

# RENDESHAM NEIGHBOURHOOD PLAN CONSULTATION REPRESENTATIONS ON BEHALF OF WALNUT TREE PROPERTY LTD

## INTRODUCTION

- 1.1 These representations are submitted in response to the publication of the Rendlesham Neighbourhood Plan (September 2014) which has been submitted to Suffolk Coastal District Council (SCDC). They are made on behalf of Walnut Tree Property Ltd, who have an interest in land at Rendlesham.
- 1.2 Representations on the first and second submission Neighbourhood Plan have previously been formally submitted. Some of the comments and suggestions have been taken into account. However, those points that have not been considered, plus some additional comments, are stated in these representations where it is felt appropriate.
- 1.3 These representations focus on matters included in the Rendlesham Neighbourhood Plan (RNP) that relate to its conformity with the National Planning Policy Framework (2012) and Suffolk Coastal District Council's Local Plan (2013).
- 1.4 Overall, it is considered the RNP still does not conform with both national and local policy. It is therefore considered to be "unsound".

## PLANNING POLICY

### *National Planning Policy Framework (NPPF)*

- 1.5 National policy has a requirement that "Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan and Neighbourhood Plans should reflect these policies and plan positively to support them" (NPPF 2012, pg.44).
- 1.6 National policy states "Neighbourhood Plans should not promote less development than set out in the local plan" (NPPF 2012, pg.44).
- 1.7 The NPPF expresses that "every effort should be made objectively to identify and then meet the housing, business and other development needs of an area."
- 1.8 The NPPF also expresses that "pursuing sustainable development requires careful attention to viability and decision-taking. Plans should be deliverable. Sites and the scale of development identified in the plan should not be subject to such scale of obligations and policy burdens that their ability to be developed viably is threatened." (NPPF, 2012, pg.41).

*Suffolk Coastal District Council Adopted Core Strategy*

- 1.9 Neighbourhood Plans must also be in conformance with plans at the local level and in this instance should be in conformance with the Council's Core Strategy adopted in July 2013.
- 1.10 A particular policy which this Neighbourhood Plan must conform with is Policy DM30 – Key Facilities:

*“The redevelopment or change of use of key facilities within rural communities and local and district centres in urban areas will be permitted where: (a) the existing use is not, or cannot be made to be financially viable, nor sold as a going concern; or (b) the local community has not come forward with a realistic proposal to assume operation of the business. The partial redevelopment or change of use of a key facility will also be permitted where this will not prejudice its viability or future operation, and subject to the other policies in the Local Plan.”*

This policy has been referred to in these representations.

**RENDELSHAM NEIGHBOURHOOD PLAN (RNP)**

- 1.11 Representations on the RNP are set out in chronological order below.

*Paragraph 4.03*

- 1.12 Both the Angel Theatre and the Sports Centre are stated in the RNP as being “Key Facilities”. It is stated *“both these buildings are recognised as Key Facilities by Suffolk Coastal District Council.”* However, as both these buildings have been vacant for some time (the Angel Theatre since 2006 and the Sports Centre since 2009), it is questioned whether they can actually be called Key Facilities as they are not currently functioning as such.
- 1.13 It must also be stated that both buildings have been the subject of vandalism and thus would incur great costs in order to get them to a Key Facilities standard. As well as this both buildings are of 1980's designs and thus are not built to the highest energy efficiency standards. Retrofitting them would incur great costs in order to bring them up to standard.

*Paragraph 4.18*

- 1.14 Under paragraph 4.18 it is stated that the playing field, hard surface multipurpose court and small pavilion were not available for full use by the community prior to the land being transferred to the Parish Council in March 2014. It is worth stating that although the completion of these assets was in 2005 there was continuous disagreement between the Parish Council and the District on the management and costs. This has resulted in a delay to the assets being taken over, despite the fact the developer was anxious to transfer the assets for the community to use.
- 1.15 It must also be noted that these facilities were not utilised and continue to be underutilised to date.

- 1.16 The wording of this paragraph is therefore incorrect and appears to be misleading. It is suggested the paragraph is rephrased to contain an accurate reflection of the situation.

#### ***SWOT Analysis – Weaknesses***

- 1.17 Within the “weaknesses” section of the SWOT Analysis it is stated: *“the Suncourt Ltd Masterplan for Rendlesham has not achieved the aspirations and expectations of the local people...while housing has increased, local facilities have been lost (the Sports Centre and the Angel Theatre).”* This is still considered to be a highly subjective view on behalf of the Parish Council. The facilities were provided and subsidised by the building’s owners for 10 years, however they were not used by the residents to a level that was justifiable or sustainable.
- 1.18 Within the weaknesses section of the SWOT Analysis it is also stated that *“facilities and opportunities within Rendlesham are not adequate for Rendlesham to be a sustainable village.”* Rendlesham is classed in the SCDC Core Strategy as being a “Key Service Centre.” In order to be classed as a Key Service Centre settlements provide an *“extensive range of specified facilities”* as well as *“being capable of accommodating more strategic levels of growth.”* As well as those listed, there are more numerous facilities found in Rendlesham, thus further showing that Rendlesham offers over and above that of other Key Service Centres. It is because of this that Rendlesham is considered to be a sustainable village, as evidenced by SCDC.

#### ***SWOT Analysis – Threats***

- 1.19 The SWOT analysis suggests a threat to Rendlesham is the *“loss of land in the district centre to uses other than leisure, educational, retail and community infrastructure”*. There is still a lack of evidence or justification provided to support this perceived threat. SCDC policy does not specify what use is permitted in the District Centre.
- 1.20 As stated in the SCDC Core Strategy Policy DM30, if the infrastructure, or key facilities that are present in the District Centre cannot be made financially viable, or the local community have not come forward with a realistic proposal to assume operation, then alternative uses will be considered. Any potential loss of land and consideration of alternative uses, would therefore be compliant with this Core Strategy policy.

#### ***Paragraph 6.05***

- 1.21 It is stated within this paragraph that the priority for the RNP should be to *“safeguard and develop the District Centre as a community resource,”* However, the RNP must be mindful that it must work within the limitations of both local and national policy.

When looking at the wording of paragraph 6.05 it is seen that it conflicts with that of local policy DM30 by only suggesting community use for the District Centre. It would appear the RNP is not able to offer this protection to the District Centre as it is not in conformity with this local policy. This

wording has the specific intention of restricting future development in the District Centre, and thus is contrary to local and national policy; both of which recognise the value of residential development within centres.

#### *Figure 14*

- 1.22 With reference to the building blocks for a sustainable Rendlesham in Figure 14, still there is disagreement as to the correct order the blocks should be placed in. The blocks which represent “*a vibrant District Centre providing infrastructure facilities*” and “*a protected village green providing public open space in the heart of the village*” should not be placed at the bottom of the Figure, as these are the result of a sustainable Rendlesham. These blocks should therefore be placed at the top. The “*site allocations*” block should be placed before the others as it is usual practice that site allocations identify these areas before any of the other aspects have been looked at. The blocks of “*transport*”, “*economic development*”, “*housing*” and “*housing design*” would follow on as a result of the site allocations.
- 1.23 It is thus suggested the blocks in Figure 14 are not in the correct order and therefore do not accurately represent a sustainable and thriving village.
- 1.24 We disagree with the order of the blocks in this diagram which gives a misleading visual representation to the reader. Therefore, