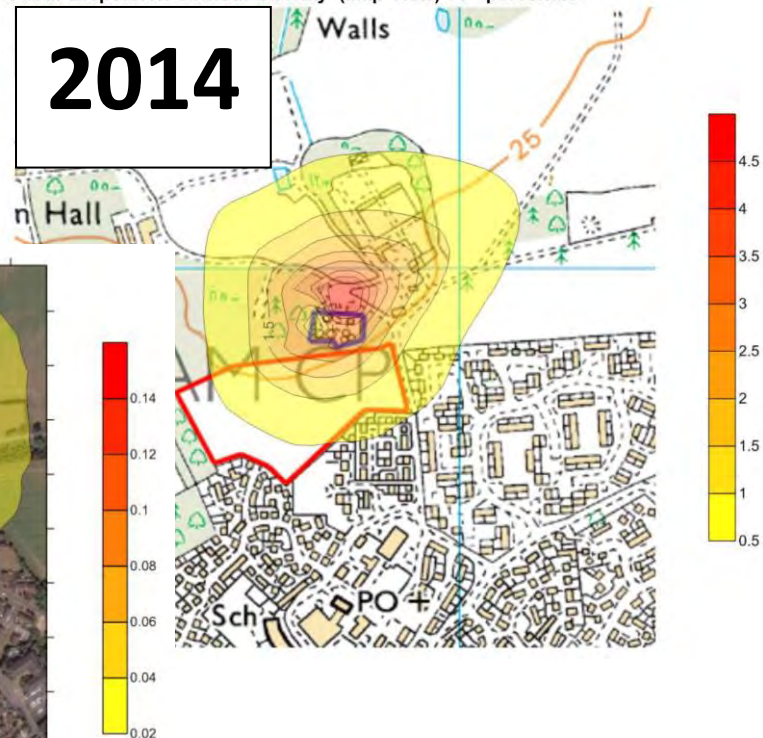
Moulsham Mill,
Parkway,
Chelmsford
Essex, CM2 7PX

1 Addendum 2

- 1.1 This second addendum accompanies our hearing statement and its addendum and includes a copy of the Odour Assessment referred to in paragraph 3.11 of our Matters Statement. We apologise for the late submission of this report, the consultants were awaiting vital data from Anglia Water.
- 1.2 As can be seen from the report (Fig. page 19 and Table 5 page 20) the results of the odour assessment continue to show that under normal working conditions the odour levels from the sewage treatment plant are at least 10 times lower than the statutory nuisance level of 1.5 ouE/m³.
- 1.3 The cordon sanitaire referred to in the emerging policy SCLP12.62 (and the adopted policy SSP12 before it), which originated from the 2014 odour assessment was based on anomalous results caused by the abnormal functioning of the plant; itself caused by industrial pollutants being flushed into the domestic system from the nearby Bentwaters industrial estate.
- 1.4 The cordon sanitaire is based on anomalous data. It was not a limiting factor justifying the reduction of the historic allocation from 75 dwellings to 'approximately 50' in the adopted policy SSP12 and should not be a limiting factor in the emerging policy. There is no evidence to support the retention of the reference to the cordon sanitaire in the emerging policy SCLP12.62.
- 1.5 Criterion a) should be removed from emerging policy SCLP12.62, references to the cordon sanitary, 'land not suitable for building' and other related text should be removed from supporting paragraphs 12.705 and 12.706.
- 1.6 The reference to 'approximately 50 dwellings' in the emerging policy should be corrected to 'approximately 75 dwellings' in order to be sound; reflecting the best evidence.

Odour Dispersion Contour Overlay (Map View) 98th percentile

2014



2018

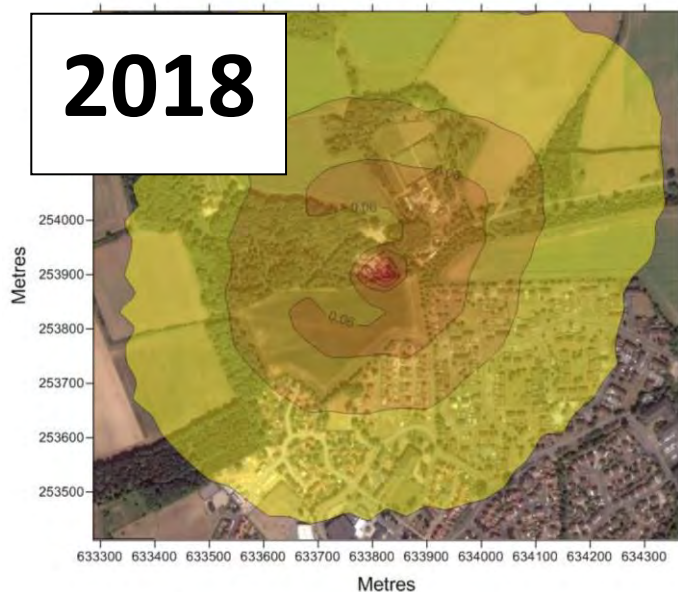
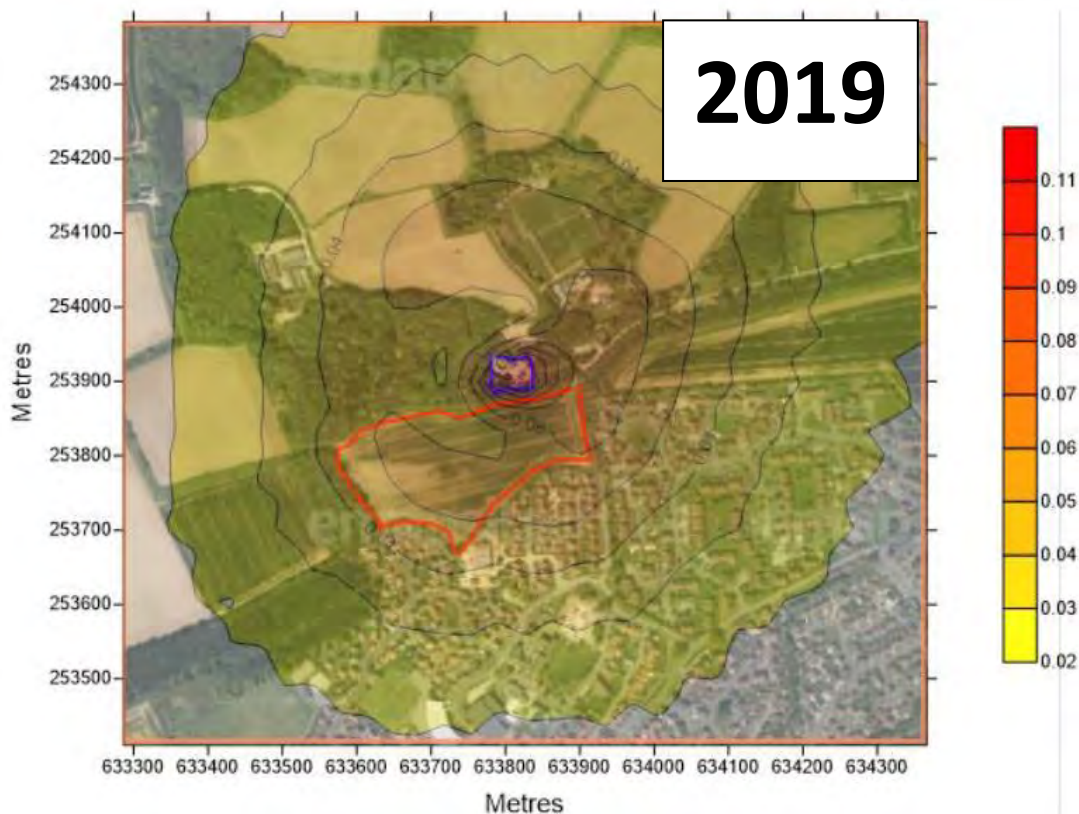


Figure 5 Ground Level Odour Concentrations - Scenario 1

Odour
Concentration

2019



Addendum Appendix

 air quality & monitoring site odour assessment odour dispersion modelling dust monitoring bioaerosol monitoring scentroid equipment

Air Spectrum Environmental Limited

Spectrum Environmental Support

Spectrum House

Checketts Lane

Checketts Lane Industrial Estate

Worcester

WR3 7JW

Aidan Wrynne

Pete Badham

Odour Impact Assessment Capital Community Developments

Anthony Hardy

30 Gardenia Close

Rendlesham

Woodbridge

IP12 2GX

JL 20471

Version 1.0

14/09/2019

 odour lab odour threshold analysis odour management

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ABBREVIATIONS

ASE	Air Spectrum Environmental Limited
BS EN	British Standard European Norm
DEFRA	Department for Environment, Food & Rural Affairs
EA	Environment Agency
IPPC	Integrated Pollution Prevention and Control
NPPF	National Planning Policy Framework
SES	Spectrum Environmental Support
STW	Sewage Treatment Works
UKWIR	UK Water Industry Research
WWTW	Waste Water Treatment Works

EXECUTIVE SUMMARY

Air Spectrum Environmental Ltd (ASE), were commissioned By Capital community developments to undertake an odour dispersion modelling assessment to evaluate the potential odour impact of a Sewage Treatment Works on a proposed site development by Capital Community Developments situated near Jays Croft Road, Rendlesham, Woodbridge IP12 2TQ.

Data entered within the dispersion model was based upon odour emissions data supplied and verified by Anglian Water.

The results of this assessment indicate that ground level odour concentrations at the proposed residential development are well below the $1.5 \text{ ou}_E/\text{m}^3$ 98th percentile (hourly average) limit. Therefore, based on the findings within this assessment, it appears that the proposed residential development would not be subjected to odour nuisance from the STW site.

1.0 INTRODUCTION

1.1 Background

Air Spectrum Environmental Ltd (ASE), were commissioned to undertake an odour dispersion model of a proposed site development by Capital Community Developments situated near Jays Croft Road, Rendlesham, Woodbridge IP12 2TQ. Data entered within the dispersion model was based upon emission data for the Rendlesham Sewage Treatment works, which was supplied by Anglian Water.

Capital Community Developments propose to develop the site into a residential area and have procured ASE to report on the impacts of the odour release from the adjacent STW. The STW is situated to the North of the development in Rendlesham. During the planning stages, concerns have been raised about the off-site odours which may cause nuisance to the future residents of the development.

To assess the risk that off-site odours may cause a nuisance to the future residents of the development, ASE has completed an odour impact assessment for the odour sources identified. ADMS 5 software was used to prepare the dispersion model to quantify the odour risk to the planned development. Figures 1 & 2 display the planned development site and the adjacent STWs.



Figure 1 - Planned Development site layout (2019)

Figure 2 below displays the development site boundary in relation to the sewage treatment works and cordon sanitaire zone.

Figure 2 - Development site boundary in relation to the STW & Cordon Sanitaire Zone



1.2 Limitations

Air Spectrum Environmental Limited has prepared this report for the sole use of the client, showing reasonable skill and care, for the intended purposes as stated in the agreement under which this work was completed.

The report may not be relied upon by any other party without the express agreement of the client. No other warranty, expressed or implied is made as to the professional advice included in this report.

Where any data supplied by the client or from other sources have been used it has been assumed that the information is correct. No responsibility can be accepted by ASE for inaccuracies in the data supplied by any other party. The conclusions and recommendations in this report are based on the assumption that all relevant information has been supplied by those bodies from whom it was requested.

No part of this report may be copied or duplicated without the express permission of ASE and the client.

Where field investigations have been carried out these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the Safety, Health, Environment and Quality Management System of ASE.

2.0 REGULATORY GUIDANCE

2.1 Odour guidance and legislation

There are currently no statutory standards or regulations in the UK for the release and subsequent impacts of odours. This is due to the complexities involved with measuring and assessing odours against compliance criteria, and the inherent subjective nature of odours.

It is recognised that odours have the potential to pose a nuisance for residents living near a source of offensive odour. In these cases, determination of whether or not an odour constitutes a statutory nuisance is usually the responsibility of the local planning authority or the Environment Agency. The Environmental Protection Act 1990 (Stationery Office, 1990) outlines that a local authority can require measures to be taken where:

“Any dust, steam, smell or other effluvia arising on an industrial, trade and business premises and being prejudicial to health or a nuisance...” or

“fumes or gases are emitted from premises so as to be prejudicial to health or cause a nuisance...”

Within the Environment Agency H4 Guidance on Odour Management there are benchmark levels of odour on the site boundary dependent on its offensiveness, ranging between C98, $1.5 \text{ ou}_E/\text{m}^3$ and C98, $1 \text{ hour } 6 \text{ ou}_E/\text{m}^3$. This is due to variations in an odours apparent offensiveness and a receptors sensitivity.

The benchmarks are:

- 1.5 odour units for most offensive odours
- 3 odour units for moderately offensive odours
- 6 odour units for less offensive odours.

2.2 National Planning Policy

The National Planning Policy Framework (NPPF) was published in March 2012. This sets out the Government’s planning policies for England and how they are expected to be applied. In relation to conserving and enhancing the natural environment, paragraph 109 states that:

“The planning system should contribute to and enhance the natural and local environment by..... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.”

Pollution is defined by the NPPF as:

“Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.”

2.3 Odour measurement

Odour exposure and impact can be measured via two methods; by specific compound measurement or; by total odour by dynamic dilution olfactometry.

Specific gas measurement is often used when an emission from a site is dominated by an individual odorous compound, such as hydrogen sulphide at a Waste Water Treatment Works (WWTW). Monitoring of the odorous compound, both at its source and receptor location, can provide a simple evaluation of the odour emission.

Total odour by dynamic dilution olfactometry determines the odour threshold for a complex mixture of chemicals. Odour threshold is a measurement of concentration for an odorous gas. The measurement is achieved by presenting a dilution range of the test gas to a panel of acuity assessed panellists. Panellists indicate when they can detect an odour or not, at each dilution range presented. The detection point is the dilution at which 50 % of the panel can detect an odour, which in turn represents an odour concentration of 1 ou_E/m³. The test sample odour concentration is calculated by multiplying detection concentration (1 ou_E/m³) by the dilution required to achieve detection point. Odour threshold is measured in accordance with BS EN 13725:2003¹ "Determination of odour concentration by dynamic Olfactometry". Once threshold analysis is completed it gives the point of detection of the odour and its apparent strength in ou_E/m³.

For the purposes of this model the odour emission values were given by Anglian Water.

2.4 UK case law

The most commonly applied criterion in relation to odour assessment is the 'Newbiggin criterion'. This criterion was originally introduced into a public inquiry for a new sewage works at Newbiggin-by-the-sea in 1995, defended by Northumbrian Water Limited. It equates to an odour exposure level of 5 European odour units per cubic meter (C98, 1 hour > 5 ou_E/m³). The Newbiggin criterion has been successfully applied during numerous planning and nuisance assessment studies since 1995, for sewage, waste, food and a range of other industrial and agricultural activities.

These indicative criteria aim to differentiate between odours of different offensiveness, and range from C98, 1 hour > 1.5 ou_E/m³ (for highly offensive odours) to C98, 1 hour > 6 ou_E/m³ (for low offensive odours). It should be noted that the sewage treatment sector does not currently fall under the IPPC regime and that these criteria are based on relatively limited data and have not undergone any robust validation in terms of their applicability to the sewage treatment sector in the UK.

The comparison of odour exposure levels generated by the works before and after completion of the proposed sludge dewatering schemes was focused on the Newbiggin criterion (C98, 1 hour = 5 ou_E/m³), and the most stringent EA criterion (C98, 1 hour = 1.5 ou_E/m³).

¹ BS EN 13725:2003 Air Quality – Determination of Odour Concentration by Dynamic Olfactometry

Table 1 Newbiggin criterion

Relative Offensiveness	Indicative Criteria
High	1.5 ou _E /m ³ 98 th percentile (hourly average)
Medium	3 ou _E /m ³ 98 th percentile (hourly average)
Low	6 ou _E /m ³ 98 th percentile (hourly average)

2.5 UK Water Industry Research

A published study by the UK Water Industry Research (UKWIR)² detailed the correlation between the modelled odour impact areas with receptor responses. Published in 2001 the document shows from a study of 9 wastewater treatment works, how the complaints vary:

- At C98, 1 hour 5ou_E/m³ – complaints rare; 3% registered
- Between C98, 1 hour 5ou_E/m³ and C98, 1 hour 10ou_E/m³ – increase in complaints; 38% registered
- Above C98, 1 hour 10ou_E/m³ – significant increase in complaints; 59% registered.

2.6 DEFRA compost guidance

The compost guidance in 2009 relating to good practise and odour control for composting sites (excluding those processing slaughterhouse waste) gives C98, 1 hour 3ou_E/m³ as an odour impact criteria taken from dispersion modelling.

² Odour Control in Wastewater Treatment – A Technical Reference Document. Ref 01/WW/13/3 – UKWIR, 2001
Page 10 of 21

3.0 IMPACT ASSESSMENT METHOD

3.1 Odour emission sources

A desktop study revealed two potential odour sources which are in close proximity to the proposed development site at Rendlesham. Firstly, the Anglian Water STW to the North of the development site and secondly, the Stokes Sauces factory to the North-East. Within this study only the STW has been considered in the dispersion model. The sauce factory has been omitted because the operation is small and is deemed to have negligible effect.

The odour emission data used in the dispersion model was supplied and verified by Anglian Water. This data is presented in table 2 below.

Table 2 Odour Emission Data

Name	Shape	No	L (m)	W (m)	Dia (m)	Elev (m AOD)	Area (m ²)	Emission rate (ou _E /m ² /s)	Comments
Inlet works reception chamber	circular	1	N/A	N/A	1.5	27	1.8	50	UKWIR: typical rate to reflect pumped flow
Screenings skip	rectangular	1	3	2	N/A	27	6.0	20	AW internally derived from model library
Screen chamber	rectangular	1	10	2.5	N/A	30	25.0	20	UKWIR: low rate to reflect low risk of septicity
Balance tank	circular	1	N/A	N/A	15	30	176.6	0.8	Use UKWIR low rate for PST to reflect diffused air and no settlement
Bio-bubble reactor 1	circular	1	N/A	N/A	13	32	132.7	4	Use UKWIR typical rate for activated sludge plant
Bio-bubble reactor 2	circular	1	N/A	N/A	13	32	132.7	4	Use UKWIR typical rate for activated sludge plant
Bio-bubble desludging chambers	rectangular	2	1	1	N/A	27	2.0	140	Use UKWIR low rate for agitated raw sludge to reflect aerobic process
Sludge storage tank	circular	1	N/A	N/A	3	29	7.1	40	Use UKWIR low rate for quiescent raw sludge to reflect aerobic process
New sludge storage tank	circular	1	N/A	N/A	7.5	29	44.2	40	Use UKWIR low rate for quiescent raw sludge to reflect aerobic process
Wash water storage tank	circular	1	N/A	N/A	7.5	0.3	44.2	0.3	Use UKWIR low rate for final tank
Attenuation tank	Circular	1	N/A	N/A	7.5	0.3	44.2	0.3	Use UKWIR low rate for final tank

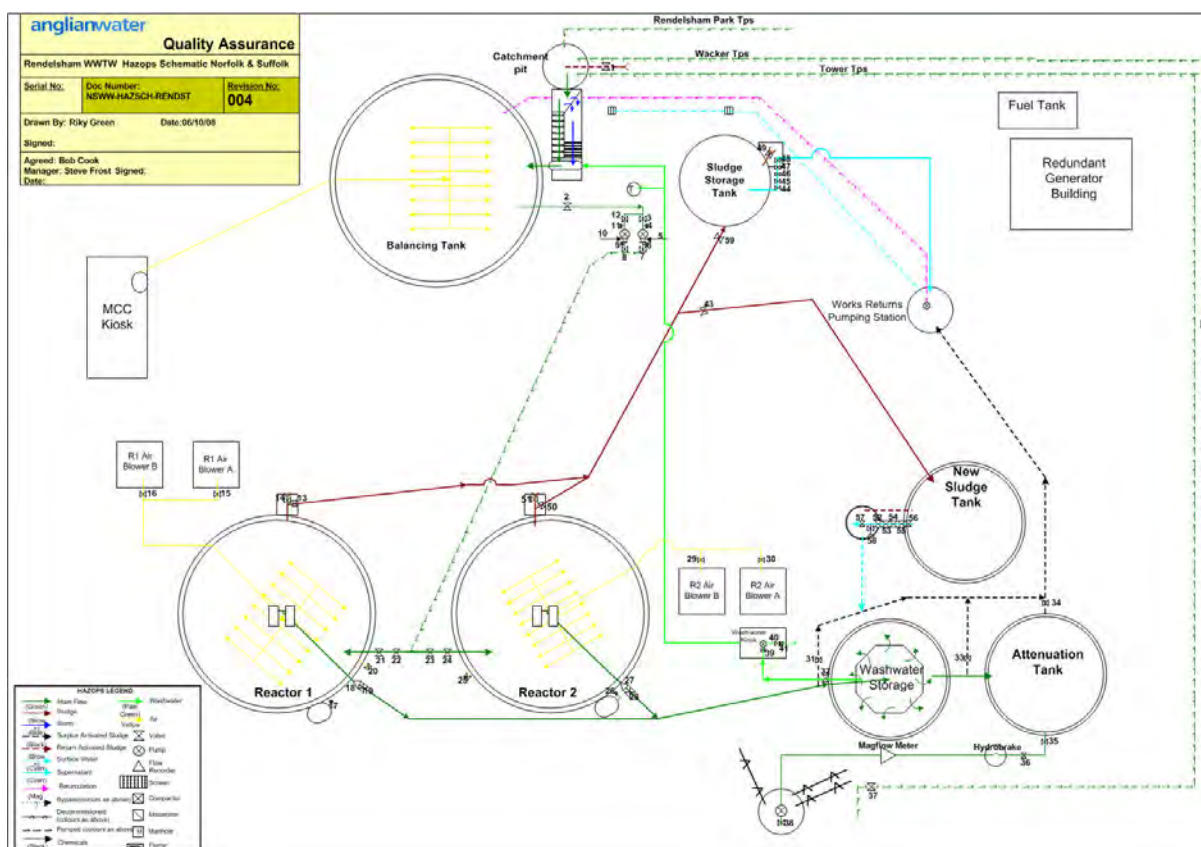


Figure 3 Rendlesham STW Site Schematic

3.2 Receptor locations

Within this assessment 4 receptor locations have been used to predict ground level odour concentration across the planned site. The receptor locations have been chosen to represent two locations within the cordon sanitaire zone of the site and two further locations situated in other areas of the site.



Figure 4 – Receptor location map

Table 3 Receptor locations

Receptor		Location	
		x	y
R1	Northern edge of cordon sanitaire	633813	253868
R2	Westerly section of cordon sanitaire	633769	253840
R3	Western area of development site	633603	253811
R4	Centre of development site	633738	253717

3.3 Meteorological data

The relevant meteorological data used was from Wattisham, following discussions with the data provider. The proposed site is approximately 30 km from the weather station and contained all relevant weather parameters used within the model for the 5 years' worth of data required. The years covered in this assessment are 2014-2018.

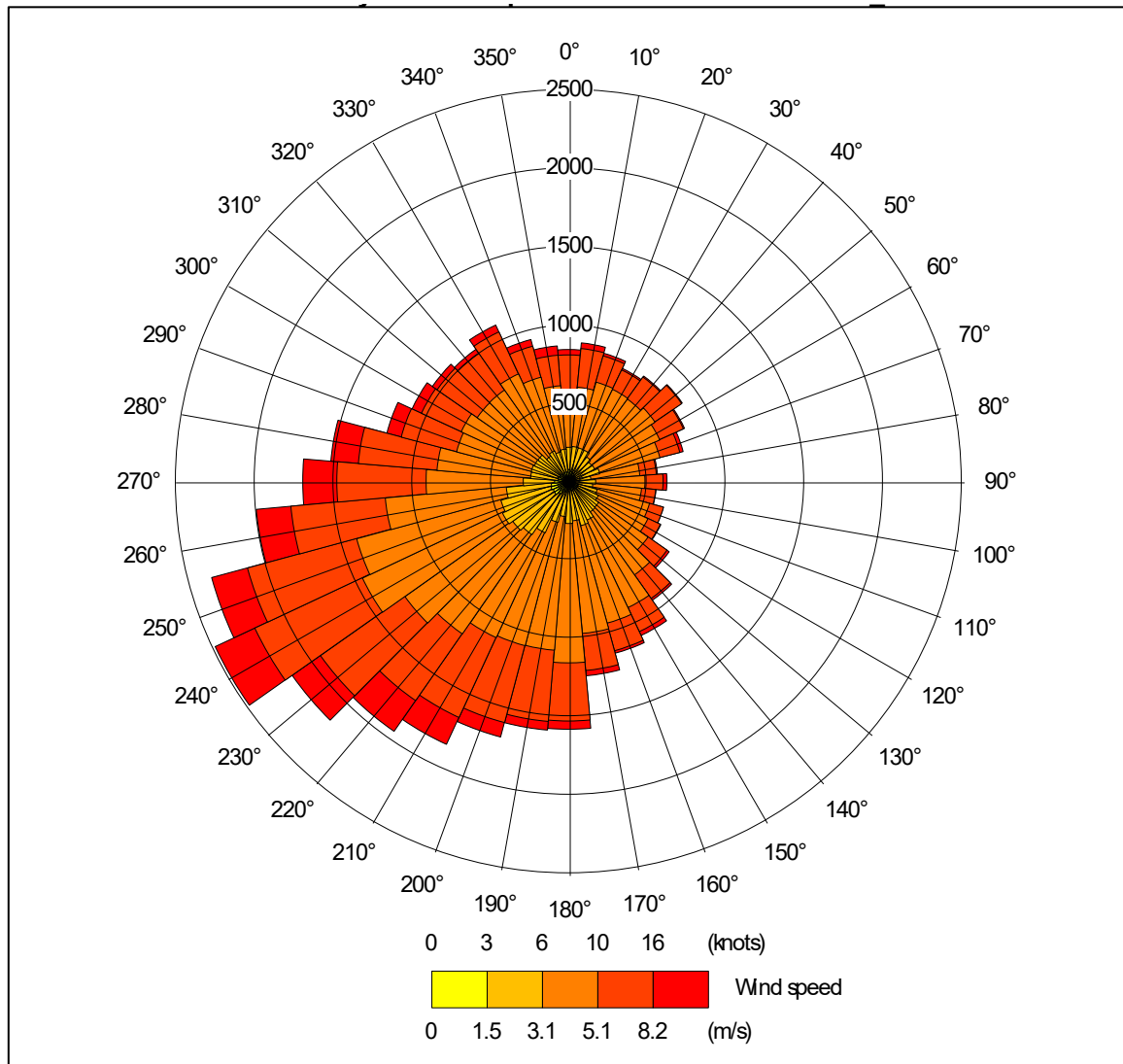


Figure 5 Windrose data for Wattisham 2014-2018

3.4 Dispersion model inputs

The dispersion model was run using the input parameters which are detailed in Table 4.

Table 4 Model input parameters

Parameter	Source Type	Central Location		Emission Velocity	Flow Rate	Total Emission Rate
		x	y	m/s	m ³ /s	OU _E /s
Inlet works Reception Chamber	Point	633806	253927	0.1	0.177	90
Screenings Skip	Line	633823 633827	253922 253922	0.1	0.079	20
Screen Chamber	Line	633806 633804	253925 253916	0.1	0.079	60
Balance Tank	Area	633796 633803 633793 633788	253930 253920 253918 253925	0.1	17.671	2.4
Bio-bubble reactor 1	Point	633783	253899	0	0	12
Bio-bubble reactor 2	Point	633801	253897	0	0	12
Bio-bubble desludging chambers	Point	633779 633791	253911 253907	0.1	0.079	420 420
Sludge Storage Tank	Point	633813	253919	0.1	0.707	120
New Sludge Storage Tank	Point	633822	253904	0.1	4.418	120
Wash water Storage Tank	Point	633819	253892	0.1	4.418	1.2
Attenuation Tank	Point	633829	253895	0.1	4.418	1.2

All input locations are based on estimates made using satellite images and cannot be verified as being accurate. All sources have been modelled to emit 24 hours a day to ensure worst case scenario is predicted.

3.5 Dispersion model scenarios

To characterise the impact of the odour emissions from the STW, a single scenario was modelled:

- Scenario 1 – All sources considered. No near field buildings included (including proposed buildings) and odour emission rates as defined in Table 4.

3.6 Modelling software

The site information was input into ADMS to determine the relationship between the STW and the proposed development land. Emission data and meteorological data was then fed into the model to enable prediction of the level of exposure to odours at locations surrounding the site under the normal operational regime for the facility. The results of the modelling are presented in the form of contours (or isopleths - lines connecting points with equal frequency of occurrence) for a 1-hour average limit concentration of x_{ouE}/m^3 as a 98% (percentile) ($C98, 1\text{ hour} = X_{ouE}/m^3$) which defines the area where odour nuisance may occur.

ADMS³ is a state-of-the-science dispersion modelling system that simulates essential atmospheric physical processes and provides refined concentration estimates over a wide range of meteorological conditions and modelling scenarios. It is based on atmospheric boundary layer turbulence structure and scaling concepts, including treatment of multiple ground-level and elevated point, area and volume sources. It handles flat or complex, rural or urban terrain and includes algorithms for building effects and plume penetration of inversions aloft. It uses Gaussian dispersion for stable atmospheric conditions (*i.e.*, low turbulence) and non-Gaussian dispersion for unstable conditions (high turbulence).

ADMS includes two data pre-processors for streamlining data input. A meteorological pre-processor, computes boundary layer and other necessary parameters for use with ADMS and uses standard hourly sequential data supplied from the UK Met Office. There is also a terrain pre-processor option that simplifies the computation of receptor elevations and effective height scales for numerous types of digital data formats, including OS Landform Panorama digital terrain maps. The model is considered appropriate by the UK Environment Agency for assessments of the nature described in this report

³ Software used: ADMS 5.1 model version: 5.1.2.0.

3.7 Odour impact assessment criteria

The objective of this assessment was to establish whether the odour emissions resulting from the STW at Rendlesham would result in predicted odour nuisance at the proposed residential development.

Taking into consideration the guidance discussed we assume that sensitive receptors would be able to detect odour resulting from the STW at between 1.5 - 3 ou_E/m³, and odours above 3 ou_E/m³ 98th percentile would cause nuisance.

3.8 Odour modelling uncertainties

Uncertainty in dispersion modelling predictions can be associated with a variety of factors, such as:

- **measurement error** – error in input data, including emission estimates, operational procedures, land use characteristics and meteorology which can be detected and corrected;
- **systematic error** – unnoticed error which may occur during the sampling (data collection);
- **model uncertainty** – model limitations and assumptions based on which it was computed;
- **inherent randomness** – knowledge of starting conditions does not result in certainty related to the final modelling outcome;
- **natural variation** – change in time and place in natural systems;
- **subjective judgement** – data interpretation, especially when data is scarce.

Potential uncertainties in the model results were minimised as far as practicable and worst-case inputs used to provide an accurate assessment. This included the following:

- choice of model - ADMS-5 is a commonly used atmospheric dispersion model and results have been verified through a number of studies to ensure predictions are as accurate as possible; in the UK odour assessments are almost exclusively undertaken using the ADMS or AERMOD models;
- meteorological data - modelling was undertaken using meteorological data set from an observation site within 30 km of the facility to take account of local conditions; a few years of data minimise the risk of inclusion of abnormal weather conditions;
- plant operating conditions - SES have attempted to model information in the worst-case scenario, where all considered odour sources emit constantly;
- emission rates - emission rates were derived from monitoring undertaken at similar facilities. As such, they are considered to be representative of potential releases during normal operation;

-
- sensitive receptor locations - a Cartesian grid was included in the model to provide suitable data for contour plotting. Receptor points were also included at sensitive locations to provide additional consideration of these areas; and,
 - variability - all model inputs are as accurate as possible and worst-case conditions were considered as necessary to ensure a robust assessment of potential pollutant concentrations.

Results were considered in the context of the relevant odour benchmark level and IAQM criteria. It is considered that the use of the stated measures to reduce uncertainty and the use of worst-case assumptions when necessary has resulted in model accuracy of an acceptable level.

4.0 CONTOUR MAPS

Within this section the long term 98th percentile ground level odour concentrations are presented as a contour map overlayed over a base map of the local area. The colour graded key represents ground level odour concentrations ($C_{98, 1\text{-hour}} \times \text{ou}_E/\text{m}^3$) at the specific point with odour concentrations increasing as the colour turns yellow to red.

4.1 Long term 98th percentile odour concentrations as a result of normal operations of the Anglian Water STW.

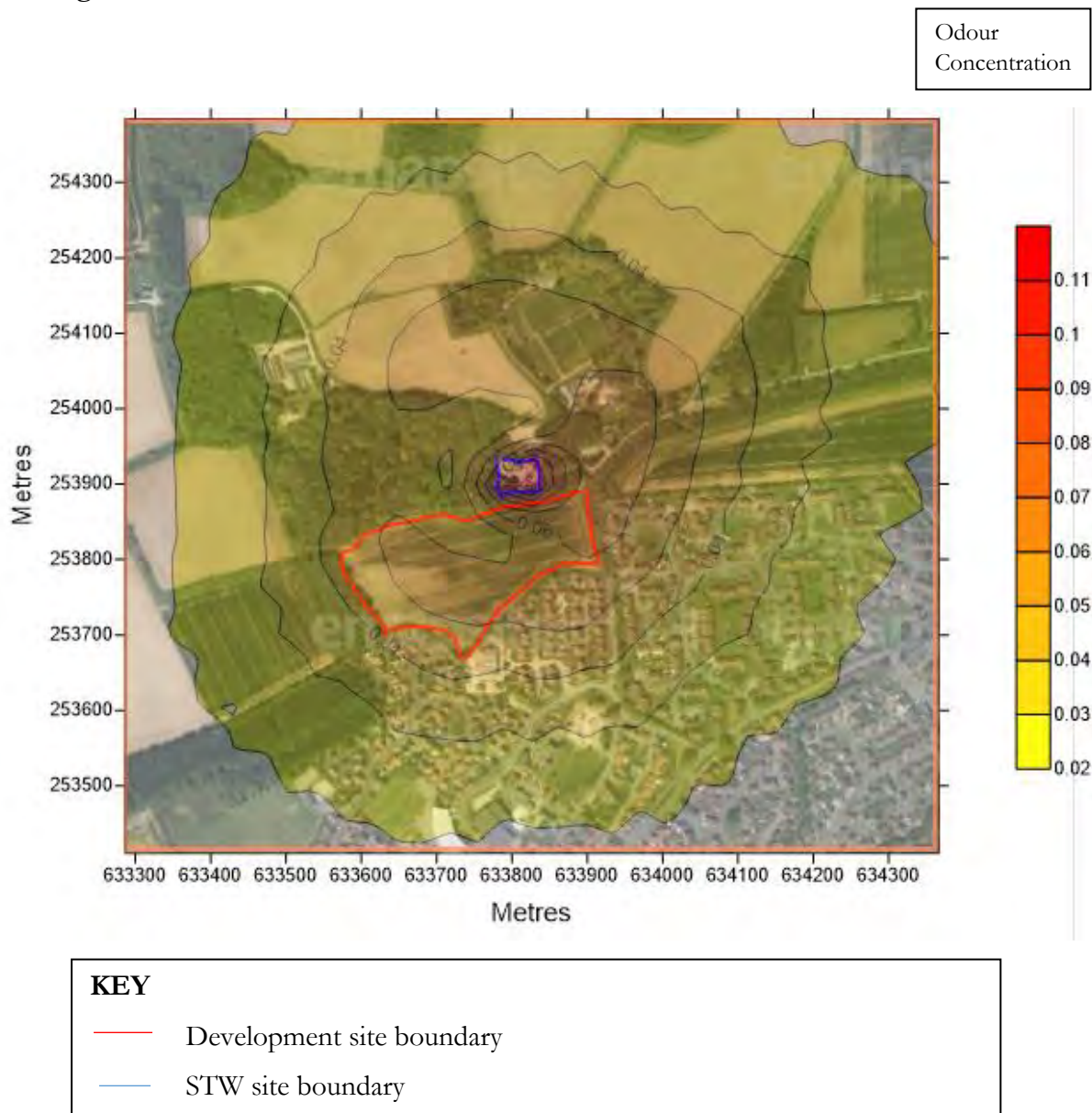


Figure 6 Ground Level Odour Concentrations - Scenario 1

5.0 ASSESSMENT OF IMPACTS

Based on the findings within this assessment, it appears that the proposed residential development would not be subjected to odour nuisance from the STW site.

Table 5 details the ground level odour concentrations for the scenario that has been run in ADMS. Where odour levels fall above $C98, 1 \text{ hour} = 1.5 \text{ ou}_E/\text{m}^3$ the table cell is highlighted in pink, indicating the likely chance of odour nuisance at that receptor.

Table 5 Receptor ground level odour concentrations

Receptor Name	Ground Level Concentration ($C98, 1 \text{ hour} \times$ ou_E/m^3) Scenario 1	Odour nuisance benchmark level (ou_E/m^3)
R1 – Northern section of cordon sanitaire zone	0.072	1.5
R2 – Wester section of cordon sanitaire zone	0.050	
R3 – Western area of whole development site	0.048	
R4 – Central area of whole development site	0.051	

The predicted long-term 98th percentile odour concentrations at the receptors located within the cordon sanitaire zone were all considerably lower than the benchmark odour nuisance limit of $1.5 \text{ ou}_E/\text{m}^3$. The maximum long-term 98th percentile odour concentration that was predicted throughout the whole of the modelled area was $0.12 \text{ ou}_E/\text{m}^3$. This again is below the benchmark odour nuisance limit of $1.5 \text{ ou}_E/\text{m}^3$.

The findings from this assessment, indicate that the future occupants of the proposed development site would not be subject to odour nuisance. However, the odour emission measurements which were supplied by Anglian Water may be greater or less than what has been modelled.

APPENDIX

BS EN 13725:2003 Air Quality – Determination of Odour Concentration by Dynamic Olfactometry

Odour Control in Wastewater Treatment – A Technical Reference Document. Ref 01/WW/13/3 – UKWIR, 2001

Software used: ADMS 5.1 model version: 5.1.2.0.

Appendix X ii

BUILDING FOR LIFE 12



• BUILT FOR LIFE •

**The sign of a good
place to live**

www.builtforlifehomes.org



**By David Birkbeck and
Stefan Kruczkowski**

**Edited by Paul Collins and
Brian Quinn**

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This (Third) edition edited by **Garry Hall** of Urban Forward, **Brian Quinn** of Cabe at the Design Council, and **Paul Collins** of Nottingham Trent University.



Building for Life 12 is a government-endorsed industry standard for well-designed homes and neighbourhoods. Local communities, local authorities and developers are encouraged to use it to guide discussions about creating good places to live.

Building for Life 12 (BfL12) is led by three partners:
Cabe at the Design Council, Design for Homes and the **Home Builders Federation**, supported by **Nottingham Trent University**.

It was redesigned in 2012 to reflect the National Planning Policy Framework's commitment not only to build more homes, but better homes, such as can be achieved when local communities participate in the place-making process and help identify how development can be shaped to accommodate both new and existing communities.

The questions are therefore designed to help structure discussions between local communities, local planning authorities, developers and other stakeholders*.

BfL12 is also designed to help local planning authorities assess the quality of proposed and completed developments; it can be used for site-specific briefs and can also help to structure design codes and local design policies.

Based on BfL12's 'traffic light' system, developments that achieve 9 'greens' are eligible for '**Built for Life™**' accreditation. '**Built for Life™**' accreditation is a quality mark available immediately after planning approval, offering developers the opportunity to promote the quality of their developments during sales and marketing activity. It will also help those seeking a home to find a place to live which has been designed to have the best possible chance of becoming a popular and desirable neighbourhood.

Built for Life™ quality mark is the sign of a good (or better) place to live but the ambition of the Built for Life partnership is to encourage hundreds of developments built across the country to use this standard for their design. Some of these will be good enough to achieve 12 greens or the Built for Life 'Outstanding' and these will form the basis for an awards programme honouring the 'best of the best'.

In April 2014, **builtforlifelifehomes.org** was launched to help homebuyers find their ideal place to live and to showcase developments that have achieved **Built For Life™**.

* According to the Farrell Review (2014), a government-commissioned inquiry into design quality by an independent panel of notable experts, BfL12 can help in creating a "collective vision shaped in collaboration with local communities, neighbourhood forums and PLACE Review Panels." www.farrellreview.co.uk
Accessed 31.3.2014





• BUILT FOR LIFE •

Securing Built for Life™ Accreditation

Simple, transparent, efficient

The **Building for Life** campaign is about guiding the better planning of new development through urban design that is safe and provides everything that should be expected of a new community.

Urban design is about the spaces between and around new homes that can sometimes be overlooked by focusing on the building and its interior, but which are vital to the quality of a place, its attractiveness, functionality and feelings of safety.

The **Built for Life™** criteria represent a Q&A checklist for the quality of placemaking and, when done well, are a clear indicator of a development's potential to grow into a popular new address.

The spaces around new homes and other buildings, often known as the public realm, have to be designed intelligently, treated with the same attention as the homes and made safe and attractive.

We believe most of the 12 urban design criteria we promote with **Building for Life** should be readily achievable. Developers which achieve at least 9 of them are eligible for our special **Built for Life™**

quality mark that indicates the scheme has been assessed as achieving these placemaking essentials. Here's a quick introduction to some of the themes we believe are fundamental to successful new development:

The development should have obvious character, based either on contemporary architecture or local traditions in building materials and landscaping (Q5).

Car parking should be adequate and located where it is accessible and likely to be well used (Q10).

Footways and paths should always be located in places where homes overlook them so no-one feels at risk when using them, especially after dark (Q1, Q7, Q8).

Bus stops and car parking should not be placed remotely where a lack of overlooking might make crime easier to get away with. Closer bus stops also encourage shifts to more sustainable forms of transport (Q1, Q3, Q10).



Clean, contemporary architecture combined with convenient parking and a pedestrian-friendly street helped Manor Kingsway, Derby win one of our first Built for Life™ 'outstanding' awards.

Properties should have clear indications of what is privately owned space and what is shared public realm so passers-by respect the boundaries and residents feel their personal space is protected (Q7, Q11).

Homes should have appropriate external storage, in particular for bins and bicycles, so that neither are left in the open (Q12).

Schemes that address the above themes and more achieve the **Built for Life™** quality mark. New developments that achieve 9 from the 12 Building for Life questions are eligible to display the **Built for Life™** quality mark, helping homebuyers choose with confidence.

A development achieving 'green' on all 12 of the **Building for Life** questions will be eligible to be awarded **Built for Life™ 'Outstanding'**, and the best new housing across the country will be recognised at events organised by the Building for Life Partnership.



The Built for Life™ quality mark helps developers showcase their best new housing developments whilst helping homebuyers choose the best places to live.

Built for Life™ accreditations are awarded through an independent assessment process, guaranteeing impartiality and helping to ensure developments in all parts of the country are judged by the same high quality standards.

Assessments are undertaken by **Built for Life™ Forums** of experts local to the scheme, helping to make each assessment sensitive to its context, history and future need.



How to use BfL12

BfL12 comprises of 12 easy to understand questions that are designed to be used as a way of structuring discussions about a proposed development. There are four questions in each of the three chapters:

- **Integrating into the neighbourhood**
- **Creating a place**
- **Street and home**

Based on a simple 'traffic light' system

(red, amber and green) we recommend that proposed new developments aim to:

- Secure as many 'greens' as possible,
- Minimise the number of 'ambers' and;
- Avoid 'reds'.

The more 'greens' that are achieved, the better a development will be.

A red light gives warning that a particular aspect of a proposed development needs to be reconsidered.

A proposed development might not achieve 12 'greens' for a variety of reasons⁴. What is important is to always avoid 'reds' and challenge 'ambers' - can they be raised to a 'green'? Local circumstances such as the need for housing for local people in rural locations (for example, rural exception

sites) may justify waiving the requirement for 'greens' against the relevant questions. Third party land ownership issues may prevent ideal connectivity from being achieved, however all developments should seek to 'future proof' connections to allow the opportunity to provide these links at some point in the future. Waivers should be supported by the local planning authority and highlighted early in the design process. We would not recommend that any scheme is permitted a waiver against any questions within the 'Creating a place' and 'Street and home' chapters.

For these reasons, whilst we encourage local authorities to adopt BfL12, we recommend that they avoid explicitly setting a requirement for all proposed developments to achieve 12 'greens'. Instead, we recommend that local policies require all proposed developments to use BfL12 as a design tool throughout the planning process with schemes performing 'positively' against it.

We also recommend that local authorities consider expecting developments to demonstrate they are targeting BfL12 where applications for outline planning permission is granted. A useful way to express this expectation is through either a condition or 'note to applicant'.



Homes facing the street, with public and private spaces clearly defined by a retained and sensitively restored stone wall

(DeLacy Court, Castle Donnington)

Simpler, easier and better

Each headline question is followed by a series of additional questions that we suggest are useful to ask at the start of the design process. We've also provided five recommendations for how you might respond with the aim of offering a range of responses.

Recommendations are designed to stimulate discussion with local communities, the project team, the local authority and other stakeholders to help you find the right solution locally.

We've travelled the country visiting hundreds of residential developments. During these visits, we found common problems. Our avoidance tips help you avoid these pitfalls. We also discovered many well-designed developments, their qualities have been captured in our recommendations.

Finally, we've added endnotes providing further detail, clarity and where appropriate, references that you may find useful.

Integrating into the neighbourhood

1 Connections

Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones, while also respecting existing buildings and land uses around the development site?

2 Facilities and services

Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?

3 Public transport

Does the scheme have good access to public transport to help reduce car dependency?

4 Meeting local housing requirements

Does the development have a mix of housing types and tenures that suit local requirements?

Creating a place

5 Character

Does the scheme create a place with a locally inspired or otherwise distinctive character?

6 Working with the site and its context

Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and microclimates?

7 Creating well defined streets and spaces

Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well?

8 Easy to find your way around

Is the scheme designed to make it easy to find your way around?

Street & home

9 Streets for all

Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?

10 Car parking

Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?

11 Public and private spaces

Will public and private spaces be clearly defined and designed to be attractive, well managed and safe?

12 External storage and amenity space

Is there adequate external storage space for bins and recycling as well as vehicles and cycles?

1 Connections

Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones, while also respecting existing buildings and land uses around the development site?

1a Where should vehicles come in and out of the development?

1b Should there be pedestrian and cycle only routes into and through the development?
If so, where should they go?

1c Where should new streets be placed, could they be used to cross the development site and help create linkages across the scheme and into the existing neighbourhood and surrounding places?

1d How should the new development relate to existing development? What should happen at the edges of the development site?

We recommend

Thinking about where connections can and should be made; and about how best the new development can integrate into the existing neighbourhood rather than creating an inward looking cul-de-sac development.

Remembering that people who live within a new development and people who live nearby may want to walk through the development to get somewhere else, so carefully consider how a development can contribute towards creating a more walkable neighbourhood.

Thinking carefully before blocking or redirecting existing routes, particularly where these are well used.

Creating connections that are attractive, well lit, direct, easy to navigate, well overlooked and safe.

Ensuring that all streets and pedestrian/cycle only routes pass in front of people's homes, rather than to the rear of them.

We recommend that you avoid

Not considering how the layout of a development could be designed to improve connectivity across the wider neighbourhood.

Not considering where future connections might need to be made - or could be provided - in the future.



A choice of safe, direct and attractive routes can encourage walking and cycling, particularly for shorter journeys

2 Facilities and services

Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?

2a Are there enough facilities and services in the local area to support the development? If not, what is needed?

Where new facilities are proposed:

2b Are these facilities what the area needs?

2c Are these new facilities located in the right place? If not, where should they go?

2d Does the layout encourage walking, cycling or using public transport to reach them?

We recommend

Planning development so that everyday facilities and services are located within a short walk of people's homes. The layout of a development and the quality of connections it provides can make a significant impact on walking distances and people's travel choices.

Providing access to facilities through the provision of safe, convenient and direct paths or cycle routes.

Consider whether there are any barriers to pedestrian/cycle access (for example, busy roads with a lack of crossing points) and how these barriers can be removed or lessened.

Locating new facilities⁵ (if provided) where the greatest number of existing and new residents can access them easily, recognising that this may be at the edge of a new development or on a through route; but consider whether existing facilities can be enhanced before proposing new ones.

Where new local centres⁶ are provided, design these as vibrant places with smaller shops combined with residential accommodation above (rather than a single storey, single use supermarket building). Work to integrate these facilities into the fabric of the wider development to avoid creating an isolated retail park type environment dominated by car parking and highways infrastructure.

Creating new places within a development where people can meet each other such as public spaces, community buildings, cafes and restaurants. Aim to get these delivered as early as possible. Think carefully about how spaces could be used and design them with flexibility



A mix of uses including homes, shops and other facilities in Lawley, Telford

in mind, considering where more active spaces should be located so as to avoid creating potential conflict between users and adjacent residents.

We recommend that you avoid

Locating play areas directly in front of people's homes where they may become a source of tension due to potential for noise and nuisance. Carefully consider the distance between play equipment and homes in addition to the type of play equipment selected and the target age group.

Creating the potential for future conflict if residential uses and commercial premises are not combined thoughtfully.

3 Public transport

Does the scheme have good access to public transport to help reduce car dependency?

3a What can the development do to encourage more people (both existing and new residents) to use public transport more often?

3b Where should new public transport stops be located?

We recommend

Maximising the number of homes on sites that are close to good, high frequency public transport routes, but ensure that this does not compromise the wider design qualities of the scheme and its relationship with its surroundings. 'Hail and ride' schemes agreed with public transport providers can help reduce the distance people need to walk between their home and public transport.

Carefully considering the layout and orientation of routes to provide as many people as possible with the quickest, safest, attractive and most convenient possible routes between homes and public transport.

Considering how the layout of the development can maximise the number of homes within a short walk from their nearest bus, tram or train stop where new public transport routes are planned to pass through the development. Locate public transport stops in well used places, ensuring that they are accessible for all, well overlooked and lit.

Considering how the development can contribute towards encouraging more sustainable travel choices, for example by establishing a residents car club, providing electric car charging points, creating live/work units or homes that include space for a home office.

Exploring opportunities to reduce car miles⁵ through supporting new or existing park and ride schemes or supporting the concept of transit orientated developments (where higher density and/or mixed use development is centred on train or tram stations).

We recommend that you avoid

Thinking about development sites in isolation from their surroundings. For example, bus only routes (or bus plugs) can be used to connect a new development to an existing development and create a more viable bus service without creating a 'rat run' for cars.

People will use buses if bus stops are close to their homes



4 Meeting local housing requirements

Does the development have a mix of housing types and tenures that suit local requirements?

4a What types of homes, tenure and price range are needed in the area (for example, starter homes, family homes or homes for those downsizing)?

4b Is there a need for different types of home ownership (such as part buy and part rent) or rented properties to help people on lower incomes?

4c Are the different types and tenures spatially integrated to create a cohesive community?

We recommend

Demonstrating how the scheme's housing mix is justified with regard to planning policy, the local context and viability.

Aiming for a housing mix that will create a broad-based community.

Considering how to incorporate a range of property sizes and types⁶, avoiding creating too many larger or too many smaller homes from being grouped together.

Providing starter homes and homes for the elderly or downsizing households. People who are retired can help enliven a place during the working day. Providing for downsizing households can also help to rebalance

the housing market and may help reduce the need for affordable housing contributions over time.

Designing homes and streets to be tenure-blind, so that it is not easy to differentiate between homes that are private and those that are shared ownership or rented.

We recommend that you avoid

Developments that create homes for one market segment unless the development is very small.

Using exterior features that enable people to easily identify market sale from rented/shared ownership homes, such as the treatment of garages or entrances.

Reducing the level of parking provision for rented/shared ownership homes.



A mix of homes can help to provide a more balanced community

5 character

Does the scheme create a place with a locally inspired or otherwise distinctive character?

5a How can the development be designed to have a local or distinctive identity?

5b Are there any distinctive characteristics within the area, such as building shapes, styles, colours and materials or the character of streets and spaces that the development should draw inspiration from?

We recommend

Identifying whether there are any architectural, landscape or other features, such as special materials that give a place a distinctive sense of character as a starting point for design. It may be possible to adapt elevations of standard house types to complement local character.



Architecture and green space works together to generate character in Bristol

Distinctiveness can also be delivered through new designs that respond to local characteristics in a contemporary way⁷.

Exploring what could be done to start to give a place a locally inspired identity if an area lacks a distinctive character or where there is no overarching character.

Landscaping traditions are often fundamental to character, especially boundary treatments.

Introducing building styles, details and landscaping features that can be easily expressed to someone visiting the development for the first time. Where an area has a strong and positive local identity, consider using this as a cue to reinforce the place's overall character⁸.

Varying the density, built form and appearance or style of development to help create areas with different character within larger developments. Using a range of features⁹ will help to create town and cityscape elements that can give a place a sense of identity and will help people find their way around. Subtle detailing can help reinforce the character of areas and in doing so, provide a level of richness and delight.

Working with the local planning and highway authority to investigate whether local or otherwise different materials can be used in place of standard highways surface materials and traffic furniture. Be creative and adventurous by exploring the potential to innovate - develop new ideas and build with new materials.

We recommend that you avoid

Using the lack of local character as a justification for further nondescript or placeless development.

Ignoring local traditions or character without robust justification.

Too many identical or similar house types (where there is no benefit to the overall architectural integrity of the scheme from repetition).

6 Working with the site and its context

Does the scheme take advantage of existing topography, landscape features (including water courses), trees and plants, wildlife habitats, existing buildings, site orientation and microclimate?

6a Are there any views into or from the site that need to be carefully considered?

features, such as streams that need to be carefully designed into the development?

6b Are there any existing trees, hedgerows or other

6c Should the development keep any existing building(s) on the site? If so, how could they be used?

We recommend

Being a considerate neighbour. Have regard to the height, layout, building line and form of existing development at the boundaries of the development site. Frame views of existing landmarks and create new ones by exploiting features such as existing mature trees to create memorable spaces. Orientate homes so that as many residents as possible can see these features from within their homes¹⁰. Carefully consider views into the development and how best these can be designed.

Assessing the potential of any older buildings or structures for conversion. Retained buildings can become instant focal points within a development. Where possible, avoid transporting building waste and spoil off site by exploring opportunities to recycling building materials within the development¹¹.

Working with contours of the land rather than against them, exploring how built form and detailed housing design can creatively respond to the topographical character; thinking carefully about the roofscape. Explore how a holistic approach can be taken to the design of sustainable urban drainage by exploiting the topography and geology¹².

Exploring opportunities to protect, enhance and create wildlife habitats. Be creative in landscape design by creating wildflower meadows rather than closely mown grassland and, where provided, creating rich habitats within balancing lagoons, rainwater gardens, rills and swales.

Considering the potential to benefit from solar gain through building orientation and design where this can be achieved without compromising good urban design or creating issues associated with over heating¹³. Finally have regard to any local micro-climate and its impact.

We recommend that you avoid

Leaving an assessment of whether there are any views into and from the site that merit a design response until late in the design process.

Transporting uncontaminated spoil away from the site that could be used for landscaping or adding level changes where appropriate.

Not carefully considering opportunities for rainwater attenuation both on plot and off

Not carefully thinking about what balancing lagoons will look like and how people could enjoy them as attractive features within an open space network. Careful thought in the design process can eliminate the need for fenced off lagoons that are both unsightly and unwelcoming.



Existing mature trees on this site in Exeter add character and quality

7 Creating well defined streets and spaces

Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well?

7a Are buildings and landscaping schemes used to create enclosed streets and spaces?

7c Do all fronts of buildings, including front doors and habitable rooms, face the street?

7b Do buildings turn corners well?

We recommend

Creating streets that are principally defined by the position of buildings rather than the route of the carriageway.

Designing building that turn corners well, so that both elevations seen from the street have windows to them, rather than offering blank walls to the street¹⁴. Consider using windows that wrap around corners to maximise surveillance and bring generous amounts of natural light into people's homes.

Using a pattern of road types to create a hierarchy of streets and consider their enclosure, keeping to the well proportioned height to width ratios relative to the type of street¹⁵.

	Minimum	Maximum
Minor streets, e.g mews	1: 1.15	1:1
Typical streets	1:3	1:1.5
Squares	1:6	1:4

Source: Manual for Streets (2007) p.54

Respecting basic urban design principles when designing layouts. For example, forming strong perimeter blocks¹⁶.

Orientating front doors to face the street rather than being tucked around the back or sides of buildings.

We recommend that you avoid

Streets that lack successful spatial enclosure by exceeding recommended height to width ratios.

Over reliance on in front of plot parking that tends to create over wide streets dominated by parked cars and driveways unless there is sufficient space to use strong and extensive landscaping to compensate the lack of built form enclosure.

Homes that back on to the street or offer a blank elevation to the street.

Locating garages and/or driveways (or service areas and substations) on street corners or other prominent locations, such as the 'end point' of a view up or down a street.



Think carefully about what you will see at the end of the street

8 Easy to find your way around

Is the development designed to make it easy to find your way around?

8a Will the development be easy to find your way around? If not, what could be done to make it easier to find your way around?

8b Are there any obvious landmarks?

8c Are the routes between places clear and direct?

We recommend

Making it easy for people to create a mental map of the place by incorporating features that people will notice and remember. Create a network of well defined streets and spaces with clear routes, local landmarks and marker features. For larger developments it may be necessary to create distinct character areas. Marker features, such as corner buildings¹⁷ and public spaces combined with smaller scale details such as colour, variety and materials will further enhance legibility*.

Providing views through to existing or new landmarks and local destinations, such as parks, woodlands or tall structures help people understand where they are in relation to other places and find their way around.

Making it easy for all people to get around including those with visual or mobility impairments.

Identifying and considering important viewpoints within a development, such as views towards the end of a street. Anticipate other, more subtle viewpoints, for example a turn or curve in the street and how best these can be best addressed.

Creating a logical hierarchy of streets. A tree lined avenue through a development can be an easy and effective way to help people find their way around.

We recommend that you avoid

Creating a concept plan for a scheme that does not include careful consideration as to how people will create a mental map of the place.

Layouts that separate homes and facilities from the car, unless the scheme incorporates secure underground car parking.

Creating overly long cul-de-sac developments, rather than a connected network of streets and spaces.

Blocking views to landmarks or notable landscape features.

Terminating views down streets with garages, the rear or side of buildings, parking spaces, boundary fences or walls.



Marker buildings and spaces can help people create a 'mental map' of a place
(Manor Kingsway, Derby)

***Legible features include:** distinct character areas (for larger developments), framing views of existing or proposed new landmarks (and/or landscape features) both on- and off- the development site, a well-defined street hierarchy (for example, tree lined avenues can help establish the character of a principle street within a hierarchy) and creating new marker buildings and spaces.

9 Streets for all

Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?

9a Are streets pedestrian friendly and are they designed to encourage cars to drive slower and more carefully?

9b Are streets designed in a way that they can be used as social spaces, such as places for children to play safely or for neighbours to converse?

We recommend

Creating streets for people where vehicle speeds are designed not to exceed 20 mph¹⁸. Work with the Highways Authority to create developments where buildings and detailed street design is used to tame vehicle speeds. Sharp or blind corners force drivers to slow when driving around them while buildings that are closer together also make drivers proceed more cautiously¹⁹. 20mph zones are becoming increasingly popular with local communities and are a cost effective way of changing driver behaviour in residential areas.

Thinking about how streets can be designed as social and play spaces, where the pedestrians and cyclists come first, rather than simply as routes for cars and vehicles to pass through²⁰.

Using the best quality hard landscaping scheme that is viable without cluttering the streets and public spaces.

Designing homes that offer good natural surveillance opportunities; carefully considering the impact of internal arrangement on the safety and vitality of the street²¹. Consider maximising the amount of glazing to ground floor, street facing rooms to enhance surveillance opportunities creating a stronger relationship between the home and the street²².

Creating homes that offer something to the street²³, thinking carefully about detail, craftsmanship and build quality. Afford particular attention to the space between the pavement and front doors²⁴. A thoughtful and well designed entrance area and front door scheme will enhance the kerb appeal of homes whilst also contributing towards creating a visually interesting street. Carefully

consider changes in level, the interface between different materials, quality finishing and the discreet placement of utility boxes.

We recommend that you avoid

20mph speed limits enforced with excessive signage or expensive compliance systems or features.

Designing a scheme that allows drivers to cross pedestrian footpaths at speed to access their driveways. Consider how hard and soft landscaping can be used to make drivers approach their street and home more cautiously and responsibly.

Minimise steps and level changes to make them as easy as possible for pushchairs and wheelchairs.

A pavement that has lots of variation in levels and dropped kerbs to enable cars to cross it can encourage unofficial parking up on the kerb and may make movement less easy for those pushing a pushchair, in a wheelchair or walking with a stick or walking frame.



At Fairfield Park in Bedfordshire, vertical calming and 'pinch points' remind drivers they are in a 20mph zone

10 car parking

Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?

10a Is there enough parking for residents and visitors?

10b Is parking positioned close to people's homes?

10c Are any parking courtyards small in size (generally no more than five properties should use a parking

courtyard) and are they well overlooked by neighbouring properties?

10d Are garages well positioned so that they do not dominate the street scene?

We recommend

Anticipating car parking demand taking into account the location, availability and frequency of public transport together with local car ownership trends. Provide sufficient parking space for visitors.

Designing streets to accommodate on street parking but allow for plenty of trees and planting to balance the visual impact of parked cars and reinforce the spatial enclosure of the street. On street parking has the potential to be both space efficient and can also help to create a vibrant street, where neighbours have more opportunity to see and meet other people.



Parking near front doors and softened with landscaping help this parking in Oxford integrate well with the street

Prevent anti-social parking. Very regular and formal parking treatments have the potential to reduce anti-social parking. People are less prone to parking in places where they should not be parking, where street design clearly defines other uses, such as pavements or landscape features.

Making sure people can see their car from their home or can park it somewhere they know it will be safe. Where possible avoid rear parking courts²⁵.

Using a range of parking solutions appropriate to the context and the types of housing proposed. Where parking is positioned to the front of the property, ensure that at least an equal amount of the frontage is allocated to an enclosed, landscaped front garden as it is for parking to reduce vehicle domination. Where rows of narrow terraces are proposed, consider positioning parking within the street scene, for example a central reservation of herringbone parking²⁶. For higher density schemes, underground parking with a landscaped deck above can work well.

We recommend that you avoid

Relying on a single parking treatment. A combination of car parking treatments nearly always creates more capacity, visual interest and a more successful place.

Large rear parking courts. When parking courts are less private, they offer greater opportunity for thieves, vandals and those who should not be parking there.

Parking that is not well overlooked.

Using white lining to mark out and number spaces. These are not only costly, but unsightly. It can be cheaper and more aesthetically pleasing to use small metal plates to number spaces, and a few well placed block markers to define spaces.

Not providing a clear and direct route between front doors and on-street parking or not balancing the amount of parking in front of plots with soft relief.

11 Public & private spaces

Will public and private spaces be clearly defined and designed to have appropriate access and be able to be well managed and safe in use?

11a What types of open space should be provided within this development?

developer contribute towards an existing facility in the area that could be made better?

11b Is there a need for play facilities for children and teenagers? If so, is this the right place or should the

11c How will they be looked after?

We recommend

Clearly defining private and public spaces with clear vertical markers, such as railings, walling or robust planting. Where there is a modest building set back (less than 1m), a simple change in surface materials may suffice. Select species that will form a strong and effective boundary, such as hedge forming shrubs rather than low growing specimens or exotic or ornamental plants. Ensure sufficient budget provision is allocated to ensure a high quality boundary scheme is delivered.

Creating spaces that are well overlooked by neighbouring properties. Check that there is plenty of opportunity for residents to see streets and spaces from within their homes. Provide opportunities for direct and oblique views up and down the street, considering the use of bay, oriel and corner windows where appropriate. Designing balconies can further increase opportunities for natural surveillance.

Thinking about what types of spaces are created and where they should be located. Consider how spaces can be designed to be multi-functional, serving as wide an age group as possible and how they could contribute towards enhancing biodiversity²⁷. Think about where people might want to walk and what routes they might want to take and plan paths accordingly providing lighting if required. Consider the sun path and shadowing throughout the day and which areas will be in light rather than shade. Areas more likely to benefit from sunshine are often the most popular places for people to gather.

Exploring whether local communities would wish to see new facilities created or existing ones upgraded. Think how play can be approached in a holistic manner, for example by distributing play equipment or playable spaces and features across an entire open space.

Providing a management and maintenance plan to include a sustainable way to fund public or shared communal open spaces.

We recommend that you avoid

Informal or left over grassed areas that offer no public or private use or value and do little or nothing to support biodiversity.

Avoid creating small fenced play areas set within a larger area of open space where the main expense is the cost of fencing.

Landscaping that is cheap, of poor quality, poorly located and inappropriate for its location. Low growing shrubs rarely survive well in places where people are likely to accidentally walk over them (such as besides parking bays).



Sometimes recreation space can double up as a formal landscaping feature

(Gun Wharf, Plymouth)

12 External storage and amenity space

Is there adequate external storage space for bins and recycling, as well as vehicles and cycles?

12a Is storage for bins and recycling items fully integrated, so that these items are less likely to be left on the street?

12b Is access to cycle and other vehicle storage convenient and secure?

We recommend

Providing convenient, dedicated bin and recycling storage where bins and crates can be stored out of sight. Check with the local authority to determine exactly what space is required and minimise the distance between storage areas and collection points. Where terraced housing is proposed, consider providing integral stores to the front of the property (such as within an enclosed section of a recessed porch) or by providing secure ginnels between properties that provide direct access to the rear of properties²⁸.

Designing garages and parking spaces that are large enough to fit a modern family sized car and allow the driver to get out of the car easily. Where local authorities have requirements for garage sizes, parking spaces and circulation space design these into your scheme from the outset. If garages do not meet local requirements, do not count these as a parking space.

Considering whether garages should be counted as a parking space. If garages are to be counted as a parking space, ensure that sufficient alternative storage space is provided for items commonly stored in garages. Consider extending the length of the garage to accommodate storage needs or allowing occupants to use the roof space for extra storage²⁹.

Anticipating the realistic external storage requirements of individual households. Residents will usually need a secure place to store cycles and garden equipment. A storage room could be designed to the rear of the property (either attached or detached from the home), reviving the idea of a traditional outhouse. More creative solutions may be needed to satisfy the cycle storage requirements of higher density apartment accommodation.

Thinking carefully about the size and shape of outside amenity space. It is a good idea to ensure that rear gardens are at least equal to the ground floor footprint of the dwelling. Triangular shaped gardens rarely offer a practical, usable space³⁰. Allow residents the opportunity to access their garden without having to walk through their home.



Poorly integrated bin storage erode the quality of this street in Oxford

We recommend that you avoid

Bin and recycling stores that detract from the quality of the street scene.

Locating bin and recycling stores in places that are inconvenient for residents, or they might find it easier to leave their bin and containers on the street.

Designing garages that are impractical or uncomfortable to use.

Cycle storage that is not secure or is difficult to access.

Using Building For Life 12 in more urban locations

Supplementary design prompts were introduced in November 2014 in response to feedback from users about the need to better address design issues in more urban locations.

Building for Life 12's core focus is on street and urban issues in schemes of between about 25-50 homes to the hectare, such as those typical of more suburban or rural locations. This supplement deals with issues found where apartment blocks of three or more storeys create new developments with few, if any, new streets and where key design issues are how blocks respond to their locality, existing streets and movement.

Six of the twelve questions now have an alternative prompt to suit urban situations. Whilst the ethos of each question remains the same the emphasis and considerations reflect better the challenges and considerations associated with more urban locations and higher density developments. We recommend that design teams agree with the local authority which version of the questions are most appropriate to any proposed development.



1 Connections and scale

Does the scheme respond to the scale of its surroundings, respect existing view corridors (or create new ones), and reinforce existing connections and make new ones where feasible?

Design rationale:

To emphasise visual connectivity whilst ensuring that where possible, the opportunity is taken to make physical connects that are going to be well-used and of benefit to residents and the wider community.

8 Easy to find your way in and around

Is the scheme designed to make it easy to understand the

links between where people live and how you access the building, as well as how you move through it?

Design rationale:

To emphasise the importance of creating a well defined entrance(s) to a development. Is it easy to find the front door?

9 Active Streets

Does the development engage with the street so passers-by will understand the movement between the building and the street, and is there an obvious visual link between inside and outside?

Design rationale:

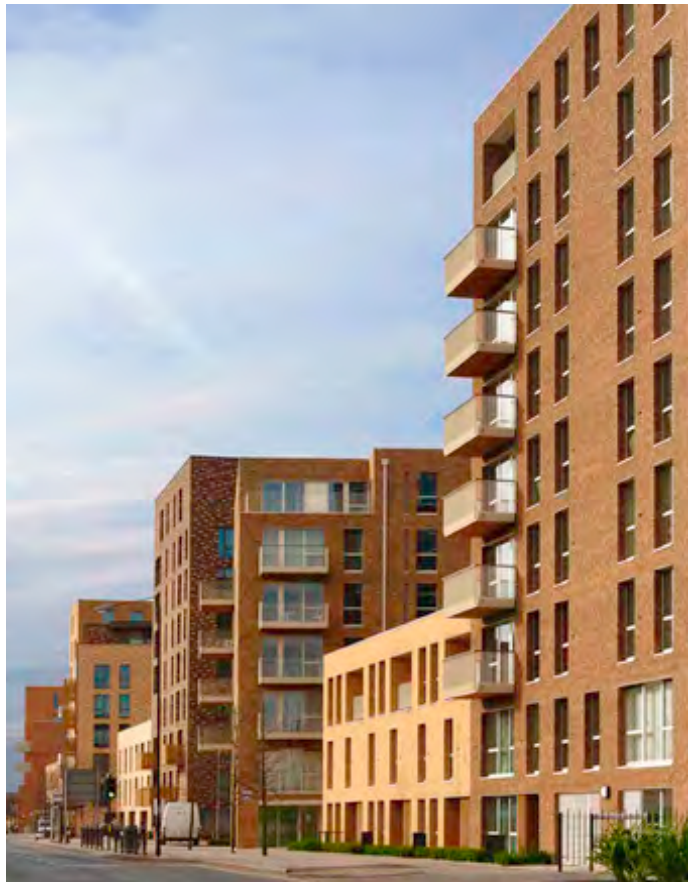
To emphasise the importance of creating active edges to a development at street level, carefully consider how the building relates to the street, how vehicle and servicing is designed and to avoid dead elevations.

10 Cycle and car parking

Will the development be likely to support and encourage cycling by providing cycle storage which people can use with confidence? Where parking is provided, is this easy to use? Are accesses to car parking designed not to impact on those not in cars? Are entrances to car parks over-engineered, visually obtrusive or obstructive to pedestrians and cyclists?

Design rationale:

To emphasise the modal emphasis on bikes in more urban development where people are more likely to live close enough to work and leisure to cycle. Seeks to also promote well-designed entrances to parking areas whether at grade or underground.



Design rationale:

To emphasise the importance of designing such spaces to be functional, attractive and well used.

12 Private amenity and storage

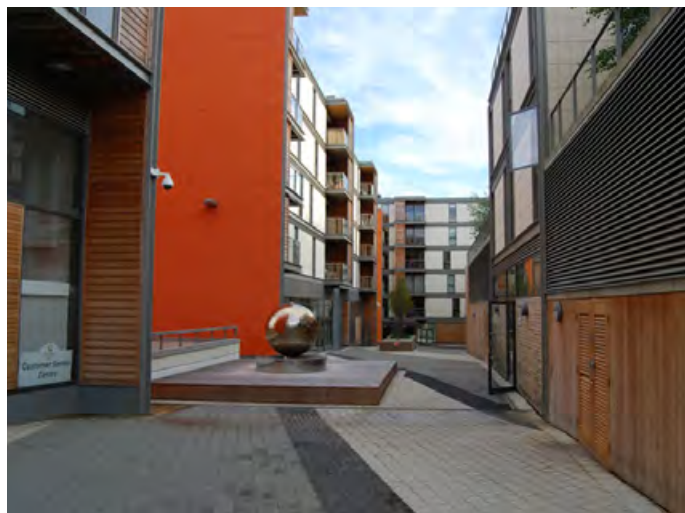
Are outdoor spaces, such as terraces and balconies, large enough for two or more people to sit? Is there opportunity for personalisation of these spaces? Is waste storage well integrated into the design of the development so residents and service vehicle access it easily whilst not having an adverse impact on amenity for residents.

Design rationale:

To focus on practical balcony sizes and well designed communal waste facilities that are well resolved in relation to building entrances and screened from publicly accessible routes.

11 Shared spaces

Is the purpose and use of shared space clear and it is designed to be safe and easily managed? Where semi-private or private spaces are created, are these clearly demarcated from the public realm?



Notes

1 Department for Communities and Local Government (2011) 'Laying the Foundations: A Housing Strategy for England', HMSO

Further supported by the National Planning Policy Framework (2012) and the Localism Act and Planning Practice Guidance.

2 To find out more about obtaining Built for Life quality mark please visit www.builtforlifehomes.org. Building for Life training and support (including facilitation of community workshops using BfL12) is available locally through the Design Network www.designnetwork.org.uk

3 Visit www.builtforlifehomes.org for further information.

4 For example, local concerns relating to crime and anti-social behaviour or cost prohibitive ransom strips may prevent the best connections being provided between a new development and its surroundings.

5 For strategic developments, such as sustainable urban extensions.

6 On larger developments.

7 A simple test is to ask how the architecture whether traditional or modern acknowledges and enhances its context. But there is no benefit in recycling tradition if treatments are not locally authentic.

8 However, this does not require pastiche. The aim is to exploit qualities in the character of local stock and link to them, not replicate them, but at the same time recognising that in some circumstances there is a need for a step change in approach to overall design ethos and approach.

9 Such as landscaping, tree lined streets, parks, greens, crescents, circuses, squares and a clear hierarchy of streets such as principal avenues, lanes, mews and courtyards, as well as colour, landscaping and detailing.

10 Consider using windows where appropriate to frame views from within the home.

11 Weathered materials can help add instant character whether within retained structures or reused as to create boundary walls, plinths or surface treatments.

12 For example by using permeable paving and creating a network of rills, swales, rain gardens and green roofs where suitable.

13 East-facing bedrooms are very popular for morning sun, while west-facing or south-facing patio gardens and living rooms boost their appeal in spring and autumn. In higher density schemes endeavour to have at least one principal room being able to receive sunlight through some of the day.

14 These windows need to serve habitable rooms where occupants tend to spend a lot of their day rather than bathrooms, hallways, stairwells and cloakrooms.

15 These may need to be varied within medium to higher density schemes.

16 Where buildings create the outside edge of the block and interlocked back gardens and/or shared amenity spaces create the middle.

17 Perhaps incorporating commercial premises where viable or designing flexible units that could be easily remodelled to accommodate commercial premises in the future.

18 By restricting forward visibility, using vertical features such as raised plateaus and/or designating Home Zones. Carefully consider the impact

of features such as over engineered corner radii on vehicle speeds and pedestrian safety and comfort. See www.20splentyforus.org.uk.

20 Shared surfaces may be appropriate in low traffic areas though carefully consider how shared environments can still be navigable by those with visual impairments.

21 First floor living rooms can be very effective for this purpose, even more so with bay or corner windows and balconies. The key attribute is that windows that face the street should be from habitable rooms where occupants are likely to spend a lot of their day.

22 Whilst also maximising the amount of natural light penetrating internal spaces.

23 Such as colour, detail, craftsmanship or other form of artistic expression and creativity.

24 Or shared access for apartment accommodation.

25 If rear parking courtyards are used, keep them small, so that residents know who else should be using it. Make sure at least one property is located at the entrance to the parking courtyard to provide a sense of ownership and security. Avoid multiple access points. Allow sufficient budget for boundary walls, surface treatments, soft landscaping and lighting to avoid creating an air of neglect and isolation. Contact the local Police Architectural Liaison Officer to determine whether local crime trends justify securing the courtyard with electric gates.

26 To avoid a car dominated environment, break up parking with a tree or other landscaping every four bays or so but ensure that the landscaping still allows space for people to get into and out of their cars, without having to step onto landscaped areas.

27 Discussions with local police officers and local community groups can be a useful source of information on what works well and what does not in a particular area and can help guard against creating potential sources of conflict.

28 If storage is provided within the rear garden, think about how bins and containers can be discreetly stored out of sight.

29 Non solid garage doors can dissuade residents from using these spaces as storage areas, but this will only be effective where sufficient alternative storage space is provided and where Permitted Development Rights are removed and enforced.

30 Where balconies are provided, design these generously so that they are large enough for a small table and at least two chairs.

References:

Department for Communities and Local Government (2012)

National Planning Policy Framework, HMSO

Department for Communities and Local Government and

Department of Transport (2007) Manual for Streets, HMSO

The Institution of Highways and Transportation (2000) Guidelines for Providing for Journeys on Foot, London. www.ciht.org.uk

By using Building for Life 12 as a tool throughout the design process, you can demonstrate compliance with the National Planning Policy Framework and Planning Practice Guidance

Building For Life 12 Question	Links with the National Planning Policy Framework (2012)	Links with Planning Practice Policy Guidance (2014)*
Integrating into the neighbourhood		
1. Connections	9, 41, 61, 75	006, 008, 012, 015, 022
2. Facilities and services	38, 58, 70, 73	006, 014, 015, 017
3. Public transport	9, 17, 35	012, 014, 022
4. Meeting local housing requirements	9, 47, 50	014, 015, 017
Creating a place		
5. Character	17, 56, 58, 60, 64	006, 007, 015, 020, 023
6. Working with the site and its context	9, 10, 17, 31, 51, 58, 59, 118	002, 007, 012, 020, 023
7. Creating well defined streets and spaces	58	008, 012, 021, 023
8. Easy to find your way around	58	022
Street and home		
9. Streets for all	35, 58, 69	006, 008, 012, 022, 042
10. Car parking	39, 58	010, 040
11. Public and private space	57, 58, 69	006, 007, 009, 010, 015, 016, 018
12. External storage and amenity	58	040

Generally:

NPPF: 63, 56 – 58, 63, 64

PPG*: 001, 004, 005, 029, 031 – 038

(BfL12 is designed to be used to support consultation and community participation. It can also be used to guide masterplans, design codes, frame pre-application discussions and Design Reviews, structure Design and Access Statements, support local decision making and if necessary justify conditions relating to detailed aspects of design, such as materials).

*paragraph references within 'Design' guidance category.

Credit: Kruczkowski, S

Suggested acceptable walking distances

These suggested acceptable walking distances can help you with questions in the 'Integrating into the neighbourhood'

	Town centres (m)	Commuting / School / Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

Source: The Institution of Highways and Transportation (2000) Guidelines for Providing for Journeys on Foot, London (p.49)

Credit: Birkbeck, D., Collins, P., Kruczkowski, S, and Quinn, B.

Building for Life is the industry standard, endorsed by government for well-designed homes and neighbourhoods. It can help local communities, local authorities and developers work together to create good places to live, work and play.

'Homes that sell for the highest amount and quicker than others have great kerb appeal. Built for Life schemes have this special kerb appeal. The streets and homes are better arranged - they are better designed places and will sell better in the future on the second hand market.'

Mike Fallowell FRICS, Co-founder, Newton Fallowell.

'Built for Life accreditation gives the consumer confidence in the quality of developments and the consideration that has gone into all aspects of the build.'

Nick Boles MP, former Parliamentary Under Secretary of State for Planning.

'This government recognises that what we build is just as important as how many homes we build.'

HM Government (2011), Laying the Foundations: A Housing Strategy for England, HMSO, London.



Appendix X iii



BUILDING FOR LIFE 12



2018 Edition

Building for Life 12 (BfL12) is a design tool designed to help structure discussions about proposed new residential development between home builders, Urban Development Corporations, local authorities, communities and other stakeholders.

BfL12 is England's leading process for creating well-designed homes and neighbourhoods – used by an increasing number of home builders, local authorities and community groups.

Endorsed by the government and cited in the proposed modifications to the National Planning Policy Framework, Building for Life 12 is managed by three partners - Design Council Cabi, Design for Homes and the Home Builders Federation.

BfL12 was created in 2012 to support the Government's commitment to:

- **Building more homes¹**
- **Building better designed homes and neighbourhoods**
- **Creating a more creative and collaborative planning system**
- **Involving local communities in shaping development proposals²**

This guide will help you to understand what BfL12 is and how to use it. BfL12 is free to use – home builders and local authorities across England are encouraged to use it to structure pre-application discussions. Local authorities are also encouraged to refer to BfL12 in their Local Plans, and do not need permission from the Building for Life Partners to embed BfL12 into local policies. Local community groups are also welcome to use BfL12, with many already referring to BfL12 in Neighbourhood Plans.

BfL's 12 questions are designed to help planning authorities, Urban Development Corporations and home builders create a structured and focused design dialogue. BfL12 can also help identify what issues really matter to local communities and how development proposals can respond positively to these.

Based on a traffic light system, the aim is simple – to achieve as many 'greens' as possible (we recommend at least nine), challenge 'ambers' and avoid 'reds'. The more 'greens' a development secures, the better it will be. By using BfL12, better places can be created and common pitfalls associated with many new developments avoided.

Part of the Building for Life initiative is about raising consumer awareness of the benefits of good design and helping them to easily identify which developments have been sensitively designed and considered. The Built for Life™ accreditation scheme³ offers home builders the opportunity to secure a quality mark to give consumers added confidence that their development is a good place to buy a home. Built for Life™ Quality Marks are available once a development has secured planning approval. To obtain a quality mark the process is simple: secure at least nine 'green' indicators⁴.

In April 2014 we launched **builtforlifelifehomes.org**. Here you can find a fascinating range of Built for Life™ schemes from across the country, from north to south, east to west. These reflect a range of market areas demonstrating the Building for Life principles can be achieved even in challenging market conditions. At the time of this publication (May 2016) our website featured 22,000 homes across 52 developments nationwide⁵ – a strong indicator of the impact of the Building for Life initiative and those in the industry committed to building more and better homes.



Cover image: Oakwell Grange, Whetstone. Image reproduced courtesy and with copyright consent granted by Barratt Developments Plc.



Why and how to use Building for Life 12



Portobello Square, RB Kensington & Chelsea, Catalyst

An increasing number of home builders are using BfL12 as a way of working to help speed up the planning process and improve the quality of the places they build. Ten years in the making, piloted on live planning applications and written to fit alongside both the National Planning Policy Framework and National Planning Practice Guidance, BfL12 has become the home building industry's preferred way of creating well-designed new homes and communities.

BfL12 is designed to be used as a design dialogue tool, a basis for discussion with 12 simple, easy to understand questions around which ideas can be shared and explored. BfL is ideal for facilitating local community participation in the place making process. It is also ideal for Neighbourhood Plans and Local Plans. BfL12 can be used to support planning applications and planning applications - but only where it has been used as a basis for discussion throughout the pre-application process.

Since 2012, BfL12 has been widely adopted across the home building industry, by Urban Development Corporations and an ever-increasing amount of local authorities. Its success has secured support from government as a way of not only building more homes, but better places to live.

A key benefit of BfL12 is that it can help local planning authorities consider the quality of both proposed and completed developments. The jargon free language of BfL12 will help planning officers to better communicate design considerations to Elected Members. BfL12 is also useful for creating site-specific briefs, structuring Design Codes and local design policies.



Horsted Park, Chatham, Countryside Properties





The Strike, Helmsley, Taylor Wimpey

BfL12 is a way of working that helps guide development proposals towards better design. Developments that are based on these principles will help developers demonstrate to local planning authorities that their proposals are well considered and responsive to considerations such as local characteristics specific to a given site.

Where BfL12 is used in this way and particularly where both the developer and local planning authority choose to use it as a basis for discussion, the planning process is often faster with a greater focus on design refinement rather than design fundamentals during the pre-application stage of a development.

BfL12 is therefore a mechanism through which local planning authorities can promote good design practice within their administrative boundaries and against which developers can set benchmarks for their businesses. BfL12 is the only tool that both the house building industry, government and an increasing amount of local planning authorities actively support. As such, BfL12 offers a routemap to consensus on what to focus on when discussing, designing and considering proposed new developments.

By using Building for Life we have been able to speed up the delivery of new homes whilst also raising the quality of the places being created. It has enabled us to guarantee good quality new housing, which wasn't the case ten years ago. If you're not convinced, come and visit us!

Councillor Richard Blunt, Leader of the Council, North West Leicestershire District Council

Today BfL12 is rapidly growing in both its popularity and its use:

- BfL12 is regularly referenced by government, Ministers and Members of Parliament as a constructive way of supporting house building rates without neglecting good design.
- Management consultancies evaluate whether house builders produce sustainable development using the BfL12 principles. For example, NextGeneration ranks major house builders by their commitment to it. (Source: NextGeneration).
- Building for Life 12 Wales is endorsed by Welsh Government and the Design Commission for Wales (DCFW). BfL12 is available in Welsh and English and complements the requirements of Planning Policy Wales and Technical Advice Note 12: Design. Training and support is available to Welsh authorities and communities from DCFW.



By using BfL12 as a dialogue tool throughout the design process, compliance with the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) can be demonstrated. BfL12 is aligned to the NPPF and NPPG. By following BfL12’s questions and the guidance provided within this booklet, new developments can be designed to accord with design policies set out within the NPPF.

The table below illustrates the relationship between the twelve questions, the NPPF and NPPG. BfL12 is therefore an easy way to ensure that proposed developments meet national policy requirements – a more streamlined way of working than working through 24 individual NPPF policy references. Planning Inspectors are increasingly referring to BfL12 when considering the design merits (or deficiencies) of planning applications. For developments within Wales please refer to the Welsh edition of BfL12 that provides cross references between the 12 questions and Welsh policies. Further details can be found at <http://dcfw.org/building-for-life-12-wales/>

Building For Life 12 Question	Links with the National Planning Policy Framework (2012)	Links with Planning Practice Policy Guidance (2014)*
Integrating into the neighbourhood		
1. Connections	9, 41, 61, 75	006, 008, 012, 015, 022
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3. Public transport	9, 17, 35	012, 014, 022
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Creating a place		
5. Character	17, 56, 58, 60, 64	006, 007, 015, 020, 023
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10. Car parking	39, 58	010, 040
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Generally:
NPPF: 63, 56 – 58, 63, 64
PPG*: 001, 004, 005, 029, 031 – 038

(BfL12 is designed to be used to support consultation and community participation. It can also be used to guide masterplans, design codes, frame pre-application discussions and Design Reviews, structure Design and Access Statements, support local decision making and if necessary justify conditions relating to detailed aspects of design, such as materials).

*paragraph references within ‘Design’ guidance category.

Note: this table will be updated in Autumn 2018 when the government concludes it consultation process on proposed modifications to the NPPF.

Building for Life 12 is about creating better places by promoting basic principles of urban design. Part of Building for Life is about recognising good practice and enabling developers that perform well against the 12 questions to demonstrate their commitment to good design to prospective home buyers. Any new development that secures at least nine ‘green’ indicators against the twelve questions are eligible to apply for a Built for Life™ quality mark.

Why nine out of twelve?

At times there are circumstances beyond the control of a developer that will mean it is not possible to secure a full complement of twelve ‘green’ indicators. These will normally only be justified in the first section of Building for Life 12, i.e. ‘Integrating into the neighbourhood’ (please see the ‘Assessing what is appropriate’ pages for more information). Developments that secure all twelve ‘green’ indicators are eligible to apply for a Built for Life™ ‘Outstanding’ quality mark. The process of applying for a quality mark is simple. To be considered for a quality mark a development must have secured planning permission.

The next stage is to upload details of the development onto www.builtforlifelifehomes.org. The scheme will then be subject to a ‘light touch’ review. If the development will have a strong likelihood of achieving a quality mark, the applicant will be invited to attend a Built for Life™ panel presentation where the scheme will be considered in more depth.



Trumpington Meadows, Cambridge, Barratt Homes





Oxford Waterside, Jericho, Berkeley Group

BfL12's questions were created to help designers and non-designers to work better together and create better places. BfL12 is primarily a discussion tool – a framework around which issues and ideas can be explored. BfL12 therefore works best if used at the start of the planning process. BfL12 is not designed to be used in isolation as an assessment tool once a planning application has been submitted. If BfL12 has not been used throughout the planning process we do not support its use as a justification for the refusal of a planning application. Likewise, if BfL12 has not been used by a developer at the inception stages of a proposed development and throughout the pre-application process, it should not be used to support an application.

BfL12 uses a simple traffic light system whereby a 'red' indicator suggests that one or more aspects of the design need to be considered; 'ambers' indicate a need for further discussion or refinement⁴. 'Green' indicators suggest one or more aspects of a scheme have been well considered and resolved. By using the traffic light system early in the process a meaningful discussion can take place between stakeholders. Early on in the process, all those involved can agree what needs to be done to achieve a 'green' indicator on each particular question.

By having these discussions early on in the process, it may be possible to identify the needs and aspirations of a local community – what their concerns are and how these might be resolved through either design and/or Section 106 contributions, for example to local healthcare and education provision.

By using BfL12 early in the design process, it is possible to identify aspects of a proposed development that are of concern - or those that need some attention, as well as those that are well resolved. By using BfL12 in this way, it is easy to communicate what needs to be done to achieve compliance with the design policies contained within the National Planning Policy Framework. Developments that achieve 9 'greens' are eligible for 'Built for Life™' accreditation. Built for Life™ accreditation is a quality mark available after planning approval but before build completion - offering developers the opportunity to promote the quality of their developments during sales and marketing activity. Accreditation also gives those looking for a new home the opportunity to find the best designed places to live within their search area and budget – and those that will potentially retain or increase their value over time.

The ambition of the BfL initiative is to encourage hundreds of developments across the country to be built using the BfL12 principles as standard. An increasing number of house builders are using Built for Life™ accreditation to build local reputations for quality, reinforce their brand image and also protect individual plots from discounting or the risk of becoming 'stock plots'. Schemes seeking the quality mark are partly assessed online and partly face to face by local panels comprised of independent assessors. You can expect a panel to request a short but generally informal presentation of your proposals and a discussion taking place around each question in turn.

Panel members will review scheme details before the review presentation and therefore if they are satisfied with some aspects of a scheme they may choose to only focus on aspects of the scheme where they have questions or concerns. Panels will reach a decision on the day, and those presenting will be able to observe their discussions. This will mean that, if for instance, you are unsuccessful in securing accreditation you know the reasons why. We believe that this is an essential part of the review process, both for reasons of transparency but also to help those presenting to panels better understand BfL12. Local authorities that make a commitment to using BfL12 can also achieve recognition. From 2017 local authorities that have adopted BfL12 as a way of working will be given the opportunity to secure recognition.



Who decides what is green, amber or red?



Ely Court, South Kilburn, Catalyst and London Borough of Brent

Previous versions of Building for Life (until 2010) relied on Accredited Assessors to provide definitive assessments of proposed developments, however this process has now changed. BfL12 places an emphasis on design focused discussions. At the start of the planning process, all those involved including local communities and other stakeholders are encouraged to contribute towards a discussion about what a place should become and what it needs to do. Particular stakeholders might have specific concerns or interests that can be captured in one or more of BfL12's questions.

In previous versions of Building for Life it was not uncommon for a developer to prepare an application, engage in pre-application discussions with the local planning authority – within which no reference would be made to Building for Life. Yet once the application was formally submitted, the planning authority consulted an Accredited Assessor. Inevitably, where a scheme had not been designed with the Building for Life principles in mind they often failed to achieve them. This process often caused frustration and delays for both developers and local planning authorities.

The emphasis has therefore shifted away from formal assessments to using BfL12 primarily as a discussion tool. This way, those involved in an application can discuss each of the 12 questions in turn and agree what needs to be done to achieve 'greens' and in some cases, under what circumstances one or more 'ambers' may be justified.

Through this process, it is possible to identify areas of potential conflict or disagreement early. For instance, a draft set of proposals might be considered by the developer to achieve a 'green' against a particular question. However the local planning authority might consider the proposals to merit an 'amber' instead. At this point, a discussion should take place. The developer should demonstrate why they consider a 'green' to be merited, likewise the local planning authority should offer their perspective.

Where this approach is adopted, it is not uncommon for a consensus to be reached and in turn a solution found. If a consensus or solution cannot be found, we recommend using a local Design Review Panel. Many local panels now offer BfL12 based workshops and review services. The emphasis of BfL12 is about getting people to work better together and create better places.

If a scheme is considered a potential candidate for Built for Life™ accreditation there will be independent scrutiny of developments once an application has secured planning approval. Through this independent review process, home buyers can have the confidence that Built for Life™ accreditation is the sign of a good place to live.



Cottam Meadow, Preston, Barratt Homes



Each question is followed by a series of additional questions that are intended as prompts to stimulate discussions and ensure that all aspects of a scheme have been well considered. We've also provided five recommendations for how you might respond with the aim of offering a range of responses.

Recommendations are designed to stimulate discussion with local communities, the project team, the local authority and other stakeholders to help you find the right solution locally. No one is required to meet all recommendations, instead they are prompts to guide you to better design solutions.

We've travelled the country visiting hundreds of residential developments. During these visits, we found the same problems again and again. So, our 'avoid' tips are there to warn against these pitfalls.

Finally, we've added endnotes providing further detail, clarity and where appropriate, references that you may find useful.

Integrating into the neighbourhood

1 Connections

Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones, while also respecting existing buildings and land uses around the development site?

2 Facilities and services

Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?

3 Public transport

Does the scheme have good access to public transport to help reduce car dependency?

4 Meeting local housing requirements

Does the development have a mix of housing types and tenures that suit local requirements?

Creating a place

5 Character

Does the scheme create a place with a locally inspired or otherwise distinctive character?

6 Working with the site and its context

Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and microclimates?

7 Creating well defined streets and spaces

Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well?

8 Easy to find your way around

Is the scheme designed to make it easy to find your way around?

Street & home

9 Streets for all

Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?

10 Car parking

Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?

11 Public and private spaces

Will public and private spaces be clearly defined and designed to be attractive, well managed and safe?

12 External storage and amenity space

Is there adequate external storage space for bins and recycling as well as vehicles and cycles?



Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones, while also respecting existing buildings and land uses around the development site?

- 1a** Where should vehicles come in and out of the development?
- 1b** Should there be pedestrian and cycle only routes into and through the development? If so, where should they go?
- 1c** Where should new streets be placed, could they be used to cross the development site and help create linkages across the scheme and into the existing neighbourhood and surrounding places?
- 1d** How should the new development relate to existing development? What should happen at the edges of the development site?

We recommend

Thinking about where connections can and should be made; and about how best the new development can integrate into the existing neighbourhood rather than creating an inward looking cul-de-sac development.

Remembering that people who live within a new development and people who live nearby may want to walk through the development to get somewhere else, so carefully consider how a development can contribute towards creating a more walkable neighbourhood.

Thinking carefully before blocking or redirecting existing routes, particularly where these are well used. Carefully consider connectivity around the edges of the development, bearing in mind that a network of private drives can frustrate and block pedestrian and cycle movement.

Creating a network of connections that are attractive, well lit, direct, easy to navigate, well overlooked and safe. Bear in mind that a pedestrian or cycle way through an open space may be attractive as a route during daylight hours, but less so early in the evening during winter.

Ensuring that all street, pedestrian and cycle only routes pass in front of people's homes, rather than to the back of them.

We recommend that you avoid

Not considering how the layout of a development could be designed to improve connectivity across the wider neighbourhood.

Not considering where future connections might need to be made - or could be provided - in the future.



Simple, direct and overlooked footpaths encourage walking, Church Fields, Boston Spa, Taylor Wimpey



2. Facilities and services

Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?

2a Are there enough facilities and services in the local area to support the development? If not, what is needed?

2c Are these new facilities located in the right place? If not, where should they go?

Where new facilities are proposed:

2b Are these facilities what the area needs?

2d Does the layout encourage walking, cycling or using public transport to reach them?

We recommend

Planning development so that everyday facilities and services are located within a short walk of people's homes. The layout of a development and the quality of connections it provides can make a significant impact on walking distances and people's travel choices.

Providing access to facilities through the provision of safe, convenient and direct paths or cycle routes. Consider whether there are any barriers to pedestrian/cycle access (for example, busy roads with a lack of crossing points) and how these barriers can be removed or lessened.

Locating new facilities (if provided) where the greatest number of existing and new residents can access them easily, recognising that this may be at the edge of a new development or on a through route; but consider whether existing facilities can be enhanced before proposing new ones.

Where new local centres⁶ are provided, design these as vibrant places with smaller shops combined with residential accommodation above (rather than a single storey, single use supermarket building). Work to integrate these facilities into the fabric of the wider development to avoid creating an isolated retail park type environment dominated by car parking and highways infrastructure.

Creating new places within a development where people can meet each other such as public spaces, community buildings, cafes and restaurants. Aim to get these delivered as early as possible. Think carefully about how spaces could be used and design them with flexibility in mind, considering where more active spaces should be located so as to avoid creating potential conflict between users and adjacent residents.

We recommend that you avoid

Locating play areas directly in front of people's homes where they may become a source of tension due to potential for noise and nuisance.

Carefully consider the distance between play equipment and homes in addition to the type of play equipment selected and the target age group.

Creating the potential for future conflict if residential uses and commercial premises are not combined thoughtfully.



This housing for seniors incorporates a wonderful social space, Pegasus Court, Taunton, Pegasus Life



Does the scheme have good access to public transport to help reduce car dependency?

- 3a What can the development do to encourage more people (both existing and new residents) to use public transport more often?
- 3b Where should new public transport stops be located?

We recommend

Maximising the number of homes on sites that are close to good, high frequency public transport routes, but ensure that this does not compromise the wider design qualities of the scheme and its relationship with its surroundings. 'Hail and ride' schemes agreed with public transport providers can help reduce the distance people need to walk between their home and public transport.

Carefully considering the layout and orientation of routes to provide as many people as possible with the quickest, safest, attractive and most convenient possible routes between homes and public transport.

Considering how the layout of the development can maximise the number of homes within a short walk from their nearest bus, tram or train stop where new public transport routes are planned to pass through the development. Locate public transport stops in well used places, ensuring that they are accessible for all, well overlooked and lit.

Considering how the development can contribute towards encouraging more sustainable travel choices, for example by establishing a residents car club, providing electric car charging points, creating live/work units or homes that include space for a home office.

Exploring opportunities to reduce car miles⁵ through supporting new or existing park and ride schemes or supporting the concept of transit orientated developments (where higher density and/or mixed use development is centred on train or tram stations).

We recommend that you avoid

Thinking about development sites in isolation from their surroundings. For example, bus only routes (or bus plugs) can be used to connect a new development to an existing development and create a more viable bus service without creating a 'rat run' for cars.



Development with easy access to Docklands Light Railway, Waterside Park, London Docklands, Barratt London



4. Meeting local housing requirements

Does the development have a mix of housing types and tenures that suit local requirements?

- 4a** What types of homes, tenure and price range are needed in the area (for example, starter homes, family homes or homes for those downsizing)?
- 4b** Is there a need for different types of home ownership (such as part buy and part rent) or rented properties to help people on lower incomes?
- 4c** Are the different types and tenures spatially integrated to create a cohesive community?

We recommend

Demonstrating how the scheme’s housing mix is justified with regard to planning policy, the local context and viability.

Aiming for a housing mix that will create a broad-based community.

Considering how to incorporate a range of property sizes and types, avoiding creating too many larger or too many smaller homes from being grouped together.

Providing starter homes and homes for the elderly or downsizing households. People who are retired can help enliven a place during the working day. Providing for downsizing households can also help to rebalance the housing market and may help reduce the need for affordable housing contributions over time.

Designing homes and streets to be tenure-blind, so that it is not easy to differentiate between homes that are private and those that are shared ownership or rented.

We recommend that you avoid

Developments that create homes for one market segment unless the development is very small.

Using exterior features that enable people to easily identify market sale from rented/ shared ownership homes, such as the treatment of garages or entrances.

Reducing the level of parking provision for rented/shared ownership homes.



Mixed tenure houses, Kidbrooke Village, RB Greenwich, Berkeley Homes



Does the scheme create a place with a locally inspired or otherwise distinctive character?

- 5a How can the development be designed to have a local or distinctive identity?
- 5b Are there any distinctive characteristics within the area, such as building shapes, styles, colours and materials or the character of streets and spaces that the development should draw inspiration from?

We recommend

Identifying whether there are any architectural, landscape or other features, such as special materials that give a place a distinctive sense of character as a starting point for design. It may be possible to adapt elevations of standard house types to complement local character. Distinctiveness can also be delivered through new designs that respond to local characteristics in a contemporary way⁷.

Exploring what could be done to start to give a place a locally inspired identity if an area lacks a distinctive character or where there is no overarching character.

Landscaping traditions are often fundamental to character, especially boundary treatments.

Introducing building styles, details and landscaping features that can be easily expressed to someone visiting the development for the first time. Where an area has a strong and positive local identity, consider using this as a cue to reinforce the place's overall character⁸.

Varying the density, built form and appearance or style of development to help create areas with different character within larger developments. Using a range of features⁹ will help to create town and cityscape elements that can give a place a sense of identity and will help people find their way around. Subtle detailing can help reinforce the character of areas and in doing so, provide a level of richness and delight.

Working with the local planning and highway authority to investigate whether local or otherwise different materials can be used in place of standard highways surface materials and traffic furniture. Be creative and adventurous by exploring the potential to innovate - develop new ideas and build with new materials.

We recommend that you avoid

Using the lack of local character as a justification for further nondescript or placeless development. Ignoring local traditions or character without robust justification.



The landscaping of this housing square mirrors the town housing type, Thorley Lane, Bishops Stortford, Countryside Properties

6. Working with the site and its context

Does the scheme take advantage of existing topography, landscape features (including water courses), trees and plants, wildlife habitats, existing buildings, site orientation and microclimate?

6a Are there any views into or from the site that need to be carefully considered?

designed into the development?

6b Are there any existing trees, hedgerows or other features, such as streams that need to be carefully

6c Should the development keep any existing building(s) on the site? If so, how could they be used?



Hard landscaping is responsive to the different levels on site, Osprey Quay, Weymouth, Zero C Developments

We recommend

Being a considerate neighbour. Have regard to the height, layout, building line and form of existing development at the boundaries of the development site. Frame views of existing landmarks and create new ones by exploiting features such as existing mature trees to create memorable spaces. Orientate homes so that as many residents as possible can see these features from within their homes¹⁰. Carefully consider views into the development and how best these can be designed.

Assessing the potential of any older buildings or structures for conversion. Retained buildings can become instant focal points within a development. Where possible, avoid transporting building waste and spoil off site by exploring opportunities to recycling building materials within the development¹¹.

Working with contours of the land rather than against them, exploring how built form and detailed housing design can creatively respond to the topographical character; thinking carefully about the roofscape. Explore how a holistic approach can be taken to the design of sustainable urban drainage by exploiting the topography and geology¹².

Exploring opportunities to protect, enhance and create wildlife habitats. Be creative in landscape design by creating wildflower meadows rather than closely mown grassland and, where provided, creating rich habitats within balancing lagoons, rainwater gardens, rills and swales.

Considering the potential to benefit from solar gain through building orientation and design where this can be achieved without compromising good urban design or creating issues associated with over heating¹³. Finally have regard to any local micro-climate and its impact.

We recommend that you avoid

Leaving an assessment of whether there are any views into and from the site that merit a design response until late in the design process.

Transporting uncontaminated spoil away from the site that could be used for landscaping or adding level changes where appropriate.

Not carefully considering opportunities for rainwater attenuation both on plot and off.

Not carefully thinking about what balancing lagoons will look like and how people could enjoy them as attractive features within an open space network.

Careful thought in the design process can eliminate the need for fenced off lagoons that are both unsightly and unwelcoming.



7. Creating well defined streets and spaces

Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well?

- 7a Are buildings and landscaping schemes used to create enclosed streets and spaces?
- 7b Do buildings turn corners well?
- 7c Do all fronts of buildings, including front doors and habitable rooms, face the street?



A straight building line reinforces clear distinction between public and private spaces, The Strike, Helmsley, Taylor Wimpey

We recommend

Creating streets that are principally defined by the position of buildings rather than the route of the carriageway.

Designing building that turn corners well, so that both elevations seen from the street have windows to them, rather than offering blank walls to the street¹⁴. Consider using windows that wrap around corners to maximise surveillance and bring generous amounts of natural light into people's homes.

Using a pattern of road types to create a hierarchy of streets and consider their enclosure, keeping to the well proportioned height to width ratios relative to the type of street¹⁵.

	Maximum	Minimum
Minor streets, e.g mews	1: 1.15	1:1
Typical streets	1:3	1:1.5
Squares	1:6	1:4

Source: Manual for Streets (2007) p.54
These street to width ratios are for guidance purposes only. If a scheme is landscape led, structural landscaping in the form of large trees and well established hedgerows can provide enclosure instead of buildings.

Respecting basic urban design principles when designing layouts. For example, forming strong perimeter blocks¹⁶.

Orientating front doors to face the street rather than being tucked around the back or sides of buildings.

We recommend that you avoid

Streets that lack successful spatial enclosure by exceeding recommended height to width ratios.

Over reliance on in front of plot parking that tends to create over wide streets dominated by parked cars and driveways unless there is sufficient space to use strong and extensive landscaping to compensate the lack of built form enclosure.

Homes that back on to the street or offer a blank elevation to the street.

Locating garages and/or driveways (or service areas and substations) on street corners or other prominent locations, such as the 'end point' of a view up or down a street.



8. Easy to find your way around

Is the development designed to make it easy to find your way around?

8a Will the development be easy to find your way around? If not, what could be done to make it easier to find your way around?

8b Are there any obvious landmarks?

8c Are the routes between places clear and direct?

We recommend

Making it easy for people to create a mental map of the place by incorporating features that people will notice and remember. Create a network of well defined streets and spaces with clear routes, local landmarks and marker features. For larger developments it may be necessary to create distinct character areas. Marker features, such as corner buildings¹⁷ and public spaces combined with smaller scale details such as colour, variety and materials will further enhance legibility.

Providing views through to existing or new landmarks and local destinations, such as parks, woodlands or tall structures help people understand where they are in relation to other places and find their way around.

Making it easy for all people to get around including those with visual or mobility impairments.

Identifying and considering important viewpoints within a development, such as views towards the end of a street. Anticipate other, more subtle viewpoints, for example a turn or curve in the street and how best these can be best addressed.

Creating a logical hierarchy of streets. A tree lined avenue through a development can be an easy and effective way to help people find their way around.

We recommend that you avoid

Creating a concept plan for a scheme that does not include careful consideration as to how people will create a mental map of the place.

Layouts that separate homes and facilities from the car, unless the scheme incorporates secure underground car parking.



Apartment blocks at corner give streets definition and helps way finding, Bedford Park, Bedford, Barratt Homes



Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?

- 9a Are streets pedestrian friendly and are they designed to encourage cars to drive slower and more carefully?
- 9b Are streets designed in a way that they can be used as social spaces, such as places for children to play safely or for neighbours to converse?



High quality hard landscaping, The Avenue, Saffron Walden, Hill

We recommend

Creating streets for people where vehicle speeds are designed not to exceed 20 mph¹⁸. Work with the Highways Authority to create developments where buildings and detailed street design is used to tame vehicle speeds. Sharp or blind corners force drivers to slow when driving around them while buildings that are closer together also make drivers proceed more cautiously¹⁹. 20mph zones are becoming increasingly popular with local communities and are a cost effective way of changing driver behaviour in residential areas.

Thinking about how streets can be designed as social and play spaces, where the pedestrians and cyclists come first, rather than simply as routes for cars and vehicles to pass through²⁰.

Using the best quality hard landscaping scheme that is viable without cluttering the streets and public spaces.

Designing homes that offer good natural surveillance opportunities; carefully considering the impact of internal arrangement on the safety and vitality of the street²¹. Consider maximising the amount of glazing to ground floor, street facing rooms to enhance surveillance opportunities creating a stronger relationship between the home and the street .²²

Creating homes that offer something to the street²³, thinking carefully about detail, craftsmanship and build quality. Afford particular attention to the space between the pavement and front doors²⁴. A thoughtful and well designed entrance area and front door scheme will enhance the kerb appeal of homes whilst also contributing towards creating a visually interesting street. Carefully consider changes in level, the interface between different materials, quality finishing and the discreet placement of utility boxes.

We recommend that you avoid

20mph speed limits enforced with excessive signage or expensive compliance systems or features.

Designing a scheme that allows drivers to cross pedestrian footpaths at speed to access their driveways. Consider how hard and soft landscaping can be used to make drivers approach their street and home more cautiously and responsibly.

Minimise steps and level changes to make them as easy as possible for pushchairs and wheelchairs.

A pavement that has lots of variation in levels and dropped kerbs to enable cars to cross it can encourage unofficial parking up on the kerb and may make movement less easy for those pushing a pushchair, in a wheelchair or walking with a stick or walking frame.



Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?

- 10a Is there enough parking for residents and visitors?

10b Is parking positioned close to people's homes?

10c Are any parking courtyards small in size (generally no more than five properties should use
- a parking courtyard) and are they well overlooked by neighbouring properties?

10d Are garages well positioned so that they do not dominate the street scene?



Unallocated bays in small shared courts efficiently deal with varied parking demands, The Mill, Horton Kirby, Fairview Homes

We recommend

- Anticipating car parking demand** taking into account the location, availability and frequency of public transport together with local car ownership trends. Provide sufficient parking space for visitors.
- Designing streets to accommodate on street parking** but allow for plenty of trees and planting to balance the visual impact of parked cars and reinforce the spatial enclosure of the street. On street parking has the potential to be both space efficient and can also help to create a vibrant street, where neighbours have more opportunity to see and meet other people.
- Prevent anti-social parking.** Very regular and formal parking treatments have the potential to reduce anti-social parking. People are less prone to parking in places where they should not be parking, where street design clearly defines other uses, such as pavements or landscape features.
- Making sure people can see their car from their home** or can park it somewhere they know it will be safe. Where possible avoid rear parking courts²⁵.
- Using a range of parking solutions** appropriate to the context and the types of housing proposed. Where parking is positioned to the front of the property, ensure that at least an equal amount of the frontage is allocated to an enclosed, landscaped front garden as it is for parking to reduce vehicle domination. Where rows of narrow terraces are proposed, consider positioning parking within the street scene, for example a central reservation of herringbone parking²⁶. For higher density schemes, underground parking with a landscaped deck above can work well.
- We recommend that you avoid**
- Relying on a single parking treatment.** A combination of car parking treatments nearly always creates more capacity, visual interest and a more successful place.
- Large rear parking courts.** When parking courts are less private, they offer greater opportunity for thieves, vandals and those who should not be parking there.
- Parking that is not well overlooked.**
- Using white lining to mark out and number spaces.** These are not only costly, but unsightly. It can be cheaper and more aesthetically pleasing to use small metal plates to number spaces, and a few well placed block markers to define spaces.
- Not providing a clear and direct route between front doors and on-street parking** or not balancing the amount of parking in front of plots with soft relief.



Will public and private spaces be clearly defined and designed to have appropriate access and be able to be well managed and safe in use?

- 11a What types of open space should be provided within this development?

11b Is there a need for play facilities for children and teenagers? If so, is this the right place or should
- the developer contribute towards an existing facility in the area that could be made better?

11c How will they be looked after?



Shared garden, The Square, York, Nixon Homes

We recommend

- Clearly defining private and public spaces** with clear vertical markers, such as railings, walling or robust planting. Where there is a modest building set back (less than 1m), a simple change in surface materials may suffice. Select species that will form a strong and effective boundary, such as hedge forming shrubs rather than low growing specimens or exotic or ornamental plants. Ensure sufficient budget provision is allocated to ensure a high quality boundary scheme is delivered.
- Creating spaces that are well overlooked by neighbouring properties.** Check that there is plenty of opportunity for residents to see streets and spaces from within their homes. Provide opportunities for direct and oblique views up and down the street, considering the use of bay, oriel and corner windows where appropriate. Designing balconies can further increase opportunities for natural surveillance.
- Thinking about what types of spaces are created and where they should be located.** Consider how spaces can be designed to be multi-functional, serving as wide an age group as possible and how they could contribute towards enhancing biodiversity²⁷. Think about where people might want to walk and what routes they might want to take and plan paths accordingly providing lighting if required. Consider the sun path and shadowing throughout the day and which areas will be in light rather than shade. Areas more likely to benefit from sunshine are often the most popular places for people to gather.
- Exploring whether local communities** would wish to see new facilities created or existing ones upgraded. Think how play can be approached in a holistic manner, for example by distributing play equipment or playable spaces and features across an entire open space.
- Providing a management and maintenance plan** to include a sustainable way to fund public or shared communal open spaces.
- We recommend that you avoid**
- Informal or left over grassed areas that offer no public or private use** or value and do little or nothing to support biodiversity.
- Avoid creating small fenced play areas** set within a larger area of open space where the main expense is the cost of fencing.
- Landscaping that is cheap,** of poor quality, poorly located and inappropriate for its location. Low growing shrubs rarely survive well in places where people are likely to accidentally walk over them (such as besides parking bays).



12. External storage and amenity space

Is there adequate external storage space for bins and recycling, as well as vehicles and cycles?

12a Is storage for bins and recycling items fully integrated, so that these items are less likely to be left on the street?

12b Is access to cycle and other vehicle storage convenient and secure?



Robust brick bin stores, Centenary Quay, Southampton, Crest Nicholson

We recommend

Providing convenient, dedicated bin and recycling storage where bins and crates can be stored out of sight. Check with the local authority to determine exactly what space is required and minimise the distance between storage areas and collection points. Where terraced housing is proposed, consider providing integral stores to the front of the property (such as within an enclosed section of a recessed porch) or by providing secure ginnels between properties that provide direct access to the rear of properties²⁸.

Designing garages and parking spaces that are large enough to fit a modern family sized car and allow the driver to get out of the car easily. Where local authorities have requirements for garage sizes, parking spaces and circulation space design these into your scheme from the outset. If garages do not meet local requirements, do not count these as a parking space.

Considering whether garages should be counted as a parking space. If garages are to be counted as a parking space, ensure that sufficient alternative storage space is provided for items commonly stored in garages. Consider extending the length of the garage to accommodate storage needs or allowing occupants to use the roof space for extra storage²⁹.

Anticipating the realistic external storage requirements of individual households. Residents will usually need a secure place to store cycles and garden equipment. A storage room could be designed to the rear of the property (either attached or detached from the home), reviving the idea of a traditional outhouse. More creative solutions may be needed to satisfy the cycle storage requirements of higher density apartment accommodation.

Thinking carefully about the size and shape of outside amenity space. It is a good idea to ensure that rear gardens are at least equal to the ground floor footprint of the dwelling. Triangular shaped gardens rarely offer a practical, usable space³⁰. Allow residents the opportunity to access their garden without having to walk through their home.

We recommend that you avoid

Bin and recycling stores that detract from the quality of the street scene.

Locating bin and recycling stores in places that are inconvenient for residents, or they might find it easier to leave their bin and containers on the street.

Designing garages that are impractical or uncomfortable to use.

Cycle storage that is not secure or is difficult to access.





St Andrews, Bromley by Bow, Barratt Homes

Supplementary design prompts were introduced in November 2014 in response to feedback from users about the need to better address design issues in more urban locations. This supplement deals with issues found where apartment blocks of three or more storeys create new developments with few, if any, new streets and where key design issues are how blocks respond to their locality, existing streets and movement.

Six of the twelve questions now have an alternative prompt to suit urban situations. Whilst the ethos of each question remains the same the emphasis and considerations reflect better the challenges and considerations associated with more urban locations and higher density developments. We recommend that design teams agree with the local authority which version of the questions are most appropriate to any proposed development.

Connections and scale

Does the scheme respond to the scale of its surroundings, respect existing view corridors (or create new ones), and reinforce existing connections and make new ones where feasible?

Design rationale: To emphasise visual connectivity whilst ensuring that where possible, the opportunity is taken to make physical connects that are going to be well-used and of benefit to residents and the wider community.

Easy to find your way in and around

Is the scheme designed to make it easy to understand the links between where people live and how you access the building, as well as how you move through it?

Design rationale: To emphasise the importance of creating a well defined entrance(s) to a development. Is it easy to find the front door?

Active Streets

Does the development engage with the street so passers-by will understand the movement between the building and the street, and is there an obvious visual link between inside and outside?

Design rationale: To emphasise the importance of creating active edges to a development at street level, carefully consider how the building relates to the street, how vehicle and servicing is designed and to avoid dead elevations.

Cycle and car parking

Will the development be likely to support and encourage cycling by providing cycle storage which people can use with confidence? Where parking is provided, is this easy to use? Are accesses to car parking designed not to impact on those not in cars? Are entrances to car parks over-engineered, visually obtrusive or obstructive to pedestrians and cyclists?

Design rationale: To emphasise the modal emphasis on bikes in more urban development where people are more likely to live close enough to work and leisure to cycle. Seeks to also promote well-designed entrances to parking areas whether at grade or underground.

Shared spaces

Is the purpose and use of shared space clear and is it designed to be safe and easily managed? Where semi-private or private spaces are created, are these clearly demarcated from the public realm?

Design rationale: To emphasise the importance of designing such spaces to be functional, attractive and well used.

Private amenity and storage

Are outdoor spaces, such as terraces and balconies, large enough for two or more people to sit? Is there opportunity for personalisation of these spaces? Is waste storage well integrated into the design of the development so residents and service vehicles can access it easily whilst not having an adverse impact on amenity for residents.

Design rationale: To focus on practical balcony sizes and well designed communal waste facilities that are well resolved in relation to building entrances and screened from publicly accessible routes.





Kilburn Park, South Kilburn, Catalyst and London Borough of Brent

BfL12 is effective where local authorities use it as a way of working, framing pre-application discussions relating to design and support decision-making against the twelve questions. Yet, BfL12 is at its most effective where it is used as a 'golden strand'. The 'golden strand' comprises of a series of elements. Local authorities are encouraged to work towards putting each of these elements in place. In some situations, we recognise it might be difficult or impossible to embed or achieve each of these elements for a variety of local reasons. The more elements that are in place the better and more effective BfL12 can be in your local area.

What are the elements?

- **Strategic leadership** – senior Elected Members and Chief Officers supporting BfL12 and understanding why it is important. Securing a Cabinet or Committee resolution to adopt BfL12 as a way of working and as an expectation of future planning applications is a great start.

- **Cross authority consistency.** If neighbouring local authorities work together and use the same method to frame discussions and decision making around design considerations, it will become even better and easier for those involved in the planning and design process.
- **In house training** – you can do it yourself or by contacting your local architecture centre or Design for Homes. Getting officers and Elected Members to understand what BfL12 is and why it is important. It can help people understand what happens when developments are created without the BfL12 principles in mind.
- **Local Policy.** BfL12 is supported by the NPPF and therefore local planning authorities are encouraged to adopt BfL12 as a measure of quality.
- **Tell home builders that are active in your local area** that you are using BfL12. Why not organise a low cost event to launch BfL12 locally and bring together developers, local designers and the local authority? Design for Homes can offer guidance and assistance.
- **How are we doing? Post completion review.** BfL12 is a useful tool to understand how well recently completed developments have been designed. Some local authorities use BfL12 performance as a key indicator to help measure the impact and effectiveness of their planning services. Some local authorities engage developers in these reviews as a constructive critique of what is being collectively created.
- Using BfL12 to **structure pre-application** discussions relating to design. The 12 questions are a useful aide mémoire and help to ensure that every aspect of a proposed development has been well considered.
- Using BfL12 to **support planning decisions.** Not every scheme can achieve 12 'greens', but 'reds' should always be avoided.

Market conditions would merit a 'green' where good standard house types are used, but built with a locally appropriate materials palette. Conversely, an increased expectation for a more locally tailored or bespoke approach would be reasonable in a stronger market area.



Using BfL12 on **outline applications** to help safeguard the quality of future applications. It is a good idea to secure BfL12 at outline stage by doing two things:

First, by establishing and securing **key principles** in an illustrative masterplan. For instance, connections (Question 1); which will in turn minimise walking distances between existing or local facilities or services/public transport (Questions 2 and 3), capture opportunities and constraints that may impact on the amount or cost of development (Questions 5, 6 and 7) for instance:

- If a site is adjacent to existing development it is good practice to respect existing built form along development boundaries (for example, storey heights and plot character).
- Views into, out of and through a site that need to be respected by way of either 'no build corridors' or location where a lower built form would be appropriate.
- Existing built or natural features.
- The need to 'feather' or 'lighten' development if a new, and permanent edge to a settlement will be formed adjacent to open, undeveloped land such as countryside, heathland or woodland.
- Robust perimeter block structure.

It is also useful to consider whether the proposed coverage of a scheme (i.e. number of units) will provide or compromise the ability to provide sufficient and well integrated parking provision based on local circumstances (Question 10).

Second, by attaching a concise condition to any outline planning approval that requires a developer to demonstrate that any future Reserved Matters application performs well against BfL12.

Such a condition will be useful to land buyers, particularly where an outline application is submitted by a land promoter - rather than a developer. Such a condition can be justified on the basis of the need to secure a good standard of design as required by the NPPF. A 'Note to Applicant' should encourage any Reserved Matters applicant to *'engage with the local planning authority at an early stage, using BfL12 as basis for discussions relating to design'*.

Celebrating and recognising quality. Ensure that developers that secure Built for Life™ accreditation are recognised. A 'well done' press release and photo shoot with a developer and a local politician can help raise positive interest in a new development when sales activity begins. This in turn can help raise wider public and industry interest and demand for Built for Life™ accredited schemes.



Bridport House, Hackney, London Borough of Hackney

Ensuring the local highways authority are aligned with Manual for Streets and in turn Question 9. This can be more challenging in two tier authority structures. As such, the ability of a scheme to achieve a 'green' against this question may well be constrained – and justified – by regulatory constraints. Of all the BfL12 questions this is consistently the most challenging and discussed across the country!

In some regions, local highways authorities are working together to refresh local highways design standards to better align these with Manual for Streets and BfL12. We warmly welcome these changes to highways standards.

Finally, keep Elected Members and Chief Officers engaged in BfL12. The nature of these leadership roles is that they are often 'desk bound'. As such, it often takes little persuasion to get a Portfolio Holder and the Chief Executive in a car for a few hours a couple of times a year with an well informed officer to see how design quality is improving locally – and discuss areas for improvement or greater focus.

If your local authority helps a developer secure a **Built for Life™** quality mark, contact Design for Homes to order your own quality mark plaque³. These attractive and eye catching certificates are a visible reminder of the good work of the planning team in your authority.



Roseberry Mansions, Kings Cross, One Housing

As outlined before, Building for Life's 12 questions are grouped in three distinct sections:

1. **Integrating into the neighbourhood**
2. **Creating a place**
3. **Street and home**

Based on a simple 'traffic light' system (red, amber and green) we recommend that proposed new developments aim to:

- Secure as many 'greens' as possible,
- Minimise the number of 'ambers' and;
- Avoid 'reds'.

The more 'greens' that are achieved, the better a development will be. A red light gives warning that a particular aspect of a proposed development may need to be reconsidered. However, it is important to recognise there will be schemes of substantial merit that might trigger one or more red lights in the first chapter, such as:

Integrating into the Neighbourhood

For example, take a rural exception site in a beauty spot where soaring house prices have priced out local people. A scheme of just 6 houses for rent - perhaps some distance from a bus stop and with limited access to other amenities would fail questions 2, 3 and 4.

In such cases, it is important to consider the flexibility to make 'waivers' (which in turn, would 'upgrade' an otherwise 'red' indicator to an 'amber'). However, waivers should be supported by the local planning authority and highlighted early in the design process.

Yet, it is important to note that we would not recommend that any scheme is permitted a 'waiver' against any questions within the chapters named 'Creating a place' and 'Street and home' sections as these questions relate to design features that no scheme should be without. For instance, there is no reason to build a development where footpaths are not overlooked and safe or where front doors do not face the street.

For these reasons, whilst we encourage local authorities to adopt BfL12, we strongly recommend that they avoid explicitly setting a requirement for every proposed development to achieve 12 'greens'. Such an approach is not consistent with the creative and collaborative ethos at the heart of BfL12 within a time where we are facing a major under supply of new homes.

Instead, we recommend local policies to refer all proposed developments to use BfL12 as a design tool throughout the pre-application and community engagement stages.

Rather than local policies requiring all schemes to achieve 12 'greens', local policies should require all proposed developments to perform positively against BfL12 with the maximum number of 'greens' secured, with 'reds' avoided and 'ambers' well justified.



¹Department for Communities and Local Government (2011) 'Laying the Foundations: A Housing Strategy for England', HMSO <http://www.communities.gov.uk/publications/housing/housingstrategy2011>. Further supported by the National Planning Policy Framework (2012) and the Localism Act and Planning Practice Guidance.

²According to the Farrell Review (2014), a government-commissioned inquiry into design quality by an independent panel of notable experts, BfL12 can help in creating a "collective vision shaped in collaboration with local communities, neighbourhood forums and PLACE Review Panels." www.farrellreview.co.uk Accessed 31.3.2014

³To find out more about obtaining Built for Life quality mark please visit www.builtforlifehomes.org. Building for Life training and support (including facilitation of community workshops using BfL12) is available locally through the Design Network www.designnetwork.org.uk

⁴It may be that it is agreed between those involved that one or more 'ambers' are justified. We recommend that 'ambers' are normally only justified on those questions where issues may be outside of an applicant's control, i.e. within the 'Integrating into the Neighbourhood' section.

BfL12 Question:	Issue:	Justification:
1 Connections	Inability to provide full connectivity	Third party land ownership.
2 Facilities and services	Lack of facilities and services	Part of a larger development where facilities and services are planned as part of a later phase. Rural Exception Sites.
3 Public transport	Lack of public transport	Part of a larger development where public transport services are planned as part of a later phase. Rural Exception Sites.
4 Meeting local housing requirements	Non-policy compliant	Accepted by the planning authority as justified on viability grounds.

⁵For strategic developments, such as sustainable urban extensions.

⁶On larger developments.

⁷A simple test is to ask how the architecture whether traditional or modern acknowledges and enhances its context. But there is no benefit in recycling tradition if treatments are not locally authentic.

⁸However, this does not require pastiche. The aim is to exploit qualities in the character of local stock and link to them, not replicate them, but at the same time recognising that in some circumstances there is a need for a step change in approach to overall design ethos and approach.

⁹Such as landscaping, tree lined streets, parks, greens, crescents, circuses, squares and a clear hierarchy of streets such as principal avenues, lanes, mews and courtyards, as well as colour, landscaping and detailing.

¹⁰Consider using windows where appropriate to frame views from within the home.

¹¹Weathered materials can help add instant character whether within retained structures or reused as to create boundary walls, plinths or surface treatments.

¹²For example by using permeable paving and creating a network of rills, swales, rain gardens and green roofs where suitable.

¹³East-facing bedrooms are very popular for morning sun, while west-facing or south-facing patio gardens and living rooms boost their appeal in spring and autumn. In higher density schemes endeavour to have at least one principal room being able to receive sunlight through some of the day.

¹⁴These windows need to serve habitable rooms where occupants tend to spend a lot of their day rather than bathrooms, hallways, stairwells and cloakrooms.

¹⁵These may need to be varied within medium to higher density schemes.

¹⁶Where buildings create the outside edge of the block and interlocked back gardens and/or shared amenity spaces create the middle.

¹⁷Perhaps incorporating commercial premises where viable or designing flexible units that could be easily remodelled to accommodate commercial premises in the future.

¹⁸By restricting forward visibility, using vertical features such as raised plateaus and/or designating Home Zones. Carefully consider the impact of features such as over engineered corner radii on vehicle speeds and pedestrian safety and comfort. See www.20splentyforus.org.uk.

¹⁹See <http://assets.dft.gov.uk/publications/manual-for-streets/pdfmanforstreets.pdf>.

²⁰Shared surfaces may be appropriate in low traffic areas though carefully consider how shared environments can still be navigable by those with visual impairments.

²¹First floor living rooms can be very effective for this purpose, even more so with bay or corner windows and balconies. The key attribute is that windows that face the street should be from habitable rooms where occupants are likely to spend a lot of their day.

²²Whilst also maximising the amount of natural light penetrating internal spaces.

²³Such as colour, detail, craftsmanship or other form of artistic expression and creativity.

²⁴Or shared access for apartment accommodation.

²⁵If rear parking courtyards are used, keep them small, so that residents know who else should be using it. Make sure at least one property is located at the entrance to the parking courtyard to provide a sense of ownership and security. Avoid multiple access points. Allow sufficient budget for boundary walls, surface treatments, soft landscaping and lighting to avoid creating an air of neglect and isolation. Contact the local Police Architectural Liaison Officer to determine whether local crime trends justify securing the courtyard with electric gates.

²⁶To avoid a car dominated environment, break up parking with a tree or other landscaping every four bays or so but ensure that the landscaping still allows space for people to get into and out of their cars, without having to step onto landscaped areas.

²⁷Discussions with local police officers and local community groups can be a useful source of information on what works well and what does not in a particular area and can help guard against creating potential sources of conflict.

²⁸If storage is provided within the rear garden, think about how bins and containers can be discreetly stored out of sight.

²⁹Non solid garage doors can dissuade residents from using these spaces as storage areas, but this will only be effective where sufficient alternative storage space is provided and where Permitted Development Rights are removed and enforced.

³⁰Where balconies are provided, design these generously so that they are large enough for a small table and at least two chairs.

References:

Department for Communities and Local Government (2012) National Planning Policy Framework, HMSO

Department for Communities and Local Government and Department of Transport (2007) Manual for Streets, HMSO

The Institution of Highways and Transportation (2000) Guidelines for Providing for Journeys on Foot, London. www.ciht.org.uk



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We also wish to thank all those who offered their time to respond to the online surveys, your views and opinions were invaluable in helping to shape Building for Life 12. The authors, editors and Building for Life Partnership apologise to those we have not been thanked by name, your support is greatly appreciated.

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Building for Life 12 (BfL12) is a way of working that local communities, home builders and local authorities are invited to use as a design tool for creating better designed homes and neighbourhoods.

Barratt has been using Building for Life 12 since it was introduced, it's an important tool to demonstrate to local authorities that we have carefully thought about the design and sustainability of our development in a structured, objective way. It gives people confidence in the quality of our finished product.

Adam Tillion, Regional Technical Director, Barratt Homes

To improve the approach to design, the Government proposes to amend the National Planning Policy Framework to... recognise the value of using a widely accepted design standard, such as Building for Life in shaping and assessing basic design principles. These principles are crucial to the success of a scheme, but often get less attention than what a house looks like. They should be reflected in plans and be given sufficient weight in the planning process.

Department for Communities and Local Government (2017) Fixing our broken housing market, p.29-30.

David Birkbeck and
Stefan Kruczkowski

www.builtforlifehomes.org

Appendix X iv



urban forward ltd

t: 07980 743523
e: info@urbanforward.co.uk
w: urbanforward.co.uk
@urbanforward

Parker Planning Services Ltd
Northgate Business Centre
10 Northgate Street
Bury St Edmunds
Suffolk
IP33 1HQ

04.12.2019

Dear Sir or Madam,

Rendlesham Building for Life 12 Independent Assessment

This letter accompanies the report produced by us in which we undertook an assessment of the proposed development to the north of the village of Rendlesham, Suffolk using the BfL12 system. It should be noted that this letter should be read in conjunction with that report, to help clarify how the scope of the BfL12 report overlaps – or doesn't – with our overall view of the design proposal. Please note we are also currently engaged in developing the new Suffolk Design Charter.

Building for Life 12 is a useful tool for achieving good design, but it has to be used properly and at the right time in the design process to be fully effective. It also has to be understood by the people using it that there may be design solutions not recommended within BfL12 that nevertheless deliver the same intended outcomes.

In 2018, a new version of BfL12 was published by the BfL Partnership, to which we are a contributing editor. This version differs from the previous 2015 version primarily because it makes clear that BfL12 is best used as a tool for design development, not assessment. That is not to say that BfL12 cannot be used for this purpose, merely that it is not its core function.



A key issue that we found when using BfL12 in the case of Rendlesham was a difference between standardised best practice and what is supported by evidence in this specific case. A case in point is the generally accepted approach to design to minimise crime. The design proposal features some layout arrangements that would be expected, statistically, to be more vulnerable to crime. However, disaggregating causal factors in determining crime susceptibility is a difficult task, and isolating variables is inherently tricky. In this case, what we have is solid data on incidences of crime that show that the existing development designed to the same principles is the least prone to criminal issues in the entire village. So, whilst BfL12 can tell you what *generally* works, here we have an example of a design approach that *specifically* works in terms of minimising crime. Outcomes matter.

Indeed, the recently launched National Design Guide is written expressly to shift the focus to outcomes rather than design specifics. Outwardly and similarly to BfL it sets out ten characteristics of a well-designed place, each of which is a statement of performance or results. In this way, it allows space for design solutions that can demonstrate the required characteristic as an outcome, much as the design team are doing here.

In summary, we have tried to use the BfL12 system to appraise the design in a fair and disciplined way, sticking closely to the recommendations contained within it. However, that does not mean that this is our definitive view of the design proposal. We expect to prepare a full design appraisal - of which BfL12 will only be a part – in due course in this appeal.

Yours truly,

Garry Hall
Director

Encl. BfL Assessment

Land North Of Gardenia Close And Garden Square Rendlesham, Suffolk



Produced Nov 2019 for
CC Developments



urban forward ltd

Introduction and scope

Urban Forward Ltd have been instructed by Capital Community Developments Ltd to undertake an independent Building for Life 12 Assessment of their proposal for 75 new homes to the north of Rendlesham, Suffolk. The scope of this commission is as follows:

- To undertake a BfL12 review from an impartial standpoint
- To compare and contrast the findings of this review with that of the Local Planning Authority
- To provide a commentary on the design proposal, and form a view of its acceptability in urban design terms

Limitations

It should be noted that whilst every effort has been taken to fully understand both the proposal and its genesis, and the views of the Local Planning Authority, it is possible that relevant background information has been missed or not given due weight. Also, whilst BfL12 can and is used by many organisations to undertake retrospective reviews of design proposals, this is not its intended purpose as it is best used to influence designs as they emerge.

Also, the guidance within it needs to be understood by the user in terms of principles and outcomes – that is, what the guidance is trying to achieve – rather than being simply taken as read. In some cases, there are other design solutions to a particular problem that achieve the same outcome, and BfL12 was written to not preclude innovative solutions being developed.

Competency

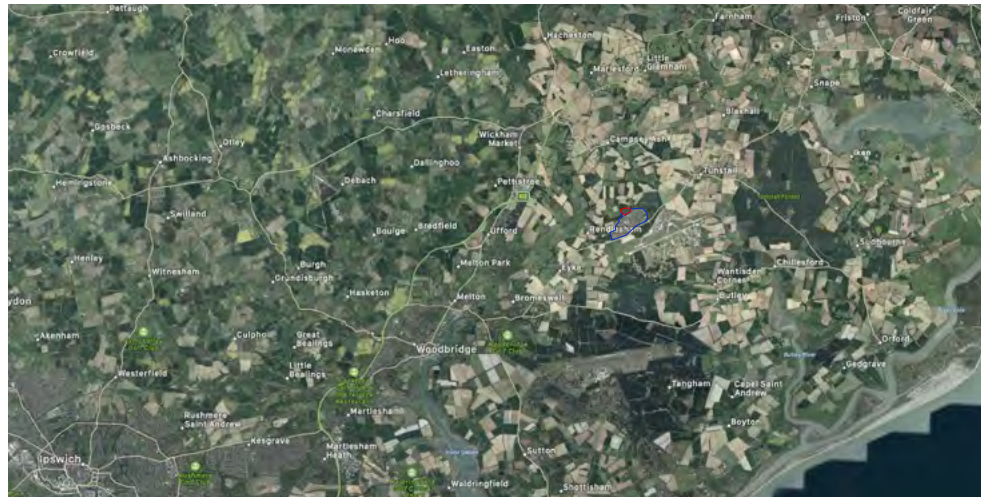
Urban Forward Ltd are part of the editorial team for BfL12, and work closely with Design for Homes and the BfL Partnership to develop BfL, train others on how to use it, and to conduct BfL12 assessments. We also help adjudicate on designs that wish to be recognised as 'Built for Life', the accreditation available to schemes that perform particularly well in terms of the 12 questions in BfL.



The site and location

The proposed development site is located in the village of Rendlesham, East Suffolk. The site sits to the northern edge of the village, adjacent to two recent developments by Capital Community Developments and by Persimmon Homes. Rendlesham is a relatively new village of American heritage, and as such exhibits development patterns that reflect this more recent period of design and site layout.

Right: The site in the very wide context of Suffolk, with Ipswich to the south west, and the coast to the east.



Right: Rendlesham with the site sitting to the northern edge, adjacent to Tidy Road and Garden Square.



The BfL12 Questions



Integrating into the neighbourhood

1 Connections

Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones, while also respecting existing buildings and land uses around the development site?

2 Facilities and services

Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?

3 Public transport

Does the scheme have good access to public transport to help reduce car dependency?

4 Meeting local housing requirements

Does the development have a mix of housing types and tenures that suit local requirements?



Creating a place

5 Character

Does the scheme create a place with a locally inspired or otherwise distinctive character?

6 Working with the site and its context

Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and microclimates?

7 Creating well defined streets and spaces

Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well?

8 Easy to find your way around

Is the scheme designed to make it easy to find your way around?

Street and home

9 Streets for all

Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?

10 Car parking

Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?

11 Public and private spaces

Will public and private spaces be clearly defined and designed to be attractive, well managed and safe?

12 External storage and amenity space

Is there adequate external storage space for bins and recycling as well as vehicles and cycles?



A photograph of a residential street scene. In the foreground, a tree with bare branches stands on the right, and a green hedge runs along the bottom. A grey utility pole is visible in the lower left. In the background, there are brick buildings with white-framed windows. The text "Integrating into the neighbourhood" is overlaid in white on the lower half of the image.

Integrating
into the
neighbourhood

1: CONNECTIONS

Does the scheme integrate in to its surroundings by reinforcing existing connections and creating new ones; whilst also respecting existing buildings and land uses along the boundaries of the development site?

The site is designed to use two principle points of connections for vehicles, plus several pedestrian connections. The vehicle connections link up through the site to create a minor through-route. Pedestrians can access the site via the proposed street entrances, and via footpath connections near to the existing Peace Palace.

Land has been reserved for a bridleway to the east of the site that will provide rural connectivity beyond the site, and this is accessible from within the development. The routes provided through the site should offer good access to the bridleway for residents living in adjacent areas. In all, the design team have created connections where possible and bearing in mind the site's edge of settlement location.

Given the relatively small size of the site, the number of connections is acceptable and their location along the boundaries which adjoin neighbouring developments provides for good access to adjacent neighbourhoods. A 'green' is justified for this layout.



The proposed
access from Tidy
Road



The proposed
access from Garden
Square



Tidy Rd

Gardenia Close

2. FACILITIES AND SERVICES

Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?

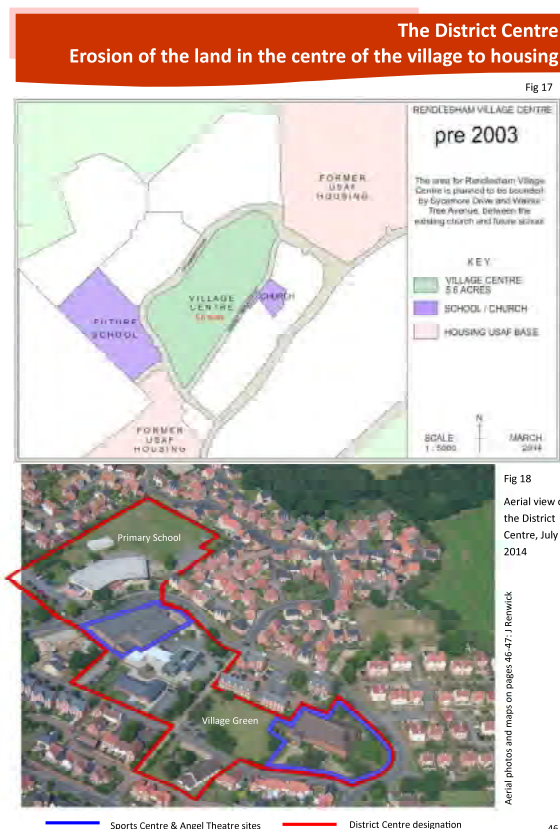
Whilst on the edge of the existing settlement, the proposed development site is within walking distance of the shops and other services provided. The school on Sycamore Drive, the shops on Walnut Tree Avenue, and employment areas such as that on Acer Road are all within easy reach of the development. The Rendlesham NDP seeks to support the existing district centre, so facilities in the area should improve (see map, inset)



The development itself is too small to be reasonably expected to provide on-site mixed-use development, especially given it's edge-of-settlement location.

Internally, the design creates a large area of open space, and two smaller feature spaces. These are accessible from adjacent neighbourhoods, and it is understood that these are to be designed to a similar standard as spaces on Garden Square. Overall, the scheme should contribute to the vitality and viability of existing facilities and create useful new open spaces.

Given the relative proximity of the site to existing facilities and the provision of new spaces on site, a score of 'green' is justified here.





3. PUBLIC TRANSPORT

Does the scheme have good access to public transport to help reduce car dependency?

There are existing bus routes on Sycamore Drive and Redwald Road, which are within walking distance of the site. The applicant has been requested to fund solar powered real time bus information screens in these locations.



The streets within the site are likely to be too narrow to accommodate a bus, unless it was a hopper bus of some sort. However, given the site's location at the edge of the settlement it is not likely that a bus route here would be required. Rail connectivity is more of an issue, with the nearest station being several miles away. However, there are two stations within 5 miles of the site.

The design allows for access to existing bus routes, which justifies a score of 'green' for this question.



Harry Way

Mayhew Rd

Surfalk Dr

Avocet Mews

Alce Rd

Close

BUS ROUTE

Spencer Dr

Garden Sq

Thellusson Rd

Spencer Rd

1st Rd

Wickham Field Rd

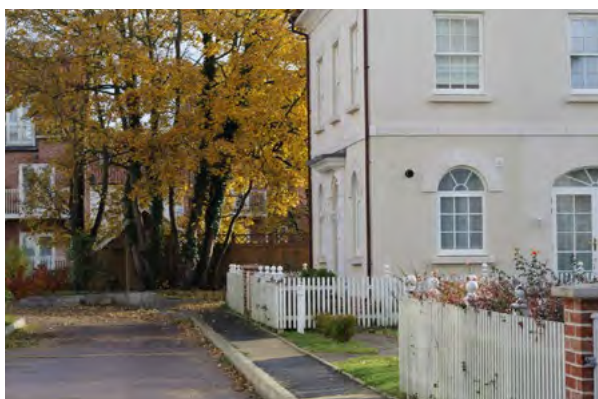
A1152

4. MEETING LOCAL HOUSING REQUIREMENTS

Does the development have a mix of housing types and tenures that suit local requirements?

The design includes a wide range of dwelling types, from 1 bed through to 4 bed units. These have been distributed throughout the site to avoid any one type of dwelling being overly clustered. This is not immediately apparent from looking at the proposal in plan form, as the design uses buildings that are similar in form even if they have very different internal configurations. The balance of dwellings is reasonable, with 37 apartments through to the 18 detached houses.

In terms of affordable housing, 25 of the proposed 75 units will be affordable as defined by the LPA's planning policy. There is a mix of discount sale and affordable rent units provided. Given the mix and distribution of units, and the amount being offered as affordable, the proposal scores a 'green' for this question.



Example maisonette block from the adjacent area.



Detached house, representative of what is intended for this site.







Creating a
place

5. CHARACTER

Does the scheme create a place with a locally inspired or otherwise distinctive character?

There are several ways in which this proposal generates a distinctive character, some of which are at odds with usual urban design best practice. In terms of both the site layout and building floorplans, the design uses very specific principles that relate to natural light and the way spaces relate to the orientation of the sun at certain times of the day. To do so, all of the properties face east, as on the adjacent development around the Peace Palace. This configuration is very distinctive, and creates a place unlike those found commonly elsewhere. The standard relationships between buildings and public space are therefore not possible in many instances (discussed in Q7: Creating well-defined streets and spaces).

In terms of the built form, the proposed buildings have a degree of uniformity in their scale and mass that means they create a cohesive district, much like the adjacent development designed to the same principles. The architectural detailing of the buildings is of high quality, and the treatments applied to building appearance have been carefully arranged to create set-pieces (see plots 25, 29, 11, and 7 for example). The chosen aesthetic is not especially adventurous or innovative, using mainly neo-vernacular styling cues, but this has been well-executed. The large windows and light-wells are distinctive to this design and the principles behind it. In all, these factors add up to create a place with a distinctive character which allows a 'green' score to be awarded.

Given the above, the proposal can be awarded a 'green' for this question.





A typical street in the area, adjacent to this site.



A street similar to that proposed in the scheme.



A private drive from an adjacent site, with minimal landscape or character.



A private drive as proposed within the development, with more space given over to landscaping.



Large detached houses in the areas, adjacent to the site.



The proposed dwelling style for the site, more richly detailed and better executed.

6. WORKING WITH THE SITE AND ITS CONTEXT

Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and microclimates?

The site is at present an open field. Ecological interest is therefore restricted to the tree and hedgerow belts at the edges of the site. The design allows for these to be maintained. The site is flat, and features only a small drainage ditch (see FRA map, inset). Surface water is managed through swales which form part of a sustainable urban drainage system. There are no real opportunities to retain features within the site as there is nothing to retain. The design does, however, allow ample space for the existing landscape to be retained, and a study has been conducted to ensure that existing trees are protected during construction.



The principles behind the design mean that microclimate and site orientation are key influencing factors for the design. Existing buildings to the south have been designed and laid out in the same way, which means this proposal would create an extension to this. The development along Tidy Road is very different, and not in its self a character or identity that forms part of the wider context.

It is difficult to justify a 'green' score for this question given that there is very little by way of site context or features to influence the design. However, this is not the fault of the design team so an 'amber' is justified here.

Proposed Residential Development
Area 8, Rendlesham, Suffolk

Flood Risk Assessment

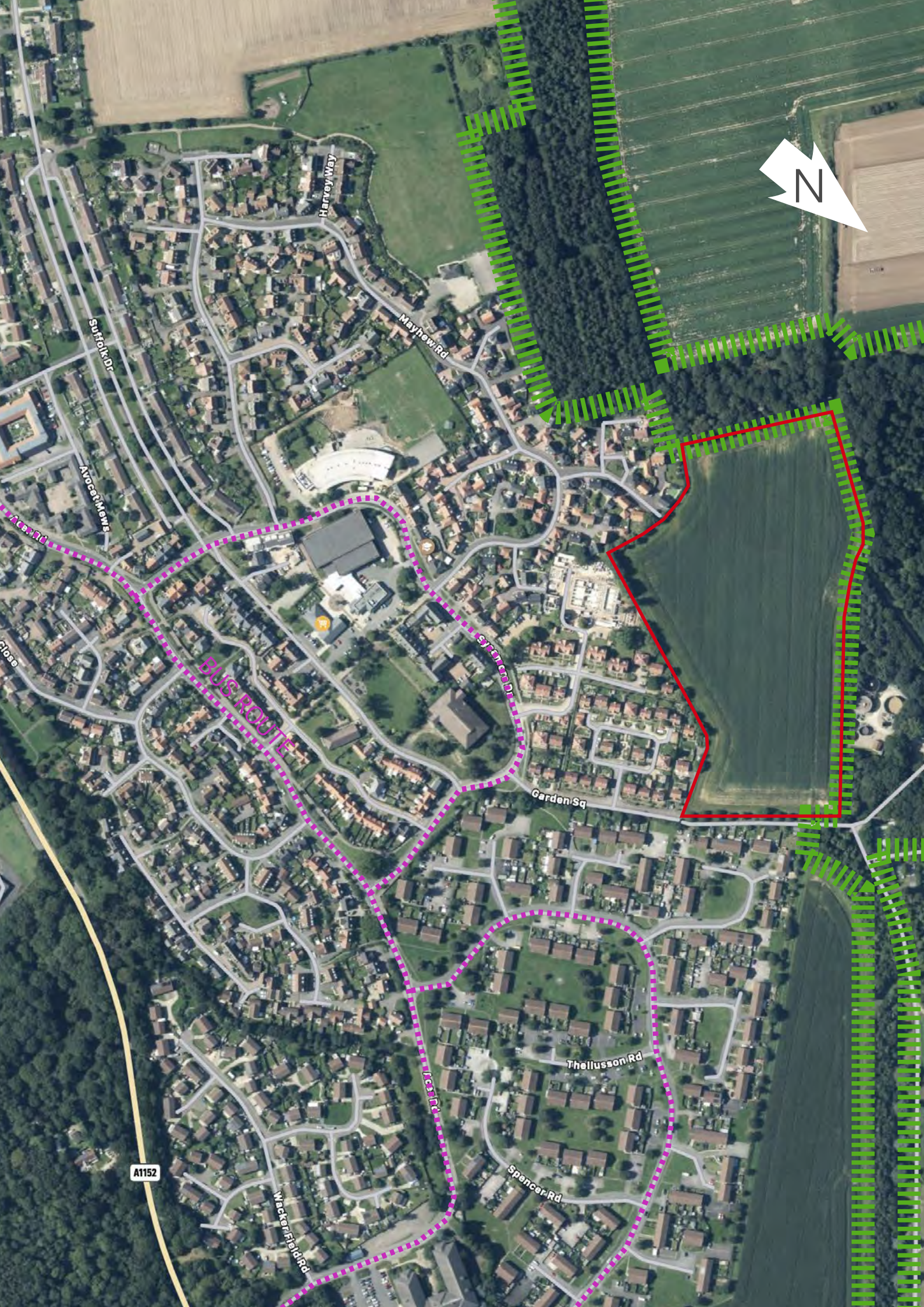


Figure 02 – FEH hydrological catchment

- 3.1.3 There is what appears to be an open watercourse in the vicinity of the site which forms the site's east boundary. This is shown in photograph 2 and was dry during our site visit. Neither the topographical mapping, the site survey, nor our thorough site observations revealed any piped in/outflow to this watercourse, or any continuation of the watercourse up or down stream of the site (was quite overgrown at the upstream end). The watercourse is not situated within a local valley. The surveyed low point in this linear feature is 1/3 from its southern extent. At its downstream end (south east corner of the site) we were able to clearly see the end to the channel at which there was no pipe or other outfall. So the watercourse is assumed to be a local soakaway feature, possibly historically associated with a former track which is shown parallel to this location on historic mapping.



Photograph 2 – Watercourse at east of site – view upstream



Harry Way

Mayhew Rd

Surfak Dr

Avocet Mews

Ace Rd

Close

BUS ROUTE

Spencer Dr

Garden Sq

Theilsson Rd

Spencer Rd

W. Jackson Field Rd

A1152

7. CREATING WELL DEFINED STREETS AND SPACES

Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well?

The principles that underpin the layout of the proposal make meeting the requirements of this question difficult. By facing all of the properties east, traditional perimeter blocks cannot be formed. Perimeter blocks have essentially two main functions; they enable activity and overlooking to the street from the fronts of buildings, and they protect garden and private spaces from public access. Instead, backs of plots are addressed by the fronts of adjacent properties and so on. This naturally reduces the overall amount of surveillance to the street, which is addressed only on one side.



There are ways in which this can be mitigated. Firstly, where buildings front onto rear boundaries, effort has to be made to maximise the amount of activity in these spaces. Placing parking in these spaces, and ensuring front doors and windows address these spaces is critical. This layout does this well, and given that these spaces are relatively small then this should go some way to addressing overlooking and feelings of safety and security. They are also generously landscaped, as is evident on the adjacent housing area that this designed extends. The landscape helps to protect the rear boundaries of the properties on the other side of the lanes, so that their gardens remain private. The overall result is still not as secure or enlivened as would be the case if perimeter blocks had been used, but many of the negative aspects of this kind of arrangement have been addressed.

One area where the design struggles to create active frontages to important spaces is along the central street through the site. The properties that form the edge of this street have their front doors accessed from the drive in front of them, perpendicular to the street. Corner-turning units with windows in the flank elevations have been used, which adds a degree of passive overlooking to the street edge. The regular arrangement of side streets means that the corner properties have oblique views along the street, helping to ensure it is overlooked.

The landscape proposal helps to add green edges to the street. Using a strong boundary treatment helps to define the street edge, and makes them pleasant spaces to be. However, given the reduction in overall active edge to streets due to the orientation of the buildings, an 'amber' is justified here.

8. EASY TO FIND YOUR WAY AROUND

Is the scheme designed to make it easy to find your way around?

The layout, whilst unconventional, is simple and should be easy to navigate. Important in wayfinding is the ability to see down the street, and the strong rectilinear form proposed means that long views across the site are possible when approaching from the east. It is less easy to navigate in terms of finding specific properties, even if the user understands the nature of the layout. This is due to the side streets / private drives being relatively uniform, so one looks much like another. The feature spaces and open space help by adding wayfinding features into the scheme. Views to the tree belt to the north should be possible from anywhere in the site, which means orienting yourself should be easy.

The street treatment creates a hierarchy which should aid wayfinding, with the specific design reflecting the role of the street in the movement system. The main street is more formal, with footpaths either side, and is the most important route in terms of linking the site to the outside world. There is a street that runs to along the western boundary that is only for local access, and this has been designed to be more like a lane, denoting its lesser role in movement terms. The drives that allow access to the properties are shared surfaces, which will make them feel like intimate, private spaces that are for local access only. In this way, the street design supports navigation and the design can be awarded a 'green' for this question.









Street and home

9. STREETS FOR ALL

Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?

The side streets / drives are shared surfaces that will be pedestrian friendly with low vehicle speeds. The main street has speed bumps that should help moderate traffic speeds, and footpaths to both sides. The use of speed bumps is not ideal; a better approach would have been to use pinch-points, build-out and street trees to moderate vehicle speeds.



Where this becomes a lane, the surface treatment here will mean this street acts more like a shared surface than a road. The overall impression will likely be similar to that of the development around the Peace Palace, which is a safe, calm and inviting street system.

Given the relatively basic approach to traffic calming and the lack of visitor parking etc on the main street, it is difficult to give this aspect a 'green' as more could have been done in terms of designing the streets. However, to maintain the principles of the layout, restrictions on how the streets could be treated are inherent, thus an 'amber' is justified here.



Traffic calming features such as this in Ingress Park, Kent add character and would be a good option for this site.



Main streets in the rest of the village do not offer streets for all.



The proposal features streets that will be more pedestrian friendly than many.



Lack of landscape on this street reduces quality.



The streets within the proposal are likely to feel very green and pleasant.

10. CAR PARKING

Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?

Purely in terms of numbers, the proposal provides enough parking for scheme. Most of this is front-of-plot, which is convenient for users but which, if used extensively, can create unsightly street scenes. However, in this instance the specific layout used means this will be less of a problem. The short private drives eliminates very long runs of this kind of parking. Also, because of the generous landscaping, the impact of this parking on the quality of street scene is likely to be minimal.

Visitor parking on the main street could have been included and used as part of the traffic calming strategy. Some garages are provided, but it is likely that garages would be used for other storage, not for parking cars. Open car ports are better used by residents.

Whilst it would be usual to give a design that relies heavily on one type of parking solution either an 'amber' or a 'red', in this instance the specifics of the design mean that the BfL question is well addressed. The parking will not dominate the street, and is well-integrated. A 'green' for this question is justified in this instance.





Main streets elsewhere in the village are often used for parking, which when not integrated into the street seen harms quality.



By integrating the parking into the plots, the scheme creates a neat and tidy street.



The lack of landscaping and the fact that the streets are 'double loaded' leads to this arrangement being problematic elsewhere.



Frontage parking, which is sometimes problematic, has been masked by good landscaping.

11. PUBLIC AND PRIVATE SPACES

Will public and private spaces be clearly defined and designed to be attractive, well managed and safe?

Due to the principles that underpin this layout, there are many instances where boundaries to public space are made up by landscape areas which will need management and maintenance. Done well, then this should not be an issue going forward and should help to create a green and pleasant development. However, should management fail in the future then these spaces will become problematic. Care has been taken to put in place a management structure that will ensure this is unlikely to happen, but it should be caveated at this stage that should management fail then quality will suffer.



The main spaces are clearly defined, and should be attractive. Again, due to the regimented orientation of the buildings, opportunities for overlooking are reduced. The main space has 4 to 5 properties directly overlooking it, which should provide ample surveillance for this area. The feature space to the south is well addressed by building fronts, but the one to the west is not. This area could become problematic should it fall into disrepair.

The open space to the north east of the corner falls within the cordon sanitaire of the Anglian Water waste water treatment facility, which has the potential to impact on its usability. However, there have been several exercises which monitor the odour from this at receptor sites across proposal development area, and these show that odour levels are well below that which would require any mitigation. It is understood that Anglian Water are supportive of this evidence, and raise no objection to the siting of the play area etc on this part of the site.

A detailed maintenance and management plan that is viable needs to be agreed with the LPA for this question to be scored higher than an 'amber' at this stage.



Strong boundary treatments will help to define what is public and what is private.



The main street will feature landscape such as this, which may be difficult to manage.



Care has been taken in designing the boundary strategy so that it add interest to the street scene.



Feature spaces, if delivered to the same quality as those adjacent, should be valuable public spaces.

12. EXTERNAL STORAGE AND AMENITY SPACE

Is there adequate external storage space for bins and recycling as well as vehicles and cycles?

There are dedicated bin and cycle stores provided for the flats, located across 6 purpose-built structures. There is some concern that these are a little remote from the dwellings they serve, but all are with 30m, which is considered to be an acceptable distance for this use.



For the houses, there is no evidence provided at this stage that bin and cycles stores have been provided. However, the formation of the plots and the access arrangement for these means that people will be able to keep these items in their gardens. On the adjacent development, the design includes cycles stores and should this approach be taken here, then this aspect of the design would be well resolved.

In terms of refuse, there are 16 bin collections points within the layout. What is not shown are dedicated bin stores for the dwellings. Again, should the design reflect the approach taken on the adjacent development, then this should not be a problem. However, until such time that these design details have been resolved, and 'amber' is justified for this question.















Front gardens offer ample and convenient storage.



However, as can be seen above, should stores not be designed in, bins etc can become unsightly.



Results

Question	Score
Integrating into the neighbourhood	
1 Connections	
2 Facilities and services	
3 Public transport	
4 Meeting local housing requirements	
Creating a place	
5 Character	
6 Working with the site and its context	
7 Creating well-defined streets and spaces	
8 Easy to find your way around	
Street and home	
9 Streets for all	
10 Car parking	
11 Public and private spaces	
12 External storage and amenity space	

























Urban Forward's commentary relating to the LPA concerns is found over the page; the two pages (35 & 36) should be read side by side.

Comparing this assessment to that produced by the LPA

In the material supplied to us by the client, the LPA structured their appraisal of the design using the headings and questions from BfL12 (2015).

The conclusions reached by the LPA officer are at odds with our findings, and it is useful to understand why.

The table (right) compares and contrasts the findings and provides commentary on why difference may of been found.

LPA	UF	Main LPA concerns
		Main access is along a non-adopted street, routes cross private land, lack of PROW, many of the streets will not be adopted.
		Existing facilities will be hard to reach, proposed play area too remote, design of public spaces not well resolved.
		No conflict
		Not enough variation in property types. House type distribution too limited.
		Building orientation, lack of active frontages, lack of variation in the street scene, result will be bland.
		The impact of the cordon sanitaire, location of the play area, design doesn't reflect Tidy Road, lack of focal point east-west, SuDS not detailed.
		Activity levels on main streets, car dominance, lack of street hierarchy, front-of-plot parking.
		Few landmarks, no key buildings, lack of Tidy Road 'gateway', use of shared surfaces.
		Shared surfaces not felt to be usable, lack of surveillance.
		Car parking too reliant on one treatment. Dominant within the street scene.
		Lack of maintenance plan, lack of overlooking to play area, lack of detailed design for feature spaces..
		Bike stores for flats too remote. Bin strategy unclear.



Commentary

Many of the comments from LPA under this heading would be better dealt with via other BfL questions. There is a PRoW included within the design. The adoptability of the streets is not an issue with regards this question.

Facilities within the village should be easy to reach if you conclude that the streets are walkable. The play area is easy to reach through the development, including for adjacent residents. The design of public spaces is better dealt with elsewhere.

-

It is true that the building typology used is of large, 'pavilion' style detached buildings, but it is not true that there isn't a variation in both types and tenure of home. Also, dwelling sizes are distributed across the site, not clustered.

The unusual design approach is more likely to create a distinctive neighbourhood than one that lacks character or identity. Uniformity is often what define characterful areas. A lack of 'common threads' erodes rather than supports character.

The location of the play area is best dealt with elsewhere. The issue around the cordon sanitaire is negated by the monitoring. The design of the units etc on Tidy Road is it self not an exemplar to be replicated. There is a focal space on the east-west axis. SuDS are included, and their design is dealt with in the documentation supporting the application.

It is agreed that activity levels on the main street could be an issue. The car parking is better dealt with elsewhere in detail, but it is integrated so will not dominate the street scene. There is a clear street hierarchy. Streets are clearly defined by boundaries etc.

The key landmarks within the sites are building formations and set pieces rather than individual key buildings, which will aid wayfinding. The layout is simple and the street treatments give users a lot of information about the kind of route they are on. A gateway from Tidy Road would have been a useful design feature.

There is no reason to think that the lanes and shared surfaces within this development will not be usable, as the projected traffic volumes are very low. The lack of overlooking is acknowledged as an issue.

Usually this would be a key issue, but the specifics of this design - especially the generosity of landscaping - means that this isn't likely to cause problems. Cars are well integrated into the plots and streets.

The maintenance plan is included in the Planning Statement, but would benefit from more detail. The play area is overlooked by a number of properties. The feature spaces should be well designed, but lack detail at the moment.

There is ample opportunity for bin and bike storage across the site, but the proposal lacks detail. The bike stores for the flats are acceptably located. Bin stores are intended for the houses but these need to be better shown. There are 16 bin collection points.

Conclusions

From an independent perspective, it appears that the the LPA have resorted to using Building for Life at a late stage, having not referenced it during two round of pre-application advice or during the previous planning application. Bearing in mind the Council's new local plan extols the virtues of BfL this is unfortunate. Early round table discussion using BfL as a discussion tool could have allowed the LPA to better understand the design principles of this scheme.

The main issues that could have potentially been resolved through dialogue include:

- Key principles around addressing frontages and how streets and laid out.
- The amenity and parking standards across the site, including how this overlooked and accessed.
- Active frontages on the key character-forming aspects of the main streets, notwithstanding the adjustments needed to make the layout remain true to the principles of the layout.
- The way housing mix and housing types and styles have been designed, and the kinds of place and community this will create.

In conclusion, the design proposed adequately balances retaining site assets, responding to edge conditions, and providing an efficient use of developable land. Any design requires trade-offs between following established principles and being responsive to the needs of the locality, and here the design team have done an admirable job in finding the right balance. Whilst there are improvements that could be made to this scheme, it is our view that the resultant quality of place of this design will be a positive addition to Rendlesham.

About us

This report was produced by Garry Hall. He is a qualified urban designer and hold a BSc (Hons) in Environmental Design and Environmental Policy from Oxford Brookes University and an MSc Spatial Planning with Urban Design specialization (with merit) also from Oxford Brookes University. He has been Executive Director of urban forward ltd since the company's launch in 2011, and prior to this has held roles relating to the built environment since 2005.

Previous roles and activities relevant to this scheme include his time as part of Oxford City Council's Planning Policy Team, and his current positions on the Opun Design Review East Midlands expert panel and the Berkshire, Oxfordshire, Buckinghamshire and Milton Keynes Design Review expert panel. He is Chief Executive of TransForm Places Ltd, a not-for-profit organization established by Government to offer impartial design advice and related services to ensure quality new housing. He is also Urban Design manager for Opun, the architecture charity, and also work as consultant with the MADE West Midlands design centre and Design South East, the design centre based in Kent.

Garry is involved in the development of national best practice for urban design and produced the latest version of Building for Life 12, the Government-endorsed standard for well-designed residential environments. This work was undertaken on behalf of the Build for Life Partnership comprised of Design for Homes, the Homebuilders Federation and Cabe at the Design Council. Previously, he lead on the dissemination of the now-superseded Building for Life 20, and also ran the national training program for Manual for Streets 2. He is in the process of adapting BfL12 for use by the Welsh Assembly. He also sits on the expert panel that assesses schemes wishing to attain the Built for Life quality assurance mark.

Garry was a part-time lecturer at Northampton University on their Integrated Urbansim MSc course, and taught on their urban design summer school in 2014 and 2015. He regularly speak at urban design events and deliver urban design training, and clients include the Homes and Communities Agency, ATLAS, various Local Authorities, and home builders such as Barratt Homes, for whom Garry recently delivered a program of in-house events relating to design quality in new developments. The majority of his previous projects relate to large-scale urban extensions, design codes, masterplans, townscape analysis, and Space Syntax urban structure analysis.

urban forward ltd is a multidisciplinary planning, design and urban design consultancy dedicated to quality outcomes for the built environment. We offer a comprehensive range of services designed to deliver the best possible results for any project, from new developments to policy and research. Our team are leaders in the field, with a wealth of practical experience to help you realise the potential of your project. We work with both private and public sector clients as well as with community groups and those in the third sector.

urban forward ltd
37 New Road
Great Baddow
Essex CM2 7QT

w: www.urbanforward.co.uk
e: info@urbanforward.co.uk
t: +44 7980 743523
 @urbanforward



urban forward ltd

Appendix X v

Reference	C/03/2362
Application Received	Tue 12 Aug 2003
Application Validated	Thu 11 Dec 2003
Address	Area 5 Sycamore Drive Rendlesham Woodbridge Suffolk
Proposal	Erection of residential development of 50 houses & apartments
Status	Permitted
Decision	Application Permitted
Decision Issued Date	Thu 21 Oct 2004
Appeal Status	Unknown
Appeal Decision	Not Available

Suffolk Coastal District Council

Melton Hill, Woodbridge, Suffolk IP12 1AU
Tel: (01394) 383789
Fax: (01394) 385100
Minicom: (01394) 444211
DX: Woodbridge 41400
Website: www.suffolkcoastal.gov.uk



John Renwick
MSV Homes Ltd
10 Ansdell Street
LONDON
W8 5BN

Application: C03/2362

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Please record in the
Register of Local Land
Charges

PLANNING PERMISSION

Town/Parish: Rendlesham
Date of Application: 08 December 2003
Applicant: John Renwick

Application No. C03/2362

RECEIVED BY
LOCAL LAND CHARGES
01 NOV 2004

Proposal: Erection of residential development of 50 houses & apartments

Location: Area 5 Sycamore Drive Rendlesham Woodbridge Suffolk

Permission is hereby granted by the **SUFFOLK COASTAL DISTRICT COUNCIL** as local planning authority for the purposes of the **TOWN AND COUNTRY PLANNING ACT 1990** for development in accordance with the application shown above, subject to the development being carried out in accordance with the plan(s) and information contained in the application, and to the following conditions and reasons:

APPROVED PLANS:

Site Location Plan received 08/12/03
Site Plan Ref RS/SL Rev.A received 14/10/04
0011077/015 - Site Layout Plan received 16/07/04
Tree Report for W J Berry & Son dated 08/03/04
R5/J/P/A1 - 1 & 2 Bed Apartment received 08/12/03
R5/EZ/P Rev B - 2 Bed House received 11/02/04
R5/DZ/P Rev F - 3 bed House received 11/02/04
R5/CS3/P Rev F - 3 - 4 Bed House received 11/02/04
R5/C3/P Rev - 4 Bed House received 02/03/04
R5/B2/P Rev - 5 bed House received 02/03/04.

CONDITIONS AND REASONS:

- 1 The development hereby permitted shall be begun not later than the expiration of five years from the date of this permission.

contd



INVESTOR IN PEOPLE

Suffolk Coastal...where quality of life counts

Reason: This condition is imposed in accordance with Section 91 of the Town and Country Planning Act 1990.

- 2 No development shall commence elsewhere on site until details of the estate roads and footpaths, including layout, gradients, surfacing and means of surface water drainage have been submitted to and approved in writing by the local planning authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

- 3 No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least base course level or better, in accordance with the approved details except with the written agreement of the local planning authority.

Reason: To ensure that satisfactory access is provided.

- 4 Before the development herein approved is occupied, all areas to be used by vehicles shall be properly laid out, drained and surfaced in accordance with a scheme which shall previously have been submitted to and approved in writing by the local planning authority. The approved scheme shall thereafter be retained in the approved form unless otherwise agreed in writing with the local planning authority.

Reason: To provide satisfactory accommodation for vehicles within the site in the interests of highway safety and amenity.

- 5 No development shall take place within the area of the application site, until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which shall have been submitted to the local planning authority for approval in writing.

Reason: To ensure the proper recording of archaeological artifacts.

- 6 No development shall commence or any materials, plant or machinery be brought on to the site until, full details showing the position of fencing to protect all trees and hedgerow(s), shown to be retained on the approved plan, have been submitted to and approved in writing by the local planning authority. The protective fencing shall be 1.2m cleft chestnut, complying with BS.5837, and shown to be erected 1 metre beyond the canopy spread of the trees and hedgerow(s) unless otherwise agreed in writing by the local planning authority.

Reason: To protect the trees/hedgerow during the course of development in the interest of visual amenity.

- 7 No development shall commence or any materials, plant or machinery be brought on to the site until, the approved scheme of protective fencing has been implemented. At no time during the development shall there be any materials, plant or equipment stored, or building or excavation works of any kind, undertaken beneath the canopies of the trees and hedges. All fencing shall be retained and maintained until the development is complete.

Reason: To protect the trees/hedgerow during the course of development in the interest of visual amenity.

- 8 No development shall commence until precise details of a scheme of plot landscaping and amenity space landscaping (which term shall include tree and shrub planting, grass, earthworks and other operations as appropriate) at a scale not less than 1:200 shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure that there is a well laid out landscaping scheme in the interest of visual amenity.

- 9 The approved scheme of plot landscaping and amenity space landscaping shall be implemented not later than the first planting season following commencement of the development (or within such extended period as the local planning authority may allow) and shall thereafter be retained and maintained for a period of five years. Any plant material removed, dying or becoming seriously damaged or diseased within five years of

planting shall be replaced within the first available planting season thereafter and shall be retained and maintained.

Reason: To ensure that there is a well laid out landscaping scheme in the interest of visual amenity.

- 10 Before work on the development is commenced precise details of any gate, wall, fence or other means of linking or boundary feature to be erected on the site shall be submitted to and approved by the Council. The approved means of enclosure shall be erected prior to the occupation of the dwellings to which they relate, to the Council's reasonable satisfaction.

Reason: In the interests of amenity: the application did not include the necessary details for consideration.

- 11 None of the trees or hedges shown to be retained on the approved plan and indicated within the approved Tree Survey, shall be lopped, topped, uprooted, felled, wilfully damaged or in any other way destroyed or removed without the prior written consent of the local planning authority. Any trees or hedges removed, dying, being severely damaged or becoming seriously diseased within five years of the completion of the development shall be replaced during the first available planting season with trees or hedges of a size and species which shall previously have been agreed in writing by the local planning authority.

Reason: To safeguard the contribution to the character of the locality provided by the trees/hedgerow.

Informatives

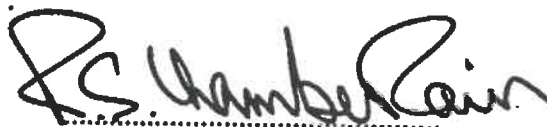
1. The permission is subject to a S106 Legal Agreement to secure educational funding dated 13th October 2004.
2. The contamination issues on site have been "validated" as "suitable for use" by the Council's Head of Health by letter dated 05/08/04.
3. The Condition requiring Archaeological evaluation reflects Condition 36 on the Outline Planning Consent for this area.

Summary of reasons for approval:

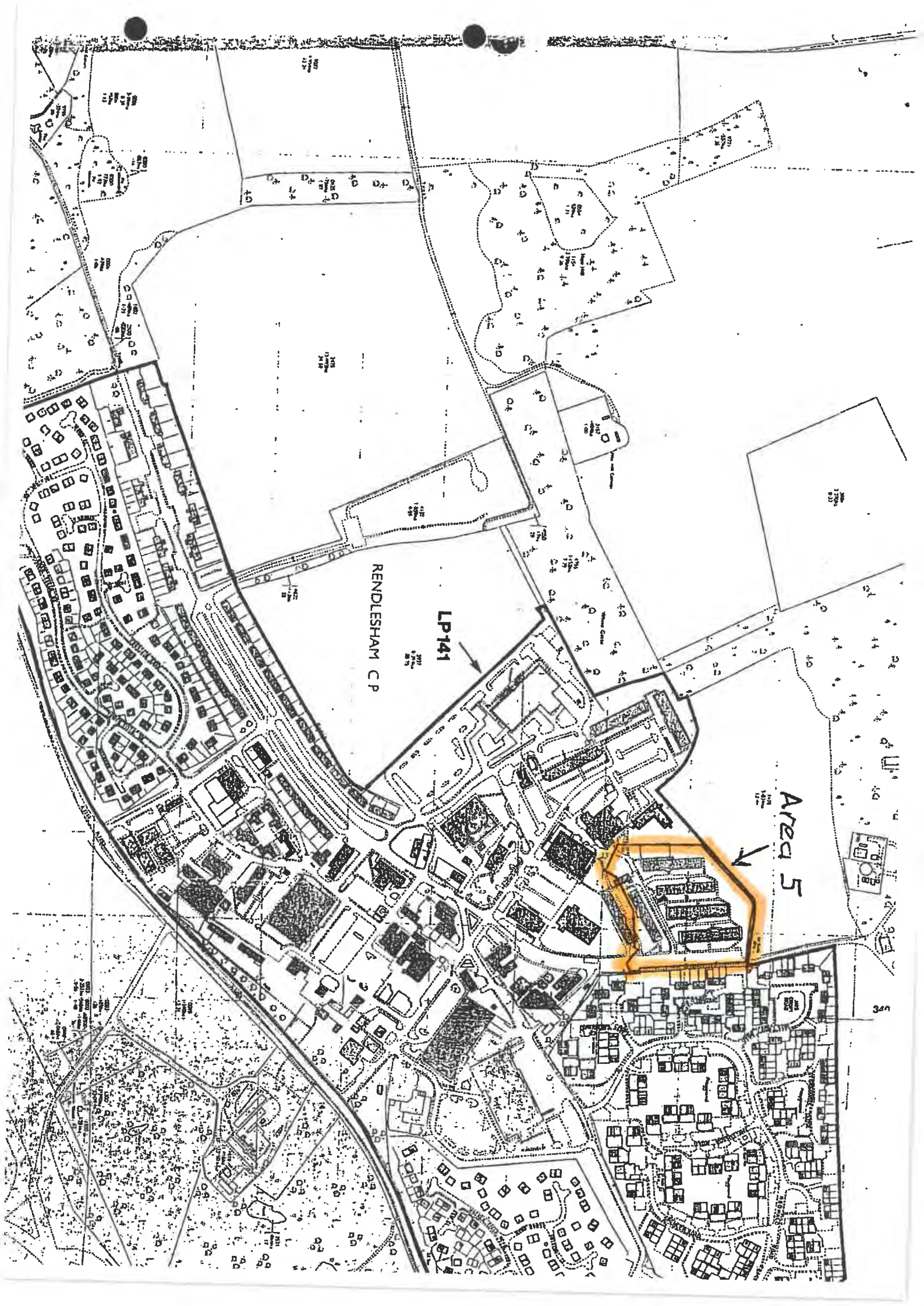
In determining this application the local planning authority had regard to the development plan policies set out below (together with relevant Supplementary Planning Guidance) and other material planning considerations. It concluded that the development proposed accorded with the provisions of the development plan and did not result in demonstrable harm to interests of acknowledged importance.

Local Plan Policies **AP160, AP36 & AP19.**

DATE: 15th October 2004

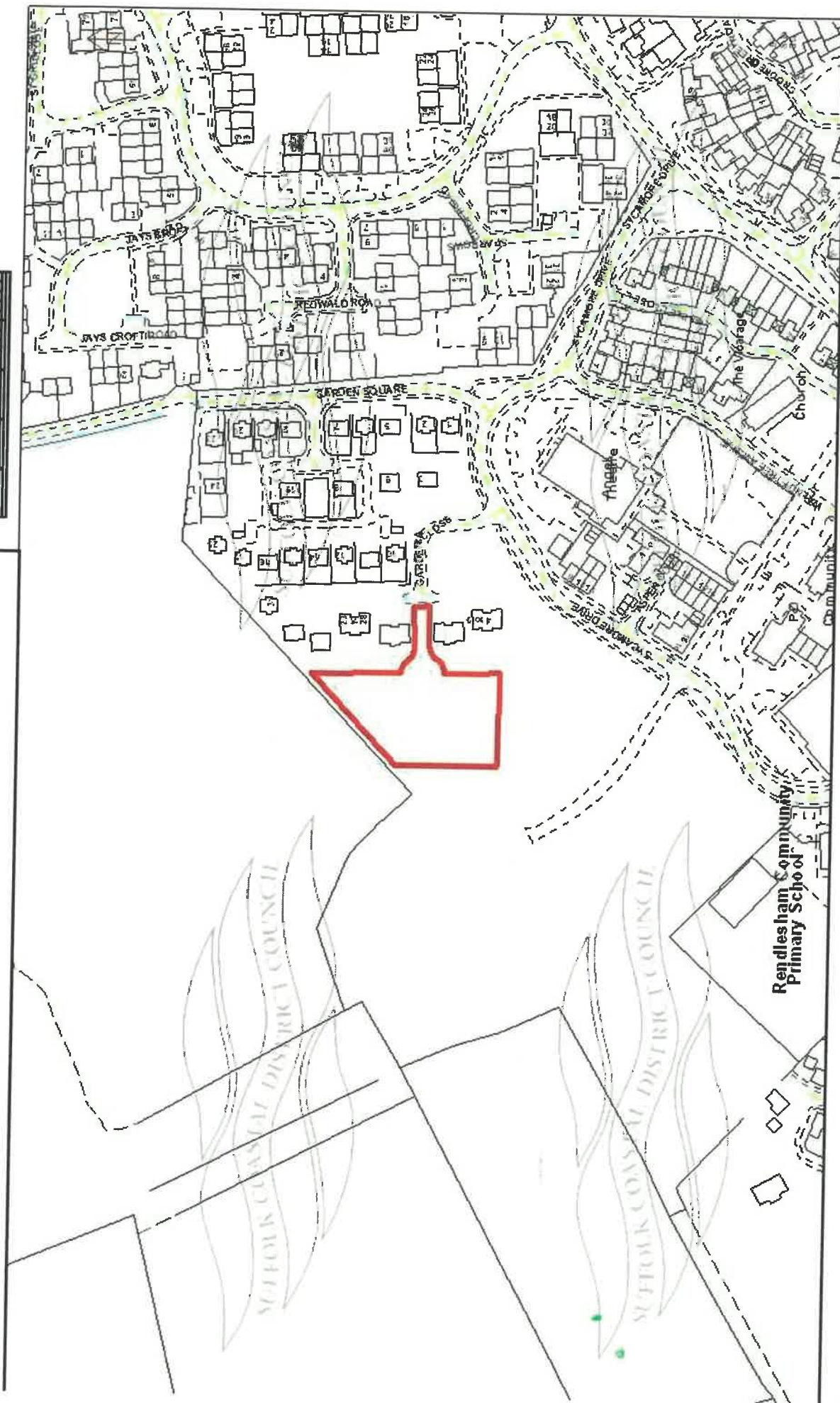


R S Chamberlain
Head of Development & Building Control



Reference	C/08/0226
Application Received	Fri 25 Jan 2008
Application Validated	Thu 31 Jan 2008
Address	Land West Of Gardenia Close Area 6 Sycamore Drive Rendlesham
Proposal	Erection of residential Education Centre & 2 No. dwellings
Status	Permitted
Decision	Application Permitted
Decision Issued Date	Wed 30 Apr 2008
Appeal Status	Unknown
Appeal Decision	Not Available

0 25 50 75 100 125 m



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Suffolk Coastal District Council 1000198 84, 2008.



PLANNING PERMISSION

Town and Country Planning Act 1990

Correspondence Address:

MSV Homes Ltd
C/O 20 Garden Square
Rendlesham
Suffolk
IP12 2GW

Applicant: MSV Homes Ltd

Date Received: 31 January 2008

Application No: C08/0226

Date Valid: 31 January 2008

Particulars and location of development:

Erection of residential Education Centre & 2 No. dwellings
LAND WEST OF GARDENIA CLOSE, AREA 6, SYCAMORE DRIVE, RENDLESHAM

Suffolk Coastal District Council hereby give notice in pursuance of the provisions of the Town and Country Planning Act 1990 that **permission has been granted** for the development referred to above in accordance with the application and plans submitted subject to the following conditions:

Approved Plans: PP803/N/SL/P - Site Layout

PP711/1/AS/P Rev A - Site Sections

PP711/1/SN/P Rev B - Typical Sections

PP711/1/GF/P Rev A, PP711/1/FF/P Rev A & PP711/1/SF/P Rev A - Floor Plans of Education Centre

PP711/1/EW/P Rev C, PP711/1/EN/P Rev B, PP711/1/EE/P Rev C, PP711/1/ES/P Rev B - Elevations of Education Centre

RS/D2/P31/P32/AF/P - House Type Plans

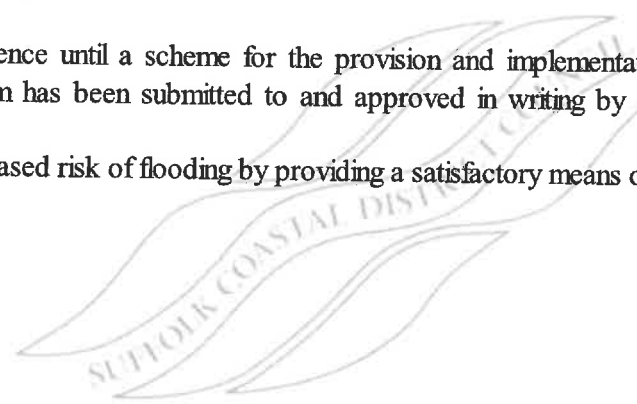
RS/G/AE/TGPA6 - Garages for Educational Centre

1. The development hereby permitted shall be begun not later than the expiration of three years from the date of this permission.

Reason: This condition is imposed in accordance with Section 91 of the Town and Country Planning Act 1990 (as amended).

2. No development shall commence until a scheme for the provision and implementation of a surface water drainage system has been submitted to and approved in writing by the local planning authority.

Reason: To prevent the increased risk of flooding by providing a satisfactory means of surface water disposal.



3. No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least base course level or better, in accordance with the approved details except with the written agreement of the local planning authority.
Reason: To ensure that satisfactory access is provided for the safety of residents and the public.
4. The use shall not commence until the area(s) within the site shown on Drawing No PP803/1/SL/P for the purpose of loading, unloading, manoeuvring and parking of vehicles has been provided. Thereafter the area(s) shall be retained and used for no other purpose.
Reason: To ensure that sufficient space for the on site parking of vehicles is provided and maintained in order to ensure the provision of adequate on-site space for the parking and manoeuvring of vehicles where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.
5. None of the trees or hedges shown to be retained on the approved plan shall be lopped, topped, pruned, uprooted, felled, wilfully damaged or in any other way destroyed or removed without the prior written consent of the local planning authority. Any trees or hedges removed, dying, being severely damaged or becoming seriously diseased within five years of the completion of the development shall be replaced during the first available planting season, with trees or hedges of a size and species, which shall previously have been agreed in writing by the local planning authority.
Reason: To safeguard the contribution to the character of the locality provided by the trees and hedgerow.
6. No development shall commence or any materials, plant or machinery be brought on to the site until, full details showing the position of fencing to protect all trees and hedgerow(s), shown to be retained on the approved plan, have been submitted to and approved in writing by the local planning authority. The protective fencing shall be 1.2m cleft chestnut, complying with BS.5837, and shown to be erected 1 metre beyond the canopy spread of the trees and hedgerow(s) unless otherwise agreed in writing by the local planning authority.
Reason: To protect the trees/hedgerow during the course of development in the interest of visual amenity.
7. No development shall commence or any materials, plant or machinery be brought on to the site, until the approved scheme of protective fencing has been implemented. At no time during the development shall there be any materials, plant or equipment stored, or building or excavation works of any kind undertaken, beneath the canopies of the trees and hedges. All fencing shall be retained and maintained until the development is complete.
Reason: To protect the trees/hedgerow during the course of development in the interest of visual amenity.
8. No development shall commence until precise details of a scheme of landscape works (which term shall include tree and shrub planting, grass, earthworks and other operations as appropriate) at a scale not less than 1:200 shall be submitted to and approved in writing by the local planning authority.
Reason: To ensure that there is a well laid out landscaping scheme in the interest of visual amenity.

9. No development shall commence until precise details of a scheme of hard landscape works, (which term shall include driveway construction, parking areas patios, hard surfaces etc, and other operations as appropriate), at a scale not less than 1:200 has been submitted to and approved in writing by the local planning authority.

Reason: To ensure that there is a well laid out landscaping scheme in the interest of visual amenity.

10. The approved scheme of landscape works shall be implemented not later than the first planting season following commencement of the development (or within such extended period as the local planning authority may allow) and shall thereafter be retained and maintained for a period of five years. Any plant material removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter and shall be retained and maintained.

Reason: To ensure that there is a well laid out landscaping scheme in the interest of visual amenity

11. No development shall commence until details of the roof and wall materials to be used, have been submitted to and approved in writing by the local planning authority.

Reason: To ensure the satisfactory appearance of the development in the interest of visual amenity.

12. The storage of refuse outside the building shall fully accord with a scheme which shall have been submitted to and approved in writing by the local planning authority, before the use is commenced.

Reason: In the interests of amenity and the protection of the local environment.

13. No development shall commence until a scheme for the provision of fire hydrants within the development has been submitted and agreed in writing with the Local Planning Authority, and no part of the development shall be occupied until the agreed scheme has been implemented in full.

Reason: In order to ensure adequate supplies of water for fire fighting.

14. All windows on the south elevations of the proposed house at first floor level or above shall be fitted and remain fitted with patterned/obscure glass, details of which shall be submitted to and approved in writing by the local planning authority before the glazing is installed.

Reason: To avoid overlooking of properties to the south

15. The working hours for the Education Centre shall not be other than between 0800 hours and 2200 hours only, unless otherwise agreed by the local planning authority.

Reason: In the interests of amenity and the protection of the local environment

16. Before the installation of any extract ventilation system, refrigeration equipment, and any other fixed plant, details of the equipment, its location, acoustic housing and any vibration isolation measures, together with the projected noise levels at the boundary of the property, shall be submitted to the local planning authority and only approved plant shall be installed and retained in the approved form thereafter.

Reason: In the interests of amenity and the protection of the local environment.

17. Deliveries to and collections from the premises shall only take place during the following hours:-

Monday to Friday	0800 until 1800 hours
Saturdays	0800 until 1300 hours
Sundays & Banks Holidays	None

Unless otherwise agreed in writing with the local planning authority.

Reason: In the interests of amenity and the protection of the local environment.

18. Retail sales in association with the use of the Education Centre shall be limited to the room labelled "shop" on Drawing No PP711/1/GF/P Rev A and shall, in any event, have a maximum floorspace of 50 sq.m. gross internal.

Reason: The site has inadequate servicing access and car parking to serve anything other than an ancillary shop. A larger shop might have an adverse impact upon the vitality and viability of the village centre.

19. The premises herein referred to, shall be used for residential education centre and for no other purpose (including any other purpose in Class C2 of the Schedule to the Town and Country Planning [Use Classes] Order 2005).

Reason: In order that the local planning authority may retain control over this development/site in the interests of amenity and the protection of the local environment.

20. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 or any Order revoking or re-enacting the said Order] no development of any kind specified in Part 1 Classes A, B, C, D, E, F, G, and H of Schedule 2 of the said Order shall be carried out unless otherwise agreed in writing with the local planning authority.

Reason: In order that the local planning authority may retain control over this particular form of development in the interests of amenity and the protection of the local environment.

Notes to Applicant:

1. In determining this application the local planning authority has had regard to the following Policies of the Local Plan: AP19, AP26, AP80, AP160.
2. This planning permission contains condition precedent matters that must be discharged before the development approved is commenced, or any activities that are directly associated with it. If development commences without compliance with the relevant condition(s) you will not be able to implement the planning permission & your development will be deemed unauthorised. An application under Section 73 of the Town & Country Planning Act 1990 will be required to amend the relevant condition(s) before development continues. You are strongly recommended to comply with all conditions that require action before the commencement of development.
3. The applicant is advised that the proposed development is likely to require the naming of new street(s) and numbering of new properties/businesses within those streets and/or the numbering of new properties/businesses within an existing street. You should contact the Property Information Team (01394 444261), which is responsible on

behalf of the Council for the statutory street naming and numbering function.

C08/0226



Mulley

P J Ridley
Head of Planning Services

Date: 30 April 2008



DC/14/1605/FUL | Erection of four apartments (alternative scheme to previous approval for two dwellings (C/08/0226) and subsequent approval for two health spa buildings (DC/13/3519/FUL)) | Part Of Land West Of Gardenia Close Sycamore Drive Rendlesham Suffolk

Reference	DC/14/1605/FUL
Application Received	Mon 19 May 2014
Application Validated	Mon 19 May 2014
Address	Part Of Land West Of Gardenia Close Sycamore Drive Rendlesham Suffolk
Proposal	Erection of four apartments (alternative scheme to previous approval for two dwellings (C/08/0226) and subsequent approval for two health spa buildings (DC/13/3519/FUL))
Status	Permitted
Decision	Application Permitted
Decision Issued Date	Mon 14 Jul 2014
Appeal Status	Unknown
Appeal Decision	Not Available



Report for Delegated Planning Application

LOCATION

Part Of Land West Of Gardenia
Close
Sycamore Drive
Rendlesham
Suffolk

PROPOSAL:

Erection of four apartments (alternative scheme to previous approval for two dwellings (C/08/0226) and subsequent approval for two health spa buildings (DC/13/3519/FUL))

APPLICATION REF:

DC/14/1605/FUL

APPLICATION TYPE:

Full Application

APPLICANT:

Maharishi Foundation

EXPIRY DATE:

13 July 2014

PARISH:

Rendlesham

WARD:

Rendlesham

PLANNING POLICY

AP160 - Rendlesham (Former Domestic Base): Creation of a New Community Suffolk Coastal Local Plan Policies (Adopted 1994) (incorporating first and second alterations Adopted 2001 & March 2006)

SP1 Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP1A Presumption in Favour of Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM22 Design: Function (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM21 Design: Aesthetics (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM23 Residential Amenity (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

NEWSPAPER ADVERTISEMENTS

None

SITE NOTICES

The following site notices have been displayed:

General Site Notice

Reason for site notice: General Site Notice,
Date posted: 23/06/14
Expiry date: 13/07/14

CONSULTATIONS

Consultee (summarized comments)	Date consulted	Date replied
Suffolk County - Highways Department	12/06/14	03/07/14
Comments:		
SCDC Environmental Protection	12/06/14	20/06/14
Comments:		
SCDC Housing Enabling Officer	12/06/14	No reply received.
Parish Council	12/06/14	No reply received.

NEIGHBOUR COMMENTS

Number of properties originally consulted: **17**
 Number of contributors: **0**

No. of Objections: **0**
 Letters of Support: **0**
 Other representations: **0**

9 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

8 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

7 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

6 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

5 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

4 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

15 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

14 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

12 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

10 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

11 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

71 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

73 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

75 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

77 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

79 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

81 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

CASE OFFICER ASSESSMENT

Recommendation: Application Permitted

Conditions/Reason for Refusal:

1. The development hereby permitted shall be begun within a period of three years beginning with the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 as amended.

2. The development hereby permitted shall not be brought into use until it has been completed in all respects strictly in accordance with Drawing No's. RS/5/B11/SL/P rev. C, RS/5/B11/SP/P rev. D, RS/5/B11/AE/P rev. B; received 11/07/14 and 19/05/14;, for which

permission is hereby granted or which are subsequently submitted to and approved in writing by the Local Planning Authority and in compliance with any conditions imposed by the Local Planning Authority.

Reason: To secure a properly planned development.

3. No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least base course level or better, in accordance with the approved details except with the written agreement of the local planning authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

4. The use shall not commence until the area(s) within the site shown on Drawing No. RS/5/B11/SP/P rev D. for the purpose of loading, unloading, manoeuvring and parking of vehicles has been provided. Thereafter the area(s) shall be retained and used for no other purpose.

Reason: To ensure that sufficient space for the on site parking of vehicles is provided and maintained in order to ensure the provision of adequate on-site space for the parking and manoeuvring of vehicles where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.

5. No development shall commence until precise details of a scheme of landscape works (which term shall include tree and shrub planting, grass, earthworks and other operations as appropriate) at a scale not less than 1:200 shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure that there is a well laid out landscaping scheme in the interest of visual amenity.

6. The approved scheme of landscape works shall be implemented not later than the first planting season following commencement of the development (or within such extended period as the local planning authority may allow) and shall thereafter be retained and maintained for a period of five years. Any plant material removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter and shall be retained and maintained.

Reason: To ensure that there is a well laid out landscaping scheme in the interest of visual amenity.

7. No development shall commence until details of the roof and wall materials to be used, have been submitted to and approved in writing by the local planning authority.

Reason: To ensure the satisfactory appearance of the development in the interest of visual amenity.

8. The first floor windows on the south elevations of the proposed apartments shall be fitted and remain fitted with obscure glass and shall be non opening, details of the glazing shall be submitted to and approved in writing by the local planning authority before the glazing is installed.

Reason: To avoid overlooking of properties to the south

9. Prior to the commencement of development details of covered secure cycle storage for the apartments shall be submitted and agreed by the Local Planning Authority. The cycle storage shall be provided prior to the occupation of any of the apartments hereby approved.

Reason: In the interests of facilitating sustainable methods of transport.

Informatives:

1. The applicant is advised that the proposed development may require the naming of new street(s) and numbering of new properties/businesses within those streets and/or the numbering of new properties/businesses within an existing street. You should contact the Property Information Team (01394) 444261, which is responsible on behalf of the Council for the statutory street naming and numbering function.

Case Officer Report

This application relates to a site off Gardenia Close located to the north-west of the village centre at Rendlesham. The site is owned by The Maharishi Foundation who also developed the adjacent housing which is largely occupied by their members. This is a unique community development with long term goals to incorporate both housing and an education facility designed in line with their beliefs and principles.

The site is abutted to the east by apartments in Gardenia Close, to the south and west by modern housing, and to the north by arable land within the physical limits boundary of the village. Situated upon the site is a small copse of trees towards the northern boundary and several individual trees both at the site entrance and on the north-west boundary. Other than this the site is currently vacant and formed a part of Area 5 at Rendlesham for which there was an original allocation of housing units, not all of which have been taken up.

The wider site has permission to erect an Educational Centre having an approximate size of 36 metres x 22 metres and being 2-storeys in height with potential provision for rooms in the roof. Previously permission has been granted on the application site for the erection of two 2½-storey dwellings. Subsequently the proposal was altered and permission was instead granted for two spa buildings of a matching design for use in association with the education centre. The applicants have now reconsidered the proposal for the two buildings and have a need to raise more funds for the education centre, therefore this proposal seeks permission for the two buildings as 4 apartments.

Policy AP160 of the Local Plan outlines the need for a comprehensive master plan for the development of Rendlesham and gives a maximum number of dwellings appropriate to the settlement. The two dwellings previously approved and the alternative of four apartments herein applied for sit within the original Area 5 allocation and in principle are acceptable. Having researched the situation on this site regarding the provision of affordable housing and payment of playspace contributions, these were encapsulated within the original outline permission (C/96/1422) and the allocated housing numbers for this area. As the site remains undeveloped and the proposal is not a separate later form of development it is not necessary for affordable housing or a playspace contribution to be included in this application.

The design of the buildings remains much the same as previous approvals and their subdivision into apartments would appear a viable option. Only the south elevation windows would be obscure glazed and fixed at first floor to protect the privacy of the neighbours to the south. The form and scale of the buildings would be no different in effect than the previously approved schemes.

Parking was originally proposed at 1 space per apartment though Highways requested 2 spaces per apartment. Adopted standards would require 1.5 spaces per unit and a similar amount of parking has been approved at other village centre apartment sites. The applicant has therefore amended the application to provide 6 spaces amounting to 1.5 spaces per unit. Considering the location and the potential for some overflow parking at the education centre out of hours, the proposed parking provision is acceptable. The access previously approved and implemented for the education building is capable of accommodating traffic for four apartments. Bin storage is shown as external which should be acceptable, however no covered cycle storage is shown. Details of such a storage facility should be provided under a condition.

In conclusion the proposal makes an efficient use of the site for further housing which would not materially alter the appearance of the approved development and the amount of housing would remain within the outline numbers originally approved for this area.

CASE OFFICER: Ben Woolnough, Senior Planning and Enforcement Officer, (01394) 444733

AUTHORISING OFFICER: Patsy Dobson, Team Leader (Central Area)



PLANNING PERMISSION

TOWN AND COUNTRY PLANNING ACT 1990 TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) ORDER 2010

DC/14/1605/FUL

Agent

Mr John Renwick
29 Gardenia Close
Rendlesham
Suffolk
IP12 2GX

Applicant

Maharishi Foundation
1 Garden Square
Rendlesham
Suffolk
IP12 2GW

Parish

Rendlesham

Date Valid

19th May 2014

Proposal:

Erection of four apartments (alternative scheme to previous approval for two dwellings (C/08/0226) and subsequent approval for two health spa buildings (DC/13/3519/FUL))

Site:

Part Of Land West Of Gardenia Close, Sycamore Drive, Rendlesham

PERMISSION IS HEREBY GRANTED by **SUFFOLK COASTAL DISTRICT COUNCIL** as Local Planning Authority for the purposes of the **TOWN AND COUNTRY PLANNING ACT 1990**, for development in complete accordance with the application shown above, the plan(s) and information contained in the application, and subject to compliance with the following conditions as set out below. Your further attention is drawn to any informatives that may have been included.

In determining the application, the Council has given due weight to all material planning considerations including policies within the development plan as follows:

AP160 - Rendlesham (Former Domestic Base): Creation of a New Community Suffolk Coastal Local Plan Policies (Adopted 1994) (incorporating first and second alterations Adopted 2001 & March 2006)

SP1 Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP1A Presumption in Favour of Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM22 Design: Function (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM21 Design: Aesthetics (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM23 Residential Amenity (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

Conditions:

1. The development hereby permitted shall be begun within a period of three years beginning with the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 as amended.

2. The development hereby permitted shall not be brought into use until it has been completed in all respects strictly in accordance with Drawing No's. RS/5/B11/SL/P rev. C, RS/5/B11/SP/P rev. D, RS/5/B11/AE/P rev. B; received 11/07/14 and 19/05/14; for which permission is hereby granted or which are subsequently submitted to and approved in writing by the Local Planning Authority and in compliance with any conditions imposed by the Local Planning Authority.

Reason: To secure a properly planned development.

3. No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least base course level or better, in accordance with the approved details except with the written agreement of the local planning authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

4. The use shall not commence until the area(s) within the site shown on Drawing No. RS/5/B11/SP/P rev D. for the purpose of loading, unloading, manoeuvring and parking of vehicles has been provided. Thereafter the area(s) shall be retained and used for no other purpose.

Reason: To ensure that sufficient space for the on site parking of vehicles is provided and maintained in order to ensure the provision of adequate on-site space for the parking and manoeuvring of vehicles where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.

5. No development shall commence until precise details of a scheme of landscape works (which term shall include tree and shrub planting, grass, earthworks and other operations as appropriate) at a scale not less than 1:200 shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure that there is a well laid out landscaping scheme in the interest of visual amenity.

6. The approved scheme of landscape works shall be implemented not later than the first planting season following commencement of the development (or within such extended period as the local planning authority may allow) and shall thereafter be retained and maintained for a period of five years. Any plant material removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter and shall be retained and maintained.

Reason: To ensure that there is a well laid out landscaping scheme in the interest of visual amenity.

7. No development shall commence until details of the roof and wall materials to be used, have been submitted to and approved in writing by the local planning authority.

Reason: To ensure the satisfactory appearance of the development in the interest of visual amenity.

8. The first floor windows on the south elevations of the proposed apartments shall be fitted and remain fitted with obscure glass and shall be non opening, details of the glazing shall be submitted to and approved in writing by the local planning authority before the glazing is installed.

Reason: To avoid overlooking of properties to the south

9. Prior to the commencement of development details of covered secure cycle storage for the apartments shall be submitted and agreed by the Local Planning Authority. The cycle storage shall be provided prior to the occupation of any of the apartments hereby approved.

Reason: In the interests of facilitating sustainable methods of transport.

Informatives:

1. The applicant is advised that the proposed development may require the naming of new street(s) and numbering of new properties/businesses within those streets and/or the numbering of new properties/businesses within an existing street. You should contact the Property Information Team (01394) 444261, which is responsible on behalf of the Council for the statutory street naming and numbering function.



Head of Planning Services

Date: 14th July 2014

PLEASE READ NOTES BELOW

Note

Most work, including change of use, has to comply with Building Regulations. Have you made an application or given notice before work is commenced?

Note

1. If the applicant is aggrieved by the decision of the Local Planning Authority to refuse permission or consent, or to grant permission or consent subject to conditions, he may appeal to the First Secretary of State. The applicant's right to appeal is in accordance with the appropriate statutory provisions which follow:

Planning applications: Sections 78 and 79 Town & Country Planning Act 1990

Listed Building applications: Section 20, 21 and 22 Planning (Listed Buildings and Conservation Areas) Act 1990.

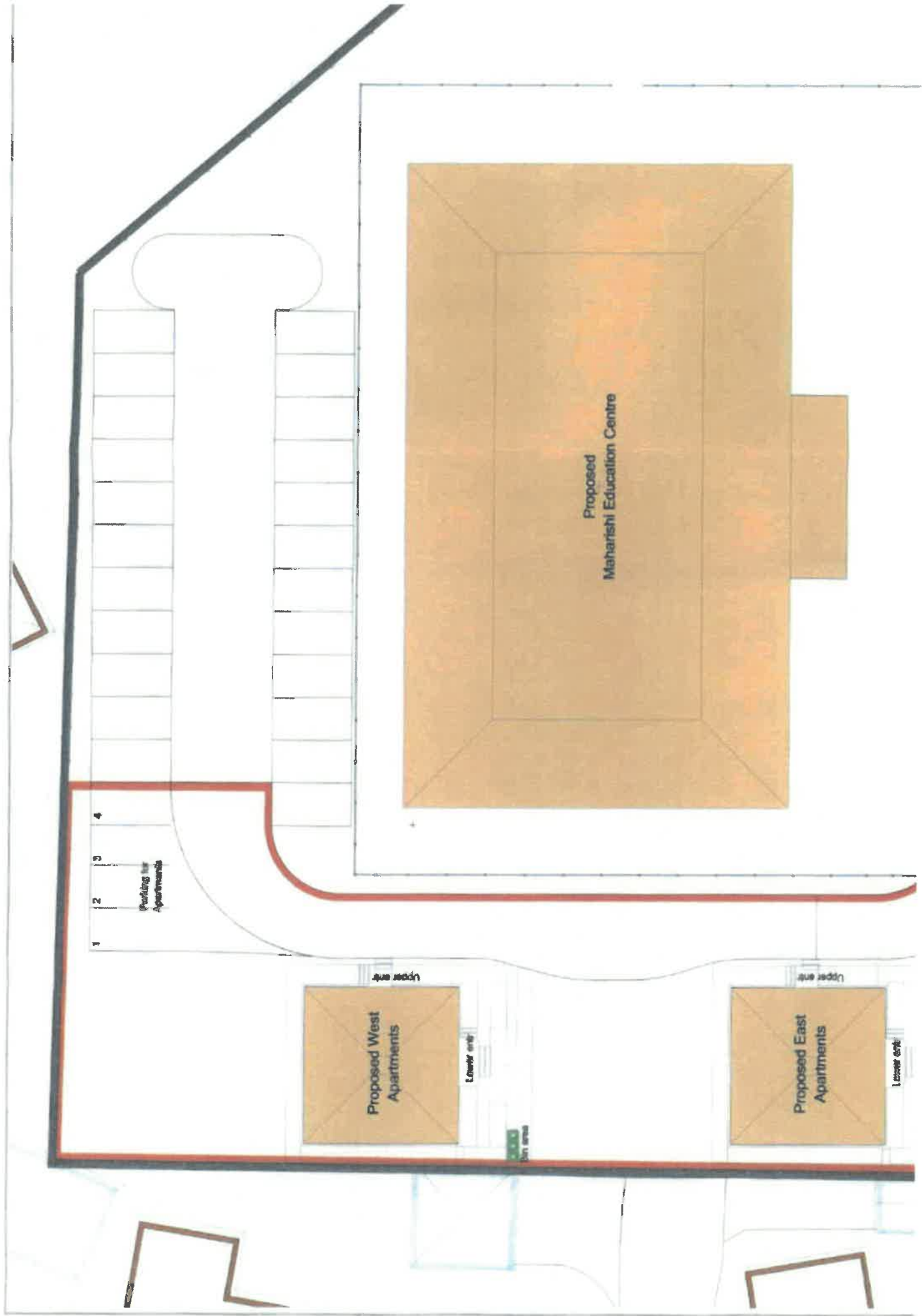
Advertisement applications: Section 220 and 221, Town and Country Planning Act 1990 Regulation 15 Town & Country Planning (Control of Advertisements) Regulations 1989.

2. **Notice of appeal** in the case of applications for advertisement consent must be served within **two months** of the date of this notice. Householder planning applications must be served within **twelve weeks** of the date of this notice. In all other cases, notice of appeal must be served within **six months** of the date of this notice. Appeals must be made on a form which is obtainable from The Planning Inspectorate, Registry/Scanning Room, 3/05 Kite Wing, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN; or online at <http://www.planningportal.gov.uk/planning/appeals/>. The Planning Inspectorate website can be viewed at <http://www.planning-inspectorate.gov.uk/>.

3. The First Secretary of State has power to allow a longer period for the giving of notice of appeal but he will not normally be prepared to exercise this power unless there are special circumstances which excuse the delay in giving notice of appeal. The First Secretary of State is not required to entertain an appeal if it appears to him that permission for the proposed development could not have been granted by the Local Planning Authority, or could not have been so granted otherwise than subject to the conditions imposed by them, having regard to the statutory requirements, to the provisions of the Development Order, and to any directions given under the Order. He does not in practice refuse to entertain appeals solely because the decision of the Local Planning Authority was based on a direction given by him.

4. If permission or consent to develop land or carry out works is refused or granted subject to conditions, whether by the Local Planning Authority or by the First Secretary of State, and the owner of the land claims that the land has become incapable of reasonably beneficial use by the carrying out of any development or works which has been or would be permitted, he may serve on the Council of the district in which the land is situated a purchase notice requiring the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

5. In certain circumstances, a claim may be made against the Local Planning Authority for compensation where permission is refused or granted subject to conditions by the First Secretary of State on appeal or on a reference of the application to him. The circumstances in which such compensation is payable are set out in Sections 114 and 116 of the Town and Country Planning Act 1990.



Appendix X vi

What are assessment frameworks and how can they be used appropriately?

Assessment frameworks are a set of criteria against which a design can be assessed. They can cover a range of issues that are important for securing well-designed places (such as Building for Life 12) or may focus on particular considerations such as climate change or health.

Local planning authorities and developers may wish to use assessment frameworks to inform the design and evaluation of proposals, and support discussions with local communities and other interests about the creation of good places. Frameworks are effective when the issues within them are considered in relation to the particular context and character of a local area. Authorities may wish to refer to the use of specific frameworks in their policies or supplementary planning guidance that are most relevant to the vision for their area, although it is important to ensure that they are used in a proportionate way and do not conflict with national or local planning policy.

Paragraph: 018 Reference ID: 26-018-20191001

Revision date: 01 10 2019

Appendix X vii

**Planning Obligation by Deed of Agreement under
Section 106 of the Town and Country Planning Act
1990**

relating to Land North of Gardenia Close and
Garden Square, Rendlesham, Suffolk.

Dated

2019

EAST SUFFOLK COUNCIL (1)

SUFFOLK COUNTY COUNCIL (2)

**LILIAS MULGRAVE SHEEPSHANKS and ANDREW MICHAEL ALEXANDER
SKRINE (3)**

[CAPITAL COMMUNITY DEVELOPMENTS LIMITED (4)]

DATE

2019

PARTIES

- (1) **EAST SUFFOLK COUNCIL** of East Suffolk House Station Road Melton Woodbridge Suffolk IP12 1RT ("the Council")
- (2) **SUFFOLK COUNTY COUNCIL** of Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX ("the County Council")
- (3) **LILIAS MULGRAVE SHEEPHANKS** of The Rookery, Eyke, Woodbridge, Suffolk IP12 2Dr and **ANDREW MICHAEL ALEXANDER SKRINE** of 9 New Square, Lincoln's Inn, London WC2A 3QN ("the Owner")
- (4) **CAPITAL COMMUNITY DEVELOPMENTS LIMITED** whose registered office is at 30 Gardenia Close, Rendlesham, Woodbridge, Suffolk, United Kingdom, IP12 2GX (Company Registration Number 09512747) ("the Developer")

INTRODUCTION

1. The Council is the local planning authority for the purposes of the Act for the area in which the Site is situated and by whom the obligations contained in this Deed are enforceable.
2. The County Council is the is the local highway authority (except for trunk roads) and is also a local planning authority for the purposes of the Act for the area in which the Site is situated and by whom the obligations contained in this Deed are enforceable
3. The Owner is the freehold owner of the Site registered (with other land) under title number SK225051.
4. The Council's Planning Committee resolved on [TBC] to grant the Planning Permission subject to the prior completion of this Deed to regulate the Development and to secure the planning obligations contained in this Deed.
5. The Site lies within the area to which the Local Plan applies
6. The Council considers and the Owner and the Developer acknowledge that the Development should not take place until certain restrictions regulating the use of the Site are imposed in the manner hereafter appearing and pursuant to section 106 of the Act the parties have agreed to enter into this Deed in order to secure the planning obligations contained in this Deed.

7. It is a material consideration in the Council's planning policies that in any proposals for residential development in Key Service Centres consisting of three or more new dwellings a proportion of 33% (one in three) of the new dwellings should be provided for Affordable Housing purposes.
8. The Council in resolving to approve the Application is satisfied that the planning obligations sought under the provisions of this Deed meets the test set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended).
9. The Developer intends to purchase the freehold interest in the Site from the Owner subject to receipt of Planning Permission in terms which are satisfactory to the Developer.

NOW THIS DEED WITNESSES AS FOLLOWS:

OPERATIVE PART

1 DEFINITIONS

For the purposes of this Deed the following expressions shall have the following meanings and shall be read in conjunction with the definitions set out in the Third Schedule:

"Act"	the Town and Country Planning Act 1990 as amended.
"Application"	the application for full planning permission validated by the Council on the 9 April 2019 for the Development and allocated reference number DC/19/1499/FUL
"Bridleway Link"	a bridleway (to run between points A and B on the Bridleway Link Plan) with a width of 3 metres and in general conformity with the Bridleway Link Plan to be designated as a bridleway following confirmation of a public path creation order
"Bridleway Link Contribution"	the sum of £4,734.25 payable to the County Council in respect of its staff and design time and order making costs in respect of the public order relating to the Bridleway Link
"Bridleway Link Plan"	the plan attached to this Deed marked "Bridleway Link Plan"

Commented [CG1]: I've removed the compensation element from the contribution as it seems unusual for the landowner to pay a contribution for compensation which will then be paid back to the landowner

“Commencement of Development”	the date on which any material operation (as defined in Section 56(4) of the Act) forming part of the Development begins to be carried out on the Site other than (for the purposes of this Deed and for no other purpose) operations consisting of archaeological investigations, investigations for the purpose of assessing ground conditions, remedial work in respect of any contamination or other adverse ground conditions, diversion and laying of services, erection of any temporary means of enclosure, the temporary display of site notices or advertisements and “Commence Development” shall be construed accordingly.
“Completion of the Development”	the date that the last Dwelling is first Occupied
“Development”	the phased development of the Site for residential development of 75 dwellings, car parking, public open space, hard and soft landscaping and associated infrastructure and access as set out in the Application
“Dwelling”	any dwelling (including a house bungalow flat or maisonette and including both Market Housing Units and Affordable Dwellings) to be constructed pursuant to the Planning Permission and “Dwellings” shall be construed accordingly
“Habitats Sites”	<p>-Alde-Ore Estuary Special Protection Area (SPA) and Ramsar site</p> <p>-Benacre to Easton Bavents SPA and Benacre to Easton Bavents Lagoons (SAC)</p> <p>-Deben Estuary SPA and Ramsar site</p> <p>-Minsmere to Walberswick Heaths & Marshes Special Area of Conservation (SAC)</p> <p>-Minsmere – Walberswick SPA</p> <p>-Orfordness-Shingle Street SAC</p> <p>-Sandlings SPA –</p>

	Stour and Orwell Estuaries SPA and Ramsar site
"Habitats Sites Mitigation Contribution"	means the sum of £24,091.50 (twenty-four thousand and ninety-one pounds and fifty pence) (Index Linked) calculated using the Habitat Mitigation Contribution Calculation to be paid by the Owner to the Council as a contribution towards the non-infrastructure measures to alleviate the impact of the Development on the Habitats Sites
"Habitats Sites Mitigation Contribution Calculation"	the sum of £321.22 (three hundred and twenty one pounds and twenty two pence) multiplied by the total number of new dwellings proposed pursuant to the Planning Permission
"Index"	All In Tender Price Index published by the Building Cost Information Service of the Royal Institution of Chartered Surveyors or any successor organisation.
"Index Linked"	the increase in any sum referred to in the Third Schedule by an amount equivalent to the increase in the Index to be calculated in accordance with Clause 10 of this Deed.
"Interest"	Interest at four (4) per cent above the base lending rate of the Bank of England from time to time.
"Local Plan"	Suffolk Coastal District Local Plan Core Strategy & Development Management Policies – Development Plan Document July 2013 & Site Allocations and Area Specific Policies Development Plan Document January 2017 & Rendlesham Neighbourhood Plan January 2015.
"Occupation" and "Occupied"	occupation for the purposes permitted by the Planning Permission but not including occupation by personnel engaged in construction, fitting out or decoration or occupation for marketing or display or occupation in relation to security operations.

Commented [CG2]: EDC to confirm which is applicable

Commented [CG3]: The justification for the Bridleway Contribution seems to be the same as the justification for this contribution. Please provide an evidence base for the need for both forms of mitigation

"Phase 1"	the area of land edged red and marked "1" on the Phasing Plan
"Phase 2"	the area of land edged red and marked "2" on the Phasing Plan
"Phase 3"	the area of land edged red and marked "3" on the Phasing Plan
"Phasing Plan"	the plan attached to this Deed which is marked Phasing Plan and which forms part of the Application
"Plan"	the plan attached to this Deed
"Planning Permission"	the full planning permission subject to conditions to be granted by the Council pursuant to the Application substantially as set out in the draft annexed to the Second Schedule.
"Section 106 Officer"	the officer so designated by the Council and any notice required to be served on the Council must be sent or delivered to the Council at the address aforesaid marked for the attention of the Section 106 Officer
"Site"	the land described in the First Schedule against which this Deed may be enforced as shown edged red for identification purposes only on the Plan
"Transport Information Board"	a solar-powered real time screen at the Redwald Drive stop opposite Sparrowcroft Road
"Transport Information Board Contribution"	the sum of £15,000 (Index Linked) payable to Suffolk County Council for the provision of the Transport Information Board

“Working Days”

Monday to Friday (inclusive) except Good Friday, Christmas Day and public or bank holidays from time to time in England.

2 CONSTRUCTION OF THIS DEED

2.1 Where in this Deed reference is made to any clause, sub-clause, paragraph, sub-paragraph or schedule or recital such reference (unless the context otherwise requires) is a reference to a clause, sub-clause, paragraph, sub-paragraph or schedule or recital in this Deed.

2.2 Words importing the singular meaning where the context so admits include the plural meaning and vice versa.

2.3 Words of the masculine gender include the feminine and neuter genders and words denoting actual persons include companies, corporations and firms and all such words shall be construed interchangeable in that manner.

2.4 Wherever there is more than one person named as a party and where more than one party undertakes an obligation all their obligations can be enforced against all of them jointly and severally unless there is an express provision otherwise.

2.5 Any reference to an Act of Parliament or Directive of the European Union shall include any modification, extension or re-enactment of that Act or Directive for the time being in force and shall include all instruments, orders, plans regulations, permissions and directions for the time being made, issued or given under that Act or Directive or deriving validity from it

2.6 Any references to any party to this Deed shall include the successors in title to that party and to any person deriving title through or under that party and in the case of the Council the successors to its statutory functions.

2.7 The headings are for reference only and shall not affect construction.

2.8 Any covenant by the County Council or the Developer not to do an act or thing shall be deemed to include an obligation to use all reasonable endeavours not to permit or suffer such act or thing to be done by another person where knowledge of the actions of the other person is reasonably to be inferred

2.9 Any notices required to be given under the terms of this Agreement may (in addition to any other valid method of service) be given or served by sending the same by recorded delivery post addressed to the party as set out below

Council: as given in this Deed for the attention of the Section 106 Officer

County Council: as given in this Deed

Owner: as given in this Deed

Developer: as given in this Deed

3 LEGAL BASIS

3.1 This Deed is made pursuant to Section 106 of the Act Section 111 of the Local Government Act 1972 and Section 1 of the Localism Act 2011 and all other enabling powers

3.2 The covenants, restrictions and requirements imposed upon the Owner and the Developer under this Deed create planning obligations pursuant to Section 106 of the Act and are enforceable by the Council as local planning authority against the Owner and the Developer and their successors in title.

3.3 Insofar as any of the covenants contained in this Agreement are not planning obligations within Section 106 of the Act they are entered into pursuant to the powers

contained in Section 111 of the Local Government Act 1972, Section 1 of the Localism Act 2011 and all other enabling powers.

3.4 The covenants, restrictions and requirements contained in this Deed shall only be capable of being varied by a supplemental deed between the parties hereto or their respective successors in title or assigns made under Section 106A of the Act.

4 CONDITIONALITY

The obligations set out in the Third Schedule and Fourth Schedule are conditional upon:

- (i) the grant of the Planning Permission; and
- (ii) the Commencement of Development

and the rest of the provisions set out in this Deed shall take effect immediately upon completion of this Deed.

5 THE OWNER COVENANTS

5.1 The Owner hereby covenants with the Council as set out in the Third Schedule so as to bind the Site and each and every part thereof

5.2 The Owner hereby covenants with the County Council as set out in the Fourth Schedule so as to bind the Site and each and every part thereof

5.3 The Owner covenants and warrants to the Council and the County Council that the Owner is the freehold owner of the Site and has full power and capacity to enter into this Deed and that no other party has any charge over or any other interest in the Site which would require them to be a party to this Deed or whose consent is required to make this Deed binding on the Site and all estates and interests therein

5.4 The Developer consents to and confirms the terms of this Deed

6 THE COUNCIL'S COVENANTS

6.1 The Council hereby covenants with the Owner and the Developer as set out in the Fifth Schedule.

7 THE COUNTY COUNCIL'S COVENANTS

7.1 The County Council hereby covenants with the Owner and the Developer as set out in the Sixth Schedule.

8 MISCELLANEOUS

8.1 No provisions of this Deed shall be enforceable under the Contracts (Rights of Third Parties) Act 1999

8.2 This Deed shall be registrable as a local land charge by the Council.

8.3 Where the agreement, approval, consent or expression of satisfaction is required by the Owner or the Developer from the Council or the County Council under the terms of this Deed such agreement, approval or consent or expression of satisfaction shall not be unreasonably withheld or delayed and any such agreement, consent, approval or expression of satisfaction shall be given on behalf of the Council by the Head of Planning Services (or the officer of the Council fulfilling such functions) and shall be given on behalf of the County Council by [XXX] and any notices shall be deemed to have been properly served if sent in accordance with clause 2.9.

8.4 Following the performance and satisfaction of all the obligations contained in this Deed the Council shall forthwith on the written request of the Owner or the Developer mark accordingly all entries made in the Register of Local Land Charges in respect of this Deed.

8.5 Insofar as any clause or clauses of this Deed are found (for whatever reason) to be invalid illegal or unenforceable then such invalidity illegality or unenforceability shall not affect the validity or enforceability of the remaining provisions of this Deed.

8.6 This Deed shall cease to have effect (insofar only as it has not already been complied with) if the Planning Permission shall be quashed, revoked or otherwise withdrawn or (without the consent of the Developer) it is modified by any statutory procedure or expires prior to the Commencement of Development.

8.7 No person shall be liable for any breach of any of the planning obligations or other provisions of this Deed after it shall have parted with its entire interest in the Site or any part in respect of which such breach occurs but without prejudice to liability for any subsisting breach arising prior to parting with such interest.

8.8 This Deed shall be enforceable (in respect of any restriction on occupation and use only) against owner-occupiers or tenants of Dwellings constructed pursuant to the Planning Permission and against those deriving title from them

8.9 Nothing in this Deed shall prohibit or limit the right to develop any part of the Site in accordance with a planning permission (other than the Planning Permission) granted (whether or not on appeal) after the date of this Deed.

8.10 Nothing contained or implied in this Deed shall prejudice or affect the rights, discretions, functions, powers, duties and obligations of the Council under all statutes by-laws statutory instruments orders and regulations in the exercise of its functions as a local authority.

8.11 The Owner and the Developer covenant from the date that this Deed takes effect to allow upon a minimum of 48 hours' notice the Council and its respectively duly authorised officers or agents at all reasonable times to enter into and upon the Site for the purposes of monitoring compliance with the provisions of this Deed

8.12 The Developer hereby agrees that any rights to claim compensation arising from any limitations or restrictions on the planning use of the Site under the terms of this Agreement are hereby waived

8.13 Save as otherwise provided in this Deed all works and activities to be carried out under the terms of this Deed (including for the avoidance of doubt such works as are of a preparatory ancillary or of a maintenance nature) are (save where expressly provided otherwise) to be at the sole expense of the Owner or the Developer and at no cost to the Council or County Council

8.14 The Developer covenants to pay the Council's and County Council's reasonable legal costs incurred in the preparation and negotiation and completion of this Deed

9 WAIVER

No waiver (whether expressed or implied) by the Council or County Council of any breach or default in performing or observing any of the covenants terms or conditions of this Deed shall constitute a continuing waiver and no such waiver shall prevent the Council or County Council from enforcing any of the relevant terms or conditions or for acting upon any subsequent breach or default.

10 CHANGE IN OWNERSHIP

The Owner agrees with the Council as soon as practicable to give the Council written notice of any change in ownership of any of its interests in the Site occurring before all the obligations under this Deed have been discharged such notice quoting the Council's reference DC/19/1499/FUL to give details of the transferee's full name and registered office (if a company or usual address if not) together with the area of the Site purchased by reference to a plan and the title number or numbers thereof PROVIDED THAT this obligation shall not apply to transfers of individual Dwellings within the Development or the transfer or grant of leases of electricity sub-stations or gas governors or the like

11 INDEXATION

Any sums referred to in the Third and Forth Schedules (unless the context reads otherwise) shall be increased by an amount equivalent to the increase in the Index (unless the context reads otherwise) from the date hereof until the date on which such sum is payable using the application of the formula $A = B \times C/D$ where:

10.1 A is the sum payable under this Deed;

10.2 B is the original sum specified in this deed;

10.3 C is the Index for the month 2 months before the date on which the sum is payable;

10.4 D is the Index for the month 2 months before the date of this Deed; and

10.5 C/D is greater than 1

12 INTEREST

If any payment due under this Deed is paid late, Interest will be payable from the date payment is due to the date of payment.

13 VAT

All consideration given in accordance with the terms of this Deed shall be exclusive of any value added tax properly payable.

14 DISPUTE PROVISIONS

14.1 In the event of any dispute or difference arising between any of the Parties to this Deed in respect of any matter contained in this Deed such dispute or difference shall be referred to an independent and suitable person holding appropriate professional qualifications to be appointed (in the absence of an agreement) by or on behalf of the president for the time being of the professional body chiefly relevant in England with such matters as may be in dispute and such person shall act as an Expert ("the Expert") whose decision shall be final and binding on the Parties to the dispute in the absence of manifest error and any costs shall be payable by the parties to the dispute in such proportion as the Expert shall determine and failing such determination shall be borne by the parties to the dispute in equal shares.

14.2 In the absence of agreement as to the appointment or suitability of the person to be appointed pursuant to Clause 14.1 or as to the appropriateness of the professional body then such question may be referred by either party to the president for the time being of the Law Society for him to appoint a solicitor to determine the dispute such solicitor acting as an Expert and his decision shall be final and binding on all parties in the absence of manifest error and his costs shall be payable by the parties to the dispute in such proportion as he shall determine and failing such determination shall be borne by the parties to the dispute in equal shares.

14.3 Any Expert howsoever appointed shall be subject to the express requirement that a decision was reached and communicated to the relevant parties within the minimum practicable timescale allowing for the nature and complexity of the dispute and in any event not more than twenty-eight working days after the conclusion of any hearing that takes place or twenty-eight working days after he has received any file or written representation.

14.4 The Expert shall be required to give notice to each of the said parties requiring them to submit to him within ten working days of notification of his appointment written submissions and supporting material and the other party will be entitled to make a counter written submission within a further ten working days.

14.5 The provisions of this clause shall not affect the ability of the Council, County Council and/or the Owner to apply for and be granted any of the following: declaratory relief, injunction, specific performance, payment of any sum, damages, any other means of enforcing this Deed and consequential and interim orders and relief

15 JURISDICTION

This Deed is governed by and interpreted in accordance with the law of England and Wales and the Parties submit to the non-exclusive jurisdiction of the courts of England and Wales.

16 DELIVERY

The provisions of this Deed (other than this clause which shall be of immediate effect) shall be of no effect until this Deed has been dated.

IN WITNESS whereof the Parties hereto have executed this Deed on the day and year first before written.

THE COMMON SEAL OF
EAST SUFFOLK COUNCIL
as affixed in the presence of:

.....Authorised Officer

.....Authorised Officer

THE COMMON SEAL OF
SUFFOLK COUNTY COUNCIL
as affixed in the presence of:

.....Authorised Officer

.....Authorised Officer

SIGNED AS A DEED by
LILIAS MULGRAVE SHEEPSHANKS
In the presence of:

.....

SIGNED AS A DEED by
ANDREW MICHAEL ALEXANDER SKRINE In
the presence of:

.....

EXECUTED AS A DEED BY
**CAPITAL COMMUNITY DEVELOPMENTS
LIMITED** acting by a director in the presence
of:

.....Director

.....
Witness Signature

Witness Name

Witness Address

FIRST SCHEDULE

Details of the Owner's Title, and description of the Site

The freehold land lying to the north west of Redwald Road, Rendlesham Suffolk registered with other land at the Land Registry under title number SK225051 (being the land shown edged red on the Plan)

SECOND SCHEDULE

Brief details of the Application

Commented [CG4]: To be provided by EDC

THIRD SCHEDULE

The Owner Covenants with the Council

1 Definitions

"Affordable Dwellings"	that part of the Development comprising twelve (12) Affordable Private Rented Units and thirteen (13) Discounted Market Sale Units as shown on the Affordable Housing Locations Plan
"Affordable Housing"	means the Affordable Dwellings to be made available as Affordable Private Rent Units and Discount Market Housing Units as hereinafter set out that will be available to Eligible Households as hereinafter defined whose needs are not met by the market for them to afford determined with regard to local incomes and local house prices
"Affordable Housing Locations Plan"	the plan attached to this Deed which is marked Affordable Housing Locations Plan
"Affordable Private Rented Units"	Build to Rent Dwellings that are provided at a maximum of 80% of Market Rent (inclusive of service charge)
"Affordable Private Rented Units Annual Statement"	<p>an annual statement produced by the Affordable Private Rented Units Landlord confirming the following:</p> <ul style="list-style-type: none">i. The approach to the letting of the Affordable Private Rented Units;ii. Their ongoing status; and <p>How the Development is meeting the overall level of Affordable Dwellings required by the Planning Permission</p>
"Affordable Private Rented Units Strategy"	<p>a strategy that relates to the Occupation of the Affordable Private Rented Units which must include:</p> <ul style="list-style-type: none">i. Local marketing to be adopted within the Council's administrative area;ii. Measures to demonstrate that a consistent and quality level of housing management will be offered that meets appropriate standards;iii. The identity of the Build to Rent Landlord if it is not []; andiii. Details of a management and servicing arrangements, the form of tenancy

Commented [CG5]: TBC

arrangements and rent review mechanisms

“Build to Rent” iv. purpose built housing that is 100% rented out and offered on a minimum lease term of three years and collectively in the same ownership and management arrangement (by the Build to Rent Landlord)

“Build to Rent Landlord” [XXX] or such other person as agreed in writing with by the Council

Commented [CG6]: TBC

“Discount Market Housing Units” Dwellings provided for sale at a cost not exceeding 80% of Open Market Value as may be consistent with any Intermediate Housing Unit criteria within the National Planning Policy Framework published in February 2019 (or as may be amended from time to time).

“Eligible Household” a person or persons currently resident within the administrative area of East Suffolk Council (unless otherwise agreed with the Council on a case by case basis) who are unable to rent or buy in the local open market

“Market Housing Units” that part of the Development comprising 55 Dwellings which is general market housing for sale on the open market and which is not Affordable Housing

“Market Rent” means market rent as defined in the latest edition of the Red Book and certified by a member of the Royal Institution of Chartered Surveyors who has relevant experience of the property market in the area

“Open Market Value” means the market value of the Affordable Housing Units ("market value" being as defined Red Book) or any replacement edition but on the assumption that the Affordable Housing Units can be sold on the open market without restriction on price, tenure, ownership or occupation free from the implications contained in this Deed and assuming that the Affordable Housing Unit is newly completed decorated and equipped and ready in all respects for first residential occupation and which shall be evidenced by the provision of valuations from three suitably qualified valuers who are independent and not employed by the Owner

“Practical Completion” issue of a certificate of practical completion by the

“Red Book”

Owner’s architect or if the Development is constructed by a party other than the Owner the issue of a certificate of practical completion by that other party’s architect;
means the RICS Valuation – Global Standards 2017 (the Red Book) or such other document amending, consolidating or replacing it

Part 1

Affordable Housing

1. General

- 1.1 Not to use the Affordable Dwellings for any purpose other than in accordance with this Deed unless otherwise agreed in writing with the Council

2. Affordable Housing Rented Units

- 2.1 The Owner covenants to submit the Affordable Private Rented Units Strategy to the Council for approval prior to Occupation of 10th Market Housing Unit.
- 2.2 The Affordable Private Rented Units shall only be Occupied and managed in accordance with the approved Affordable Private Rented Units Strategy unless otherwise.
- 2.3 Every year between the 1st April and 30th April the Owner covenants to submit the Affordable Private Rented Units Annual Statement to the Council

3. Discount Market Housing Units

- 3.1 The Discount Market Housing Units shall only be disposed of (which term shall include a freehold sale or sale of a registrable lease) on the terms specified herein:
- 3.2 The maximum price payable to the Owner in respect of the disposal of a Discount Market Housing Units shall not exceed 80% of the Open Market Value (for sale or leasehold purposes) as certified by an independent valuer or surveyor who practices within a 15 mile radius of the Site
- 3.3 Where the freehold or a registrable leasehold interest in Discount Market Housing Units is transferred such transfer and all such subsequent transfers shall contain a covenant binding on the transferee and all subsequent transferees that no transfer shall take place save a disposal of the freehold or registrable leasehold interest in the Discount Market Housing Units at a price or premium which does not exceed

80% of the Open Market Value of the said unit at the date of disposal as certified by an independent valuer or surveyor in the manner described in paragraph 3.2 above

3.4 No purchaser of a Discount Market Housing Units shall sub-let or otherwise rent out such Discount Market Housing Units.

3.5 The transfer to a person specified in this Part 1 shall contain a covenant binding on the transferee and all subsequent transferees from the date of the first transfer by the Owner that the transferee and any future transferees of the Discount Market Housing Units will procure a direct covenant from each successive transferee in favour of the Council to observe and perform all of the covenants specified in this Part 1

3.6 The transfer to a person specified in this Part 1 shall contain a covenant binding on the transferee and all subsequent transferees from the date of the first transfer by the Owner that the transferee and any future transferees of the Discount Market Housing Units will on each transfer of the said units apply for the following Restriction (or a Restriction in similar terms) to be entered in the Register of the title in the property

"No transfer, assent or other dealing by the Proprietor of the property is to be registered without the transferee's solicitor producing to the Land Registry a Certificate confirming that the purchase price for the property does not exceed 80% of the open market value as determined in accordance with a Section 106 Agreement dated (the date hereof to be inserted) and made under Section 106 Agreement given under the Town and County Planning Act 1990 between (the parties hereto to be inserted)".

3.7 Nothing in the transfer shall operate to restrict delay limit or prevent the immediate occupation or disposal of any Discount Market Housing Units to or by a person and those living with him where such occupation or disposal arises as a result of a court order or any other statutory provision or presumption or will or intestacy but subject always to the strict compliance by any transferee of the legal estate with the provisions of this paragraph before any further disposal for value of the legal estate takes place.

Part 2

Habitat Mitigation Contribution

1. Prior to Commencement of Development the Owner shall pay to the Council 33% of the Habitats Sites Mitigation Contribution
2. The Owner covenants not to cause or permit Occupation until 33% of the Habitats Sites Mitigation Contribution has first been paid to the Council
3. Prior to Occupation of the 25th Dwelling the Owner shall pay to the Council a further 33% of the Habitats Sites Mitigation Contribution
4. The Owner covenants not to cause or permit Occupation of more than 24 Dwellings until 66% of the Habitats Sites Mitigation Contribution has first been paid in full to the Council
5. Prior to Occupation of the 50th Dwelling the Owner shall pay to the Council the final 34% of the Habitats Sites Mitigation Contribution
6. The Owner covenants not to cause or permit Occupation of more than 49 Dwellings until the Habitats Sites Mitigation Contribution has first been paid in full to the Council
7. If any part of the Habitats Sites Mitigation Contribution remains unpaid after 28 days after it is due, Interest will be payable in accordance with Clause 11.

FOURTH SCHEDULE

The Owner's Covenants with the County Council

1. Bridleway Link

- 1.1 The Owner covenants to pay to the County Council the Bridleway Contribution within 28 days of receipt of notice from the County Council that the public order referred to paragraphs 2.1 and 2.2 of the Sixth Schedule has been confirmed.

2. Transport Information Board Contribution

- 2.1 The Owner covenants to pay to the County Council the Transport Information Board Contribution prior to Occupation of the 25th Dwelling.
- 2.2 The Owner covenants not to Occupy more than 24 Dwellings until the Transport Information Board Contribution has been paid to the County Council.

FIFTH SCHEDULE

Council's Covenants with the Owner

1. Planning Permission

- 1.1 The Council covenants to issue the Planning Permission within 5 Working Days of the date of this Deed.

2. Discharge of obligations

- 2.1 At the written request of the Owner or the Developer the Council shall provide written confirmation of the discharge of the obligations contained in this Deed when satisfied that such obligations have been performed.

3. Habitats Sites Mitigation Contribution

- 3.1 The Council shall deposit the Habitats Sites Mitigation Contribution into an interest bearing account and will apply the capital and any interest accrued wholly and exclusively towards non infrastructure measures to alleviate the impact of the Development on the Habitats Sites.
- 3.2 If the Habitats Sites Mitigation Contribution and interest accrued thereon has not been committed (by way of contract or expenditure of the monies) within five years of receipt of payment the Council will refund any unspent balance of the Habitats Sites Mitigation Contribution to the payer together with any accrued interest.

SIXTH SCHEDULE

County Council's Covenants with the Owner

1. Discharge of obligations

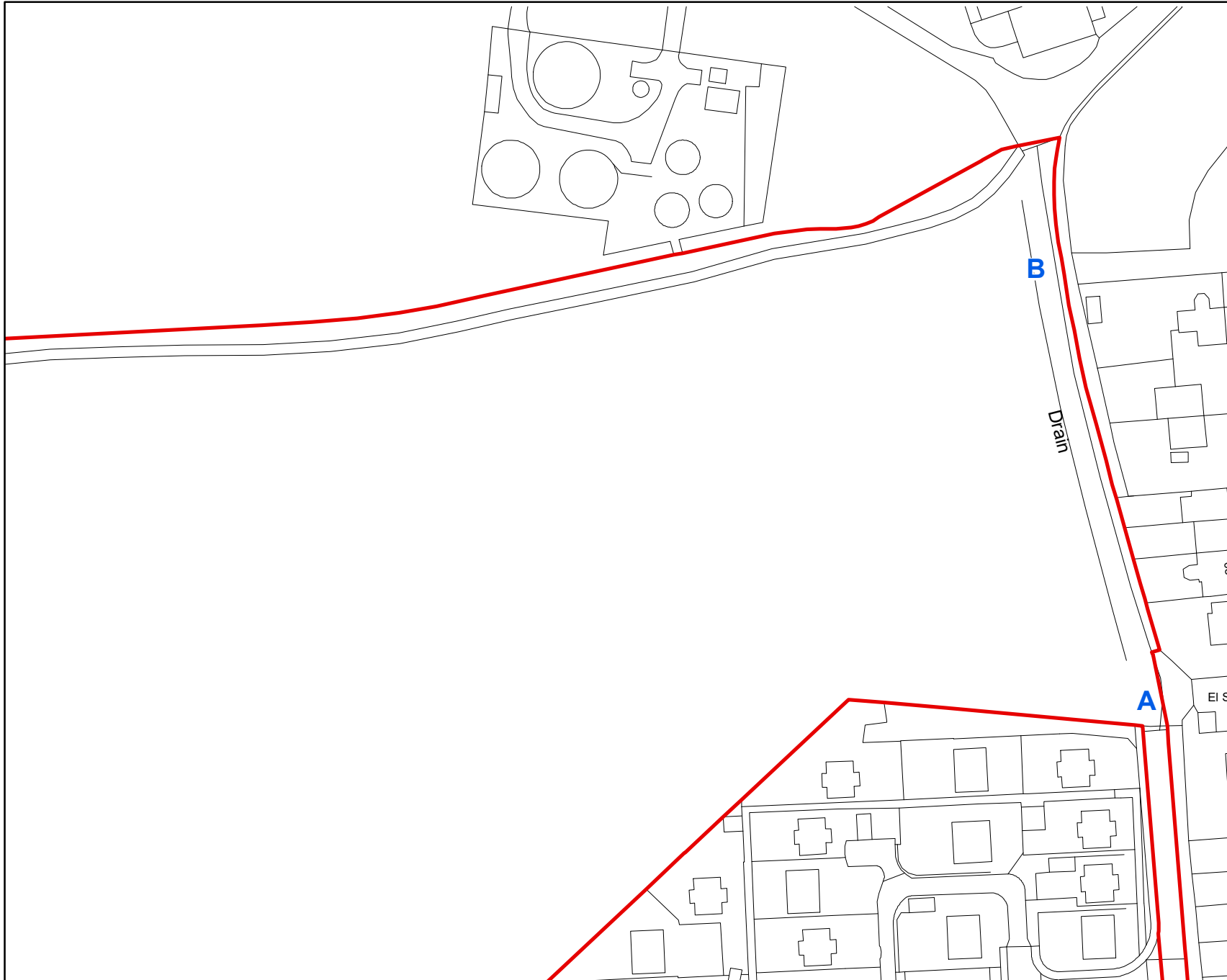
- 1.1 At the written request of the Owner or the Developer the County Council shall provide written confirmation of the discharge of the obligations contained in this Deed when satisfied that such obligations have been performed.




2. Bridleway Link

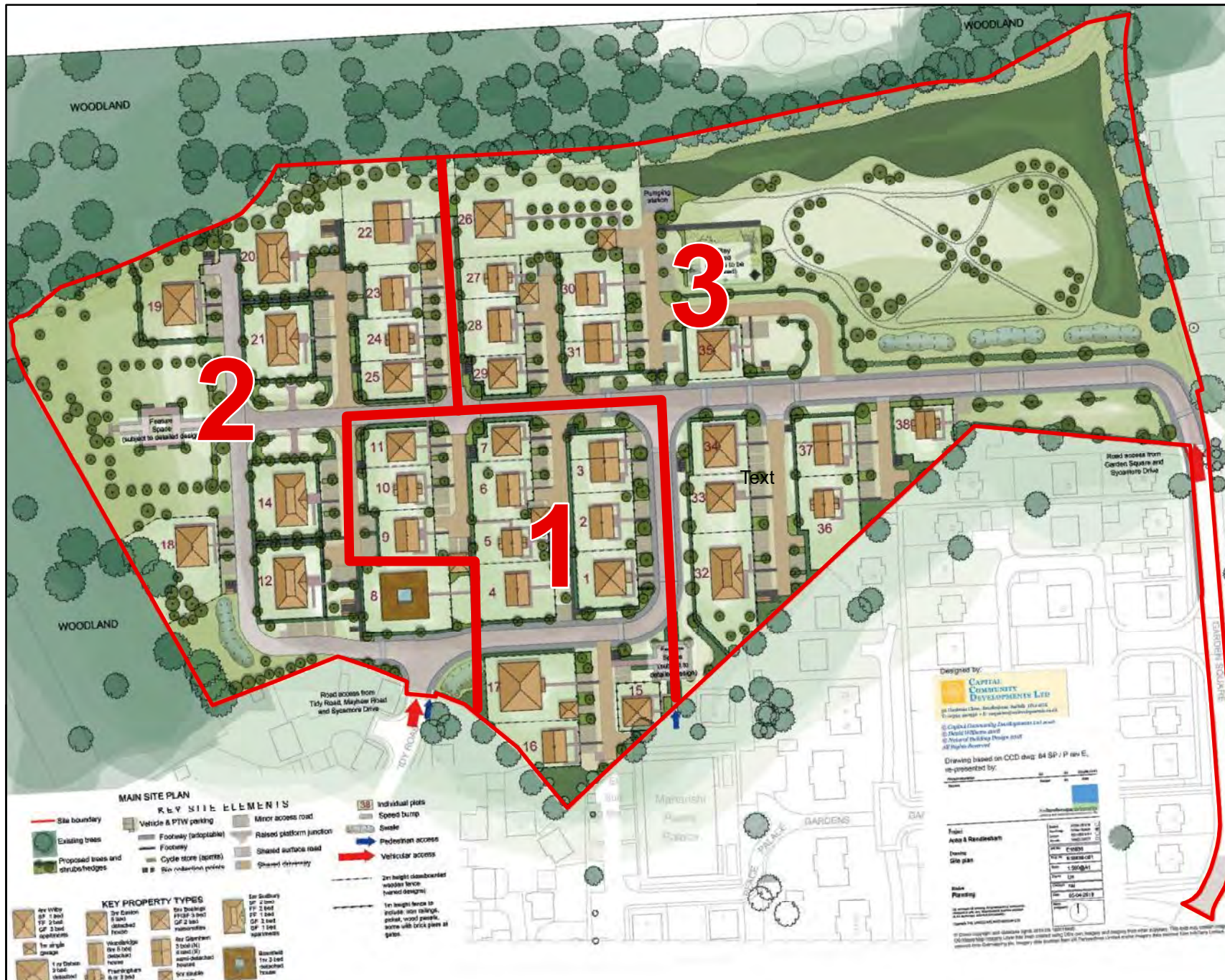
- 2.1 Within a period of 5 years from the date of this Deed the County Council will apply for a public path order to enable the Bridleway Link to be used as a bridleway by the public.
- 2.2 The County Council covenants to inform the Owner when the public path order has been made and when it has been confirmed.
- 2.3 The County Council covenants to use reasonable endeavours to obtain landowner consent to create a bridleway from the Bridleway Link points A to B as shown on the Bridleway Link Plan.

3. Transport Information Board Contribution

- 3.1 The County Council covenant to provide the Transport Information Board for its intended purposes under this Deed and for no other purpose.
- 3.2 If the Transport Information Board Contribution and interest accrued thereon has not been committed (by way of contract or expenditure of the monies) within five years of receipt of payment the County Council will refund any unspent balance of the Transport Information Board Contribution to the payer together with any accrued interest.
- 3.3 The County Council covenant that when the Transport Information Board Contribution paid to the County Council pursuant to this Deed has been spent or committed a notice will be provided to the Owner such notice to include full details of what the said monies were spent on or committed to.



Key  Site	
<p>© Crown copyright and database rights 2018 OS 100019980</p> <p>OS MasterMap Imagery Layer has been created using OS's own imagery and imagery from other suppliers. This data may contain imagery data sourced from Getmapping plc, imagery data sourced from UK Perspectives Limited and/or imagery data sourced from Info erra Limited.</p> <p>N</p>  <p>0 20 40 Metres</p>	
Project: PS-2018-0645 Rendlesham	
Drawing title: Bridleway Link Plan	
Drawing no: 2018/0645 BLP1	
Rev.0	Date: May 2019
Scale: 1:1250 at A4	Drawn: TP
	



Key

Site

0 25 50
Metres

Project: PS-2018-0645 Rendlesham

Drawing title: Phasing Plan

Drawing no: 2018/0645 | PP1

Rev.0 Date: May 2019

Scale: NTRS at A4 Drawn: TP

Appendix X viii

Steven Bainbridge

From: Nick Sibbett <[REDACTED]>
Sent: 26 November 2019 17:37
To: consultations@naturalengland.org.uk; Shapland, Francesca
Cc: Steven Bainbridge; Anthony Hardy
Subject: East Suffolk Council reference DC/19/1499/FUL - HRA for development of 75 dwellings
Attachments: App 2 E18836-TLP-001 opt no areial.pdf; 2019-04-08 E18836 Area 8 Rendlesham HRA issue.pdf; planning decision notice 8 July 2019.pdf; SWT letter May 2019.pdf; Officers report for delegated decision.pdf

Francesca, I assume that you will be dealing with this in your new role but please do pass it to the correct officer if someone else would be better placed.

In April 2019, an application (DC/19/1499) was made by my client Capital Community Developments for a development of 75 dwellings at Land North of Gardenia Close and Garden Square Rendlesham Suffolk. An 'information for HRA' report that I prepared was submitted with the application, but it appears that Natural England was not consulted by the LPA East Suffolk Council, despite the Council's ecologist advising the planning officer to do so. The application was then refused on 8th July 2019 for a number of reasons, including impact on European designated sites. The planning officer's 'Report for Delegated Planning Application' (undated) is considered by me to not be of sufficient quality to consist of a legally valid Habitats Regulations Assessment, as it provides very little substantive evidence to support its assertions and it does not refer to the conservation objectives of any European site as legally required. There is no policy in the Local Plan, or a requirement in the Local Plan HRA, for a 2.7km walk to be provided, and the RAMS documentation does not require a 2.7km walk to be provided, so this part of the 'HRA' reason for refusal is unexpected.

Capital Community Developments intends to appeal against the refusal, including the HRA reasons, on the grounds that no proper HRA was completed by the Council, the Council did not carry out its statutory requirement to consult you on its 'HRA', and in any case the information for HRA demonstrated that the development would not impact on any European site.

My 'information for HRA' report showed that the development site is not in walking distance of any European site, and it proposed the RAMS contribution of £321 per dwelling towards management and monitoring of European sites as has become standard practice in East Suffolk. Furthermore, my report pointed out that the site was allocated for residential development in the Suffolk Coastal Local Plan, which itself had been subject to HRA and found to have no likely significant effect / no adverse effect on any European site. Suffolk Wildlife Trust did not object to the planning application.

Attached is

- Information for HRA report
- Officer's report for Delegated Planning Permission (see 53rd page of 57)
- Decision notice
- Development layout
- SWT letter

To assist with the appeal, and potentially to save Natural England being asked to provide evidence, I would be grateful if you would consider the LPAs Reasons for Refusal, and the information on which it is based. Your advice to both me and East Suffolk Council's planning department on your response to the planning application would be helpful. Specifically, if you had been consulted by the Council on its 'HRA', would you have advised that the application be refused or would you have not objected, perhaps with comments or request for more information?

Do ask if you need any further information and I look forward to hearing from you shortly.

Best regards

Nick

Nick Sibbett

Associate

The Landscape Partnership

The Granary, Sun Wharf, Deben Road, Woodbridge, Suffolk, IP12 1AZ
Greenwood House, 15a St Cuthbert's Street, Bedford MK40 3JG
t: 01394 380 509 (Woodbridge)
t: 01234 261315 (Bedford)

w: thelandscapepartnership.com

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landscape architecture | urban design | environmental planning | ecology | arboriculture

Appendix X xi

SHARPS REDMORE

ACOUSTIC CONSULTANTS • Established 1990



Report

**Land North of Gardenia
Close and Garden Square,
Rendlesham, Suffolk**

Environmental Noise
Assessment

Prepared by
Gary King MIOA

Date 27th November 2019
Project No 1919177

Head Office

Sharps Redmore

The White House, London Road,
Copdock, Ipswich, IP8 3JH

T 01473 730073

E contact@sharpsredmore.co.uk

W sharpsredmore.co.uk

Regional Locations

South England (Head Office),
North England, Wales, Scotland

Sharps Redmore Partnership Limited

Registered in England No. 2593855

Directors

RD Sullivan BA(Hons), PhD, CEng, MIOA, MAAS, MASA;

DE Barke MSc, MIOA;

KJ Metcalfe BSc(Hons), MIOA

Company Consultant

TL Redmore BEng, MSc, PhD, MIOA



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This report has been prepared with all reasonable skill, care and diligence commensurate with an acoustic consultancy practice under the terms and brief agreed with our client at that time. Sharps Redmore provides no duty or responsibility whatsoever to any third party who relies upon its content, recommendations or conclusions.

1.0 Introduction

- 1.1 Sharps Redmore (SR) have been instructed to undertake a noise assessment at a site of a proposed residential development, at land at north of Gardenia Close and Garden Square, Rendlesham, Suffolk. The site location is shown in Figure 1 below:

FIGURE 1: Site Location



- 1.2 The site is located to the north of Rendlesham and is currently an agricultural field which has been allocated for housing in the Site Allocations and Area Specific Policies document.¹ The immediate area feature woodland to the immediate north and west, with existing residential development along the eastern and southern boundaries. In the north east of the site is an Anglian Water (AW) waste water treatment plant.
- 1.3 A planning application for a phased residential development of 75 properties² was refused by East Suffolk Council. The reasons for refusal did not include any noise issues however the consultation response received from the Council's Environmental Protection Officer stated the following:

"The proximity of the sewage treatment plant may have noise implications for nearby dwellings and the impact of the works will need to be assessed using the appropriate standard;

2. *The internal and external noise level must achieve standards as per BS8233:2014 and listed below:*

- Daytime noise levels for indoor living spaces of 35 dB $L_{Aeq16hr}$ (between the hours of 0700 -2300 hours)
- Daytime noise levels for outdoor areas; garden and amenity space of 50 dB $L_{Aeq16hr}$ (between the hours of 0700 -2300 hours)

¹ Policy SSP12 (Land west of Garden Square, Rendlesham)

² East Suffolk Council Planning Reference DC/19/1499 – Phased development of 75 dwellings, car parking, public open space, hard and soft landscaping and associated infrastructure and access/

- Night-time noise levels for bedrooms of 30 dB $L_{Aeq,8hr}$ and 45 dB L_{Amax} (between the hours of 2300 – 0700 hours)

A noise assessment should be submitted prior to determination of the planning application, with mitigation measures identified as required.”

- 1.4 The purpose of this report is to consider the impact of noise on the proposed residential properties in line with the comments received from the Environmental Protection Officer.
- 1.5 Section 2.0 of this report sets out the government guidance on how the noise impact of such proposals should be assessed. In particular this section considers suitable criteria for the assessment of noise impact from such proposals including BS 8233:2014.
- 1.6 Section 3.0 contains details of surveys of the existing noise climate and of baseline noise source levels.
- 1.7 The assessment of the noise is displayed in section 4.0.
- 1.8 Section 5.0 contains a summary and conclusions.
- 1.9 Appendix C contains details of acoustic terminology employed in this report.

2.0 Assessment Methodology and Criteria

National Policy

- 2.1 The National Planning Policy Framework (NPPF), February 2019, sets out the Government's planning policies for England and "these policies articulate the Government's vision of sustainable development." In respect of noise, Paragraph 180 of the NPPF states the following:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation".*

- 2.2 Guidance on the interpretation of the policy aims contained within the NPPF is contained within National Planning Policy Guidance (NPPG). The NPPG introduces the concept of a noise exposure hierarchy based on likely average response. The guidance contained in the NPPG is summarised in the table below:

TABLE 1: Noise Exposure Hierarchy

Perception	Examples of Outcomes	Increasing Effect Level	Action
Not noticeable	No Effect	No Observed Effect	No specific measures required
Noticeable and not intrusive	Noise can be heard, but does not cause any change in behaviour or attitude. Can slightly affect the acoustic character of the area but not such that there is a perceived change in the quality of life.	No Observed Adverse Effect	No specific measures required
		Lowest Observed Adverse Effect Level	
Noticeable and intrusive	Noise can be heard and causes small changes in behaviour and/or attitude, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows for some of the time because of the noise. Potential for some reported sleep disturbance. Affects the acoustic character of the area such that there is a perceived change in the quality of life.	Observed Adverse Effect	Mitigate and reduce to a minimum

Perception	Examples of Outcomes	Increasing Effect Level	Action
		Significant Observed Adverse Effect Level	
Noticeable and disruptive	The noise causes a material change in behaviour and/or attitude, e.g. avoiding certain activities during periods of intrusion; where there is no alternative ventilation, having to keep windows closed most of the time because of the noise. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in acoustic character of the area.	Significant Observed Adverse Effect	Avoid
Noticeable and very disruptive	Extensive and regular changes in behaviour and/or an inability to mitigate effect of noise leading to psychological stress or physiological effects, e.g. regular sleep deprivation/awakening; loss of appetite, significant, medically definable harm, e.g. auditory and non-auditory	Unacceptable Adverse Effect	Prevent

2.3 The NPPF and NPPG reinforce the March 2010 DEFRA publication, “Noise Policy Statement for England” (NPSE), which states three policy aims, as follows:

“Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:

- *avoid significant adverse impacts on health and quality of life;*
- *mitigate and minimise adverse impacts on health and quality of life; and*
- *where possible, contribute to the improvement of health and quality of life.”*

2.4 Together, the first two aims require that no significant adverse impact should occur and that, where a noise level which falls between a level which represents the lowest observable adverse effect and a level which represents a significant observed adverse effect, then according to the explanatory notes in the statement:

“... all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life whilst also taking into consideration the guiding principles of sustainable development. This does not mean that such effects cannot occur.”

Local Policy

2.5 With regard to local policy reference is made to Development Management Policy DM23 ‘Residential Amenity’ which states the following:

“When considering the impact of new development on residential amenity, the Council will have regard to the following:

- (a) privacy/overlooking;*
- (b) outlook;*

- (c) access to daylight and sunlight;
- (d) noise and disturbance;
- (e) the resulting physical relationship with other properties;
- (f) light spillage, air quality and other forms of pollution; and
- (g) safety and security.

Development will be acceptable where it would not cause an unacceptable loss of amenity to adjoining or future occupiers of the development."

- 2.6 Taking an overview of national policy aims and guidance it is clear that when considering the impact of noise, the fact a noise can be heard and causes impact is not reason to refusal an application. Consideration should also be given to the significance of the impact.

Design Guidance

- 2.7 As referred to by the Council's Environmental Protection Officer the current nationally recommended internal noise levels for dwellings are given in BS 8233:2014 'Guidance on Sound Insulation & Noise Reduction for Buildings'. BS 8233 recommends the following internal noise standards:

TABLE 2: Guideline noise values

BS 8233:2014 Table 4 – Indoor ambient noise levels for dwellings			
Activity	Location	0700 to 2300	2300 to 0700
Resting	Living room	35 dB $L_{Aeq,16hour}$	-
Dining	Dining room/area	40 dB $L_{Aeq,16hour}$	-
Sleeping (daytime resting)	Bedroom	35 dB $L_{Aeq,16hour}$	30 dB $L_{Aeq,8hour}$

- 2.8 There is no longer a L_{AMAX} standard for bedrooms In BS 8233. However, footnote 4 to Table 4 states that *"Regular individual noise events (for example, scheduled aircraft or passing trains) can cause sleep disturbance. A guideline value may be set in terms of SEL or $L_{Amax,F}$ depending on the character and number of events per night. Sporadic noise events could require separate values."* In this case, it is proposed that the previous BS 8233 internal standard (also referenced in World Health Organisation Guidelines for Community Noise) is applied. This is 45 dB L_{AMAX} , inside bedrooms.
- 2.9 For outdoor areas (i.e. balconies), BS 8233:2014 recommends that "it is desirable that the external noise level does not exceed 50 dB L_{AeqT} , with an upper guideline value of 55 dB L_{AeqT} " However, the document recognises that that these guideline values are not achievable in all circumstances and in higher noise areas, a compromise might be warranted. In such circumstances, development should be designed to achieve the lowest practicable levels in these external amenity spaces.
- 2.10 The above guideline values predominantly relate to noise from 'anonymous' sources such as road traffic. Noise from the adjacent waste water treatment works will be of an 'industrial' type character and therefore regard should also be had to the BS 4142:2014:A1:2019 Method for rating and assessing industrial and commercial sound.

2.11 BS 4142 provides a method for rating and assessing sound of an industrial and/or commercial nature including for the purposes of assessing sound at proposed new dwellings or premises used for residential purposes according to the following summary process:

- i) Carry out a numerical assessment by comparing the rating level of sound from deliveries (specific sound plus feature correction) against the existing background noise level. The greater the difference between the two the greater the impact. Differences (rating – background) of around +10 dB is likely to be an indication of significant adverse impact (SOAEL) depending on context; a difference of +5 dB is likely to be an indication of adverse impact, depending on context. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending upon context.
- ii) Consider the impact of noise from deliveries against the context of the site in which it is placed. There are many contextual points to consider when determine the impact of the sound including the following:
 - The absolute level of sound;
 - The character and level of the specific sound compared to the existing noise climate;
 - The sensitivity of the receptors;
 - The time and duration that the specific sound occurs;
 - The conclusions of assessments undertaken using alternative assessment methods, for example WHO guideline noise values or change in noise level;
 - The ability to mitigate the specific sound through various methods.

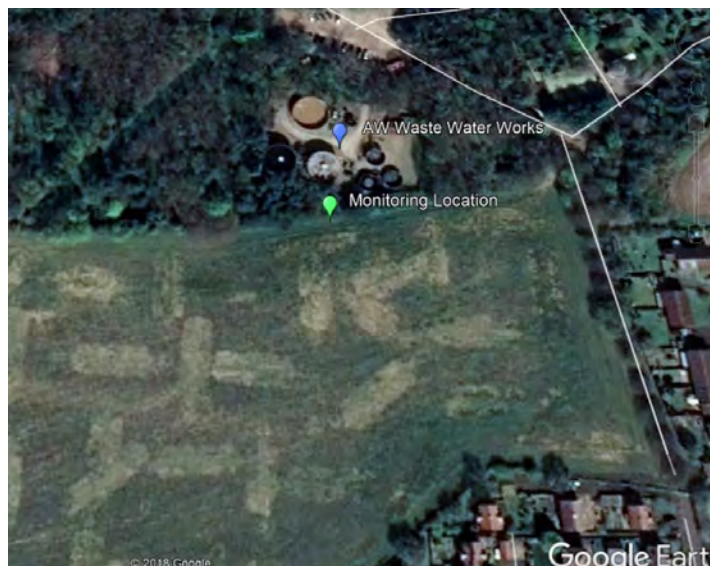
2.12 The assessment method is not intended to be applied to the assessment of indoor sound levels. In such cases the absolute levels in BS 8233 as described above may be as, or more, relevant than the margin by which the rating level exceeds the background. This is especially true at night when background noise levels are low.

2.13 Based on the above and the guidance received from the Council's Environmental Protection Officer it is recommended that during the day to avoid significant adverse impact noise from the treatment works should not exceed the background noise level by more than 10 dB in any garden subject to a maximum level of 50 dB $L_{Aeq16hr}$. During the night the rating level of noise from the treatment works should not exceed 30 dB when determined internally within the bedrooms of the properties.

3.0 Existing Noise Climate

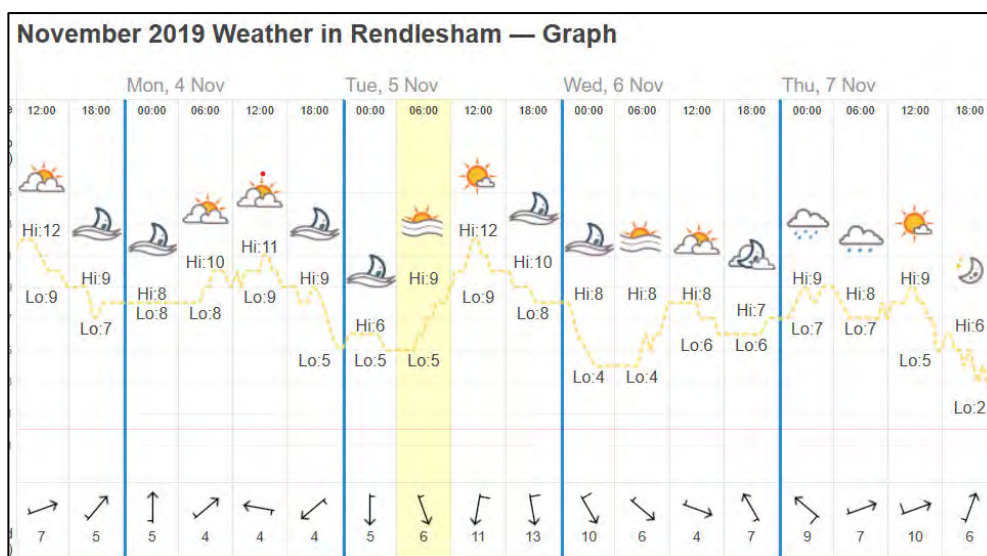
- 3.1 To determine existing baseline conditions a survey of the existing noise climate was carried out between 4th and 7th November 2019. Measurements were carried out at a location on the boundary of the site adjacent to the waste water treatment works as shown in Figure 2 below. The duration of the survey was agreed with the Environmental Protection Officer at East Suffolk Council prior to being carried out.

FIGURE 2: Survey Location



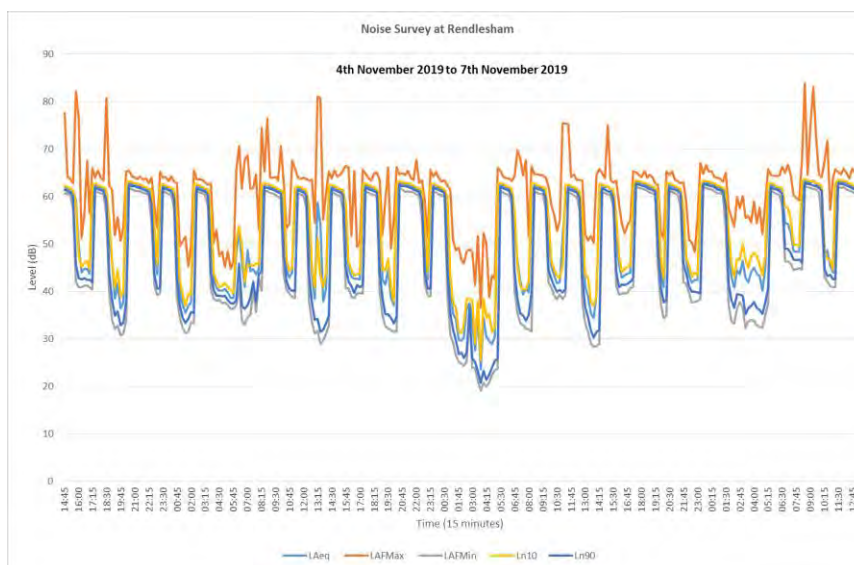
- 3.2 Noise measurements were taken using a Cirrus Type 1 sound level meter which was calibrated at the start and end of the survey. No variation in level was noted. With the exception of a period on 7th November weather conditions during the survey were generally dry, with light winds and suitable for taking noise measurements. A summary of the weather is shown in Figure 3 below:

FIGURE 3: Weather Data Rendlesham (www.timeanddate.com)



- 3.3 Full details of the survey results are included in Appendix A to this report and summarised in the graph and Table 3 below.

FIGURE 4: Survey Results



- 3.4 Using the above noise data the overall existing daytime and night-time noise levels have been determined. The results are shown in Table 3 below:

TABLE 3: Noise Levels – Site Boundary

Date	Day (0700 – 2300 hrs)	Night time (2300 – 0700 hrs)	
	L _{Aeq16hr}	L _{Aeq8hr}	L _{Amax}
4.11.19	60	57	65
5.11.19	59	57	65
6.11.19	59	59*	66*
7.11.19	61*	--	--

*Noise levels affected by period of heavy rain from 00:00 hrs and 10:00 hrs on 7.11.19

- 3.5 It is evident from the results above that noise levels are influenced by plant at the adjacent treatment works. The above graph clearly shows that during periods when the pumps were operating noise levels were at least 20 dB higher than those measured during periods when the plant was not operating. Table 4 shows the noise levels from the plant operating.

TABLE 4: AW Waste Water Treatment Works Site Noise – Boundary

Octave band centre frequency Hz							Awgt
63	125	250	500	1k	2k	4k	
50	51	49	49	53	56	54	61 dB

4.0 Assessment – Noise Impact

- 4.1 The proposed layout of the site is shown in Appendix B to this report. In the north east corner of the site is proposed an area of public open space which is within the cordon sanitaire associated with the Anglian Water waste water treatment plant. Whilst primarily designed to protect residential development against odour, as a result the nearest residential properties have been set back from treatment plant. The nearest properties are plot 26 approx. 100m to the west and plot 35 approx. 80m to the south of the treatment works.
- 4.2 In the open, known as free field, sound attenuates from a point source such as a pump will reduce at a rate of 6dB per each doubling of distance. This is known as geometric spreading or sometimes referred to as the Inverse Square Law. As noise is measured on a Logarithmic scale, this attenuation in distance = $20 \log$ (ratio of distances).
- 4.3 The measurement location was 20 metres from the pump area, taking into account the distance attenuation the resultant noise level at Plot 26 and Plot 35 will be 45 dB and 46 dB respectively.

Daytime

- 4.4 Using the above calculations an assessment of delivery activity noise levels using methodology in BS 4142:2014 has been carried out for the daytime periods. Background noise levels used in the assessment are based on noise levels recorded when the pumps at the waste water plant were not in operation. The typical daytime background level recorded was 35 dB L_{A90} . The results of the assessment are shown in Table 5 below:

TABLE 5: Noise Assessment - Daytime

Results	Plot 26	Plot 35	Commentary
Specific Sound Level	45 dB $L_{Aeq60min}$	46 dB $L_{Aeq60min}$	
Background Sound Level	35 dB $L_{A90,1hr}$	35 dB $L_{A90,1hr}$	
Acoustic Character Correction	+5 dB	+5dB	+3 dB for intermittency and +2 dB for tonality
Rating Level	(45+5 dB)=50 dB	(46+5 dB)=51 dB	
Difference between rating level and background level	+15 dB	+16 dB	
Assessment	Assessment indicates a likelihood of a significant adverse impact subject to context and prior to mitigation.		

- 4.5 As explained in section 2.0 of this report, Section 11 of BS 4142:2014 explains “*The significance of sound of an industrial and/or commercial nature depends upon both the margin by which the rating level of the specific sound source exceeds the background sound level and the context in which the sound occurs.*”
- 4.6 The first contextual consideration is how the predicted delivery activity noise levels compare to the guideline noise values in BS 8233:2014. Predicted noise levels will be at least 4 dB below suggested target level of 50 dB as suggested by the Environmental Protection Officer at East Suffolk Council.

- 4.7 The second contextual consideration in this case is the mitigation measures that can be incorporated into the design of the scheme. As described in para. 4.1 the area immediately adjacent to the treatment works is part of the cordon sanitaire around the works. To reduce noise from the pumping station this area can be landscaped to include an earth bund to screen the treatment works. Where there is insufficient space to have a bund, such along the boundary of Plot 26 an acoustic fence could be used.
- 4.8 Any solid structure between a noise source and receiver will provide a “screening effect”, as long as the barrier structure cuts the line of sight from the receiver to the source. A barrier which just cuts the line of sight will, as a rule of thumb, provide a screening effect of 5 dB. It is unusual in practice to obtain screening losses of more than 15 dB or so because of the physical constraints on barrier height, length and construction. The screening effect of a barrier is determined by the difference in the direct noise path (without barrier) to the receiver and the path over the top of the barrier taken by the noise when the barrier is in place.
- 4.9 A 5m bund/barrier along the northern boundary of the site as shown in Figure 5 below will reduce noise levels from the treatment works by approx. 12 dB resulting in external noise levels within the gardens of between 33 – 34 dB L_{Aeq1hr} . The rating level of noise from the treatment works would be just above existing background noise levels and significantly below the suggested criteria for external amenity spaces in BS 8233:2014.
- 4.10 Assuming a 12 dB reduction through an open window, resultant internal noise levels during the daytime will be 21 – 22 dB L_{Aeq} , this is significantly below the criteria recommended by the Environmental Protection Officer at East Suffolk Council.

FIGURE 5: Proposed acoustic bund/barrier



Night time

- 4.11 As discussed in section 2.0 of this report at night absolute may be as, or more, relevant than the margin by which the rating level exceeds the background noise level. A 5m high bund/barrier as suggested will reduce noise levels from the treatment works by approx. 10 dB at first floor level and 8 dB at second floor level. Assuming a 12 dB reduction through a partially open window internal noise levels at night in first floor bedrooms will be between 23 and 24 dB L_{Aeq} and in second floor bedrooms between 25 and 26 dB L_{Aeq} . Noise levels will be below the criteria in BS 8233:2014 as advised by the Environmental Protection Officer at East Suffolk Council.

- 4.12 Taking into account the screening that can be provided it is concluded that noise from the treatment works will not cause significant adverse impacts to future residents in line with local and national policy aims.
- 4.13 Notwithstanding the above conclusions it is recommended that consideration should also be given to reducing the noise at source. This will involve liaising with Anglia Water who operate the treatment works to identify any measures that can be carried out to reduce noise from the site. This would reduce the screening requirements discussed above.

5.0 Summary and Conclusions

- 5.1 Sharps Redmore has undertaken an environmental noise assessment of a proposed residential development at land north of Gardenia Close and Garden Square, Rendlesham, Suffolk.
- 5.2 The objective of the assessment was to determine the effect of noise from the existing AW waste water treatment works on the proposed residential properties.
- 5.3 A noise survey has been carried out over four days, as agreed with the Environmental Protection Department at East Suffolk Council to determine noise levels from the treatment works.
- 5.4 Criteria were selected by reference to relevant government and international guidance documents and from the recommendations made by the Environmental Protection Department.
- 5.5 Taking into account the cordon sanitaire around the works noise and the proposed screening that will be provided along the northern boundary of the site noise from the treatment works will be below the daytime and night time (both external and internal) criteria recommended by the Environmental Protection Officer
- 5.6 The above mitigation measures can be enforced through a suitably worded planning condition.

APPENDIX A

NOISE SURVEY RESULTS

Appendix A: Survey Results

Time	Noise Level dB				
	L _{Aeq}	L _{AFMax}	L _{AFMin}	L _{A10}	L _{A90}
04/11/2019 14:45	62	77.6	60.6	62.3	61.4
04/11/2019 15:00	61.6	64.2	60.5	61.9	61.1
04/11/2019 15:15	61.4	63.7	60.2	61.7	60.9
04/11/2019 15:30	60.9	62.7	57.4	61.3	60
04/11/2019 15:45	59.3	82.1	42.1	58.4	45.7
04/11/2019 16:00	49.5	76.6	40.9	47.4	42.8
04/11/2019 16:15	43.9	51.2	40.8	45.1	42.5
04/11/2019 16:30	44.8	56.5	41.2	46	42.8
04/11/2019 16:45	44.7	67.5	41.2	46.3	42.4
04/11/2019 17:00	43.7	56.5	40.8	44.7	42.4
04/11/2019 17:15	58.6	66	40.4	62.5	41.9
04/11/2019 17:30	62.3	64	61.2	62.7	61.9
04/11/2019 17:45	62.1	65.5	60.8	62.4	61.6
04/11/2019 18:00	61.8	64	60.6	62.1	61.3
04/11/2019 18:15	61.5	63.4	60.5	61.9	61.1
04/11/2019 18:30	61.2	80.7	55.8	61.5	59.1
04/11/2019 18:45	51.2	62.3	39.8	55.2	43.8
04/11/2019 19:00	46.5	61.5	34	46.5	38.2
04/11/2019 19:15	38.5	51.8	32	40.7	34.9
04/11/2019 19:30	41.6	55.6	32.8	44.6	35.8
04/11/2019 19:45	36.4	50.6	30.8	38.9	32.9
04/11/2019 20:00	37.5	53.5	31.1	39.7	33.4
04/11/2019 20:15	58.9	65.2	33.8	62.8	37.8
04/11/2019 20:30	62.8	65.5	61.8	63.2	62.4
04/11/2019 20:45	62.6	64.3	61.6	63	62.2
04/11/2019 21:00	62.5	64	61.2	62.8	62.1
04/11/2019 21:15	62.3	63.7	61.1	62.6	61.9
04/11/2019 21:30	62.2	64.2	61.1	62.5	61.7
04/11/2019 21:45	61.9	63.5	60.7	62.2	61.5
04/11/2019 22:00	61.6	63.8	60.6	61.9	61.2
04/11/2019 22:15	61.3	62.8	60.2	61.6	60.9
04/11/2019 22:30	60.7	63.9	54.2	61.4	58.4
04/11/2019 22:45	49.7	58	41.2	54	43.5
04/11/2019 23:00	43.6	53.5	39.2	45.6	40.6
04/11/2019 23:15	58.5	65.1	39.5	62.4	40.6
04/11/2019 23:30	62.3	63.9	61.2	62.6	61.8
04/11/2019 23:45	62	64.1	60.9	62.3	61.6
05/11/2019 00:00	61.7	63.2	60.5	62	61.3
05/11/2019 00:15	61.4	64.2	60.3	61.8	61
05/11/2019 00:30	60.9	63.1	57.5	61.4	59.6
05/11/2019 00:45	51.5	62.7	38.6	55.7	42.5
05/11/2019 01:00	40.3	49.5	34.4	42.6	37.1
05/11/2019 01:15	37.1	50.5	32.3	39.2	34.4

Time	Noise Level dB				
	L _{Aeq}	L _{AFMax}	L _{AFMin}	L _{A10}	L _{A90}
05/11/2019 01:30	35.5	51.6	31.2	37	33.4
05/11/2019 01:45	36.9	45.3	31.5	39.4	34.2
05/11/2019 02:00	37.6	49.7	33.5	39.2	35.6
05/11/2019 02:15	58.8	65.5	33.4	62.6	35.5
05/11/2019 02:30	62.2	63.6	61.1	62.6	61.8
05/11/2019 02:45	62	63.6	60.8	62.3	61.5
05/11/2019 03:00	61.7	63.5	60.6	62	61.2
05/11/2019 03:15	61.4	62.9	60.3	61.7	61
05/11/2019 03:30	60.9	62.5	57.7	61.4	60.2
05/11/2019 03:45	52.7	62.7	40.5	57.1	43.8
05/11/2019 04:00	42.3	50.2	38.5	43.9	40.3
05/11/2019 04:15	40.7	52.9	38	42.1	39.1
05/11/2019 04:30	40.1	47.5	38.2	40.9	39.1
05/11/2019 04:45	40.2	48.3	37.5	41.2	38.9
05/11/2019 05:00	40.5	45.1	37.7	41.7	39.1
05/11/2019 05:15	39.8	48.5	37.1	40.8	38.1
05/11/2019 05:30	38.6	44.8	36.3	40.3	37.5
05/11/2019 05:45	38.6	46.2	36.3	39.7	37.4
05/11/2019 06:00	48	65.5	37	50.7	38.1
05/11/2019 06:15	53.2	70.6	41.1	53.7	45.9
05/11/2019 06:30	46.2	61.7	33.9	49.4	36.9
05/11/2019 06:45	40.9	67.8	32.9	42	36.3
05/11/2019 07:00	48.7	68.7	34.5	45.6	37.1
05/11/2019 07:15	44.3	61.6	35	45.5	38.7
05/11/2019 07:30	44.7	61.8	40.4	45.4	42
05/11/2019 07:45	43.6	64.7	35.6	45.8	37.7
05/11/2019 08:00	44.7	53	42.6	45.6	43.7
05/11/2019 08:15	58.8	74.4	40.2	62.5	44.3
05/11/2019 08:30	62.5	65.2	61.1	62.8	62
05/11/2019 08:45	62.5	76.4	61.1	62.6	61.8
05/11/2019 09:00	62	64	60.7	62.4	61.6
05/11/2019 09:15	61.8	64	60.6	62.2	61.4
05/11/2019 09:30	61.5	64.1	60.2	61.9	61.1
05/11/2019 09:45	61.3	63.3	59.9	61.6	60.9
05/11/2019 10:00	61.1	70.6	59.7	61.3	60.6
05/11/2019 10:15	57.2	63	43.5	60.8	47.7
05/11/2019 10:30	44.5	53.4	40.4	46.5	42.2
05/11/2019 10:45	42.9	54.2	39.6	44.4	40.5
05/11/2019 11:00	44	67.6	38.8	44.9	40.1
05/11/2019 11:15	58.1	65.8	38.6	61.9	40
05/11/2019 11:30	61.8	64.1	60.7	62.2	61.4
05/11/2019 11:45	61.5	63.7	60.4	61.9	61.1
05/11/2019 12:00	61.3	63.9	60.1	61.6	60.8
05/11/2019 12:15	60.8	63.7	57.8	61.3	60.3

Time	Noise Level dB				
	L _{Aeq}	L _{AFMax}	L _{AFMin}	L _{A10}	L _{A90}
05/11/2019 12:30	53	63.4	38	58	43.6
05/11/2019 12:45	43.7	63.6	33.5	45.1	37.7
05/11/2019 13:00	38.4	54.4	31.1	40.7	33.9
05/11/2019 13:15	58.7	81.1	31.7	51.1	34.2
05/11/2019 13:30	54.2	80.7	29	43.4	31.4
05/11/2019 13:45	37.9	55.1	29.7	41	31.9
05/11/2019 14:00	40.5	60.7	31.1	43.5	33.3
05/11/2019 14:15	58.7	65.2	32.8	62.4	34.9
05/11/2019 14:30	62.1	63.8	61	62.4	61.7
05/11/2019 14:45	61.8	65.5	60.6	62.2	61.3
05/11/2019 15:00	61.5	64.2	60.3	61.8	61.1
05/11/2019 15:15	61.3	64.5	60.1	61.6	60.8
05/11/2019 15:30	60.9	65.5	57.4	61.3	60.4
05/11/2019 15:45	53.7	66.4	40.6	58.3	45
05/11/2019 16:00	44.7	66.1	40.6	46.1	42.1
05/11/2019 16:15	43.1	51.6	38.8	44.4	41.1
05/11/2019 16:30	42.7	65.4	38.6	43.3	39.7
05/11/2019 16:45	42.7	49.4	39.6	43.6	41.3
05/11/2019 17:00	42.5	50.2	39.5	43.7	40.8
05/11/2019 17:15	58.4	65.6	39.5	62.4	41.3
05/11/2019 17:30	62.4	64.8	61.1	62.7	61.9
05/11/2019 17:45	62.1	64	60.7	62.4	61.6
05/11/2019 18:00	61.8	63.3	60.5	62.1	61.3
05/11/2019 18:15	61.5	64.8	60.2	61.9	61.1
05/11/2019 18:30	61.2	65.1	60.1	61.5	60.8
05/11/2019 18:45	54.9	63.5	40	59.4	44.2
05/11/2019 19:00	42.4	52	34.9	44.6	38.6
05/11/2019 19:15	41.5	59.2	32.6	44.4	35.1
05/11/2019 19:30	44.6	66.1	32.2	46.8	35.2
05/11/2019 19:45	38.6	49	31.8	41	34.4
05/11/2019 20:00	37.1	55	31.5	37.8	33.3
05/11/2019 20:15	59	66.2	31.6	62.8	34.5
05/11/2019 20:30	62.9	64.6	61.8	63.2	62.5
05/11/2019 20:45	62.7	64.9	61.5	63	62.2
05/11/2019 21:00	62.6	64.5	61	62.9	62.1
05/11/2019 21:15	62.5	65.4	61.1	62.8	62
05/11/2019 21:30	62.2	63.9	61	62.6	61.8
05/11/2019 21:45	61.9	63.5	60.8	62.3	61.5
05/11/2019 22:00	61.6	67.7	60.4	61.9	61.2
05/11/2019 22:15	61.4	62.9	60.3	61.7	60.9
05/11/2019 22:30	60.7	63.4	55.4	61.3	58.9
05/11/2019 22:45	50.1	59	41.4	54.4	43.8
05/11/2019 23:00	42.4	51.2	39.2	44	40.6
05/11/2019 23:15	58.6	65.6	39	62.5	40.5

Time	Noise Level dB				
	L _{Aeq}	L _{AFMax}	L _{AFMin}	L _{A10}	L _{A90}
05/11/2019 23:30	62.3	64.2	61.1	62.7	61.9
05/11/2019 23:45	62.1	65.1	60.8	62.4	61.6
06/11/2019 00:00	61.8	63.8	60.4	62.1	61.3
06/11/2019 00:15	61.5	63.1	60.3	61.8	61.1
06/11/2019 00:30	61.2	63.3	60	61.5	60.7
06/11/2019 00:45	55.5	62.3	39.4	59.9	44.6
06/11/2019 01:00	40.8	61.4	30.9	43.3	35.4
06/11/2019 01:15	35.3	50.7	29.2	37.5	31.9
06/11/2019 01:30	34.1	48.7	26.5	36.6	29.7
06/11/2019 01:45	29.8	49.2	25.2	31.5	26.8
06/11/2019 02:00	29.7	46.6	24.8	31.3	27
06/11/2019 02:15	30.1	45.8	24.3	32.9	26
06/11/2019 02:30	36.2	48.4	25.3	38.5	27
06/11/2019 02:45	37.5	48.8	35.5	38.4	36.5
06/11/2019 03:00	34	48.3	23.9	38.1	25.7
06/11/2019 03:15	27.5	41.3	23.8	28.9	25.2
06/11/2019 03:30	35	51.7	21.1	38	23.1
06/11/2019 03:45	23.6	36.6	19.1	25.5	20.7
06/11/2019 04:00	34.4	52.3	20.7	38.5	23.3
06/11/2019 04:15	30.4	50	19.9	34.3	21.4
06/11/2019 04:30	29.6	38.8	20.7	35.3	22.4
06/11/2019 04:45	28.8	43.3	22.4	31.4	24
06/11/2019 05:00	30.5	42.7	23.4	32.4	25.4
06/11/2019 05:15	58.6	66	23.7	62.7	25.8
06/11/2019 05:30	62.5	65.4	61.1	62.8	62
06/11/2019 05:45	62.2	64.2	60.7	62.6	61.7
06/11/2019 06:00	61.9	63.8	60.5	62.2	61.4
06/11/2019 06:15	61.6	63.8	60.3	62	61.2
06/11/2019 06:30	61.1	63.2	58.1	61.6	59.9
06/11/2019 06:45	52.8	64.3	40.3	56.8	44.2
06/11/2019 07:00	46.5	69.6	35.5	45.5	38.5
06/11/2019 07:15	42.3	68	33.3	41.2	35.4
06/11/2019 07:30	39.3	64.4	32.9	40.3	34.9
06/11/2019 07:45	40.6	67.6	32.2	40.5	33.8
06/11/2019 08:00	39.8	51.6	31.9	41.9	35
06/11/2019 08:15	59.1	66.3	31.6	62.8	39.8
06/11/2019 08:30	62.4	64.7	61.1	62.7	61.9
06/11/2019 08:45	62.1	64.6	60.7	62.4	61.6
06/11/2019 09:00	61.8	64.5	60.5	62.2	61.4
06/11/2019 09:15	61.6	64.4	60.5	61.9	61.2
06/11/2019 09:30	61	64	57.4	61.5	59.7
06/11/2019 09:45	51.8	62.1	41.8	55.7	44.5
06/11/2019 10:00	45.3	58.2	40.8	46.5	42.7
06/11/2019 10:15	43.3	56.2	39.2	44.6	41.1

Time	Noise Level dB				
	L _{Aeq}	L _{AFMax}	L _{AFMin}	L _{A10}	L _{A90}
06/11/2019 10:30	41.7	52.8	38.3	43.2	39.9
06/11/2019 10:45	41.9	54.9	39.3	42.9	40.3
06/11/2019 11:00	51.3	75.4	38.4	45.1	39.8
06/11/2019 11:15	58.7	75.4	39.2	62.4	40.5
06/11/2019 11:30	62.2	75.3	61	62.5	61.7
06/11/2019 11:45	61.8	64.1	60.6	62.1	61.3
06/11/2019 12:00	61.5	64.6	60.3	61.9	61.1
06/11/2019 12:15	61.2	63.5	59.9	61.6	60.8
06/11/2019 12:30	60.7	63.5	57.3	61.1	59.6
06/11/2019 12:45	52.2	63.3	37.7	56.7	42.7
06/11/2019 13:00	41	52	33.2	43.3	36.7
06/11/2019 13:15	39	50.7	31.4	43	34.5
06/11/2019 13:30	35.4	51.7	29.1	37.6	31.8
06/11/2019 13:45	34.3	50.3	28.2	37	30.3
06/11/2019 14:00	39.2	64.5	28.5	39	31.5
06/11/2019 14:15	58.7	65.7	28.9	62.5	31.8
06/11/2019 14:30	62.2	64.9	60.9	62.5	61.7
06/11/2019 14:45	61.9	63.8	60.7	62.2	61.4
06/11/2019 15:00	62.2	75	60.4	62.1	61.1
06/11/2019 15:15	61.3	63.5	60.2	61.6	60.9
06/11/2019 15:30	60.9	62.9	57.6	61.4	59.6
06/11/2019 15:45	51.7	63.4	41.2	56	44.2
06/11/2019 16:00	45.5	58.3	39.3	47.4	40.9
06/11/2019 16:15	42.9	54.2	39.6	44.1	41.5
06/11/2019 16:30	43.3	52.2	39.5	44.7	41.3
06/11/2019 16:45	43.7	54	39.7	45.3	41.6
06/11/2019 17:00	44	55	40.7	45.3	42.1
06/11/2019 17:15	58.6	65.3	40.9	62.6	42.8
06/11/2019 17:30	63.1	65.1	62	63.4	62.6
06/11/2019 17:45	62.9	64.5	61.8	63.2	62.5
06/11/2019 18:00	62.7	64.1	61.7	63	62.3
06/11/2019 18:15	62.6	65.4	61.4	62.9	62.1
06/11/2019 18:30	62.3	64	61.2	62.6	61.8
06/11/2019 18:45	62	64.5	60.8	62.4	61.6
06/11/2019 19:00	61.7	64.1	60.6	62	61.3
06/11/2019 19:15	61.4	62.8	60.4	61.7	61
06/11/2019 19:30	58.3	62.4	44.7	61.2	49
06/11/2019 19:45	44.1	52.5	37.4	46.5	40.9
06/11/2019 20:00	40.8	51.2	34.3	42.7	37.6
06/11/2019 20:15	58.9	65.2	34.9	62.7	38.2
06/11/2019 20:30	62.4	64.5	61.2	62.7	61.9
06/11/2019 20:45	62.2	65.3	61	62.5	61.6
06/11/2019 21:00	61.8	63.5	60.6	62.1	61.4
06/11/2019 21:15	61.6	63.2	60.4	61.9	61.1

Time	Noise Level dB				
	L _{Aeq}	L _{AFMax}	L _{AFMin}	L _{A10}	L _{A90}
06/11/2019 21:30	61.1	62.8	57.8	61.6	60.6
06/11/2019 21:45	53.3	63	41.9	57.7	45.8
06/11/2019 22:00	46.3	58.7	41.6	47	43.7
06/11/2019 22:15	43.4	50.8	39.7	45.4	41.1
06/11/2019 22:30	41.8	50.2	37.7	43.1	39.9
06/11/2019 22:45	42.4	48.4	37.8	43.8	39.9
06/11/2019 23:00	42.4	55.5	38	43.3	39.8
06/11/2019 23:15	58.4	67	38.3	62.4	39.6
06/11/2019 23:30	63	64.8	61.8	63.3	62.6
06/11/2019 23:45	62.9	66.6	61.8	63.2	62.5
07/11/2019 00:00	62.7	65.2	61.6	63.1	62.3
07/11/2019 00:15	62.6	65.2	61.4	62.9	62.1
07/11/2019 00:30	62.3	64.1	61.1	62.7	61.9
07/11/2019 00:45	62	64	60.6	62.3	61.5
07/11/2019 01:00	61.7	63.7	60.7	62.1	61.3
07/11/2019 01:15	61.4	63.1	60.3	61.8	61
07/11/2019 01:30	60.6	65	53.4	61.4	58
07/11/2019 01:45	48.7	57.5	37.3	52.7	41.7
07/11/2019 02:00	43	55.6	33.6	45.9	38.1
07/11/2019 02:15	40.7	53.6	33.2	43.1	36.6
07/11/2019 02:30	44.4	59.9	36.5	46.8	39.4
07/11/2019 02:45	43.6	57.5	37.7	46.7	39.3
07/11/2019 03:00	46.4	60.1	36.6	50	39.1
07/11/2019 03:15	42.8	55.5	32.3	46.7	35.1
07/11/2019 03:30	41.9	55.9	33.7	44.9	36.5
07/11/2019 03:45	44.1	54.5	33.9	47.4	36.9
07/11/2019 04:00	44.9	58.9	33.8	48.1	37.8
07/11/2019 04:15	43.7	54.4	32.8	47.4	36.4
07/11/2019 04:30	43.2	57.6	32.5	45.6	36.1
07/11/2019 04:45	40.2	52	32.3	43.3	35.3
07/11/2019 05:00	44.8	58.7	35	47.6	37.6
07/11/2019 05:15	58.6	65.7	37.4	62.6	40.6
07/11/2019 05:30	62.5	64.5	61.2	62.9	62
07/11/2019 05:45	62.1	64.3	60.9	62.5	61.6
07/11/2019 06:00	61.9	64.3	60.5	62.2	61.4
07/11/2019 06:15	61.6	64.4	60.4	61.9	61.1
07/11/2019 06:30	61.2	66.2	58	61.7	60.6
07/11/2019 06:45	54.3	65	46.3	57.7	48.9
07/11/2019 07:00	54.2	66.7	46.3	57.6	48.9
07/11/2019 07:15	52.4	64.6	45.8	55.1	48.1
07/11/2019 07:30	48.5	60.2	44.6	49.9	46.7
07/11/2019 07:45	48.4	59.6	44.7	49.8	46.6
07/11/2019 08:00	48.4	59.2	44.9	49.7	46.7
07/11/2019 08:15	59.4	67.7	44.6	63.1	46.1

Time	Noise Level dB				
	L _{Aeq}	L _{AFMax}	L _{AFMin}	L _{A10}	L _{A90}
07/11/2019 08:30	63.5	83.8	62.1	63.7	62.9
07/11/2019 08:45	63.1	64.5	61.9	63.4	62.6
07/11/2019 09:00	62.9	75	61.8	63.2	62.5
07/11/2019 09:15	63.3	83.1	61.6	63.1	62.3
07/11/2019 09:30	62.6	72.5	61.4	62.9	62.1
07/11/2019 09:45	62.2	64.6	60.8	62.6	61.8
07/11/2019 10:00	61.6	64.1	54.8	62.1	61.1
07/11/2019 10:15	47.8	67.5	43.1	48.4	44.7
07/11/2019 10:30	48.6	71.8	42	46.8	43.2
07/11/2019 10:45	45.4	57.1	41.1	46.6	43.5
07/11/2019 11:00	43.9	63.8	40.8	44.5	42.5
07/11/2019 11:15	58	65.7	40.9	62.6	42.6
07/11/2019 11:30	63.2	65.1	62.1	63.6	62.8
07/11/2019 11:45	63	64.6	61.8	63.3	62.6
07/11/2019 12:00	63	65.9	61.9	63.3	62.5
07/11/2019 12:15	62.7	64.9	61.5	63.1	62.3
07/11/2019 12:30	62.5	63.8	61.2	62.8	62
07/11/2019 12:45	62.2	65.9	61	62.5	61.7
07/11/2019 13:00	61.9	65	60.6	62.2	61.4

APPENDIX B

PROPOSED SITE LAYOUT



MAIN SITE PLAN

KEY SITE ELEMENTS

- Site boundary
- Existing trees
- Proposed trees and shrubs/hedges
- Vehicle & PTW parking
- Footway (adoptable)
- Footway
- Cycle store (apmts)
- Bin collection points
- Minor access road
- Raised platform junction
- Shared surface road
- Shared driveway
- Individual plots
- Speed bump
- Swale
- Pedestrian access
- Vehicular access
- 2m height closeboarded wooden fence (varied designs)
- 1m height fence to include: iron railings, picket, wood panels, some with brick piers at gates.

KEY PROPERTY TYPES

- 4nr Wilby SF 1 bed FF 2 bed GF 3 bed apartments
- 1nr single garage
- 1nr Deben 3 bed detached house
- 2nr Easton 5 bed detached house
- Woodbridge 8nr 5 bed detached house
- Framlingham 6 nr 3 bed detached house
- 6nr Bealings FF/SF 3 bed GF 2 bed maisonettes
- 4nr Glemham 3 bed (N) 4 bed (S) semi-detached houses
- 5nr double garage
- 5nr Sudbury SF 2 bed FF 2 bed GF 1 bed apartments
- Bramfield 1nr 3 bed detached house

Designed by:

CAPITAL COMMUNITY DEVELOPMENTS LTD
 30 Gardena Close, Rendlesham, Suffolk IP12 2GX
 T: 01394 420936 • E: enquiries@ccdevelopments.co.uk

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Drawing based on CCD dwg: 84 SP / P rev E,
 re-presented by:

Revision	Description	XX	XX	XX	XX
Number	By	Date			

thelandscapepartnership
 planning and designing environments for life

Project	Area 8 Rendlesham
Drawing	Site plan
Status	Planning
Job No.	E18836
Dwg. No.	E18836-001
Scale	1:500@A1
Drawn	LH
Checked	SN
Date	05-04-2019
North	(magnetic)

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APPENDIX C

ACOUSTIC TERMINOLOGY

Acoustic Terminology

- C1 Noise, defined as unwanted sound, is measured in units of decibels, dB. The range of audible sounds is from 0 dB to 140 dB. Two equal sources of sound, if added together will result in an increase in level of 3 dB, i.e. $50 \text{ dB} + 50 \text{ dB} = 53 \text{ dB}$. Increases in continuous sound are perceived in the following manner:
- 1 dB increase - barely perceptible.
 - 3 dB increase - just noticeable.
 - 10 dB increase - perceived as twice as loud.
- C2 Frequency (or pitch) of sound is measured in units of Hertz. 1 Hertz (Hz) = 1 cycle/second. The range of frequencies audible to the human ear is around 20Hz to 18000Hz (or 18kHz). The capability of a person to hear higher frequencies will reduce with age. The ear is more sensitive to medium frequency than high or low frequencies.
- C3 To take account of the varying sensitivity of people to different frequencies a weighting scale has been universally adopted called "A-weighting". The measuring equipment has the ability automatically to weight (or filter) a sound to this A scale so that the sound level it measures best correlates to the subjective response of a person. The unit of measurement thus becomes dBA (decibel, A-weighted).
- C4 The second important characteristic of sound is amplitude or level. Two units are used to express level, a) sound power level - L_w and b) sound pressure level - L_p . Sound power level is an inherent property of a source whilst sound pressure level is dependent on surroundings/distance/directivity, etc. The sound level that is measured on a meter is the sound pressure level, L_p .
- C5 External sound levels are rarely steady but rise or fall in response to the activity in the area - cars, voices, planes, birdsong, etc. A person's subjective response to different noises has been found to vary dependent on the type and temporal distribution of a particular type of noise. A set of statistical indices have been developed for the subjective response to these different noise sources.
- C6 The main noise indices in use in the UK are:
- L_{A90} : The sound level (in dBA) exceeded for 90% of the time. This level gives an indication of the sound level during the quieter periods of time in any given sample. It is used to describe the "background sound level" of an area.
 - L_{Aeq} : The equivalent continuous sound level in dBA. This unit may be described as "the notional steady noise level that would provide, over a period, the same energy as the intermittent noise". In other words, the energy average level. This unit is now used to measure a wide variety of different types of noise of an industrial or commercial nature, as well as aircraft and trains.

L_{A10} : The sound level (in dBA) exceeded for 10% of the time. This level gives an indication of the sound level during the noisier periods of time in any given sample. It has been used over many years to measure and assess road traffic noise.

$L_{A\text{MAX}}$ The maximum level of sound measured in any given period. This unit is used to measure and assess transient noises, i.e. gun shots, individual vehicles, etc.

- C7 The sound energy of a transient event may be described by a term SEL - Sound Exposure Level. This is the L_{Aeq} level normalised to one second. That is the constant level in dBA which lasting for one second has the same amount of acoustic energy as a given A weighted noise event lasting for a period of time. The use of this unit allows the prediction of the L_{Aeq} level over any period and for any number of events using the equation;

$$L_{AeqT} = SEL + 10 \log n - 10 \log T \text{ dB.}$$

Where

n = Number of events in time period T.

T = Total sample period in seconds.

- C8 In the open, known as free field, sound attenuates at a rate of 6 dB per each doubling of distance. This is known as geometric spreading or sometimes referred to as the Inverse Square Law. As noise is measured on a Logarithmic scale, this attenuation in distance = $20 \log$ (ratio of distances), e.g. for a noise level of 60 dB at ten metres, the corresponding level at 160 metres is:

$$60 - 20 \log \frac{160}{10} = 60 - 24 = 36 \text{ dB}$$

Appendix X x

Steven Bainbridge

Subject: FW: Noise mitigation vs. trees

From: [REDACTED]
Sent: 27 November 2019 16:36
To: Steven Bainbridge <steven@parkerplanningservices.co.uk>
Cc: 'Anthony Hardy' <[REDACTED]>; 'Jeanie' <[REDACTED]>
Subject: RE: Noise mitigation vs. trees

Dear Stephen,

There are a number of trees immediately adjacent to the red line and I would recommend that the toe of the bund be offset 1m into the site and that the bund should be 2.5-3m high and would occupy the remainder of the 9m strip (i.e. to accommodate a manageable gradient). The fence would then make up the remainder of the required 5m height as you suggest.

The bund will be formed over root protection areas of trees bordering the site as shown on the tree survey drawing and it will be necessary to ensure that the RPA is not disturbed by compaction or excavation. This can be achieved by laying a protective layer beneath the bund – eg 150mm of inert granular fill, laid over existing ground, between two layers of geotextile, thereby providing protection from compaction whilst allowing gaseous exchange to continue at existing ground levels beneath the bund.

Given this, the bund can be accommodated with no significant impact on trees. It may also not be necessary to apply the ground protection treatment to the whole of the theoretical RPA – i.e. areas that were regularly ploughed until recently are unlikely to require protection – this would need verification on site.

Kind regards

Giles

Appendix X xi

Forest Gardens Rendlesham

'Back to front' layout

Planning – Application Summary

[Help with this page](#)

C/02/0433 | Development of Plot A including construction of 25 residential units & associated works | New Rendlesham Village Centre Off Suffolk Drive Rendlesham

★ Track

Print

Details Comments (0) Constraints (0) Related Cases (29) Documents and Comments Map

Summary Further Information Contacts Important Dates

Reference	C/02/0433
Application Received	Sun 03 Feb 2013
Application Validated	Tue 02 Apr 2002
Address	New Rendlesham Village Centre Off Suffolk Drive Rendlesham
Proposal	Development of Plot A including construction of 25 residential units & associated works
Status	Permitted
Decision	Application Permitted
Decision Issued Date	Mon 02 Jun 2003
Appeal Status	Unknown
Appeal Decision	Not Available

<p>Planning & Leisure J.G. Schofield, B.A. (Hons), M.C.D., M.R.T.P. Director of Planning & Leisure Midway Hill, Woodbridge, Suffolk IP12 1AU Tel: (01394) 383789 Fax: (01394) 385100 Website: www.suffolkcoastal.gov.uk DX: Woodbridge 61400 Minsmere: (01394) 444211</p> <p>Last & Tricker Partnership 3 Lower Brook Mews Lower Brook Street IPSWICH Suffolk IP4 1RA</p> <p>PLANNING PERMISSION</p> <p>Please record in the Register of Local Land Charges</p> <p>Town/Parish: Rendlesham Date of Application: 13 March 2002 Applicant: Suncoast Property Development Application No: C02/0433</p> <p>Proposal: Development of Plot A including construction of 25 residential units & associated works</p> <p>Location: New Rendlesham Village Centre, Off Suffolk Drive, Rendlesham</p> <p>Permission is hereby granted by the SUFFOLK COASTAL DISTRICT COUNCIL as local planning authority for the purposes of the TOWN AND COUNTRY PLANNING ACT 1990 for development in accordance with the application shown above, subject to the development being carried out in accordance with the plan(s) and information contained in the application, and to the following conditions and reasons:</p> <p>APPROVED PLANS: 16 Revision C, received 25/04/03 (Block) 29 received 25/04/03 (walling) Materials Schedule – letter received 16/04/03 7 Revision A, received 05/09/02 (Plots 1 – 4) 8 Revision A, received 05/09/02 (Plots 5 – 10) 9 Revision A, received 05/09/02 (Plots 11 – 16) 10 Revision A, received 05/09/02 (Plots 11 – 16) 6 Rev B, received 16/04/03 (Plot 17) 11 Rev C, received 16/04/03 (Plots 18, 19, 22, 23, 24 & 25) 28 received 16/04/03 (Plots 22 & 23) 12 Rev A, received 05/09/03 (Plots 20 – 21)</p> <p>contd</p>	<p>COMMONS AND REASONS:</p> <p>C02/0433</p> <ol style="list-style-type: none">1. Within 6 months of the commencement of the construction of the dwellings hereby approved a Landscape Management Plan for the amenity areas and Public Open Space as required by Condition 14 of the Outline Permission shall be submitted to and approved in writing by the local planning authority for the area of open space to be developed by the Council (or others). The Landscape Management Plan shall include details of planting and maintenance (for 20 years) and indicate a time scale for the agreed procedures as well as dates for implementation timescales/carrying out the agreed works. Reason: To ensure the submission and implementation of a well-laid out scheme of landscaping in the interest of visual amenity.2. After work on the development is commenced precise details of any gate, wall, fence or other means of linking or boundary feature to be erected on the site shall be submitted to and approved by the Council. The approved means of enclosure shall be erected prior to the occupation of the dwellings to which they relate, to the Council's reasonable satisfaction. Reason: In the interests of amenity: the application did not include the necessary details for consideration.3. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 [or any Order revoking or re-enacting the said Order] no new windows or openings shall be inserted/added into the following elevations at first floor level and at 2nd floor level where applicable) unless otherwise agreed in writing with the local planning authority:- (i) Plot 5 North - east elevation (ii) Plot 7 North - west elevation (iii) Plot 10 North - west elevation (iv) Plot 13 South - east elevation (v) Plot 22 South - west elevation Reason: To avoid the possibility of unacceptable loss of privacy to neighbouring properties.4. The first-floor and 2nd floor windows on the north-west elevation of plot 10 shall be obscure glazed and thereafter retained as such unless otherwise agreed in writing by the local planning authority. Reason: To avoid the possibility of unacceptable loss of privacy to neighbouring properties.5. All external joinery shall be of painted timber or white UPVC, unless otherwise agreed in writing by the local planning authority. Reason: To ensure the satisfactory appearance of the development in the interests of visual amenity. <p>Informations</p> <ol style="list-style-type: none">1. In determining this application the local planning authority has had regard to the following Policies of the Local Plan: AP19, AP36, AP40, AP160 & AP17. <p>contd</p>
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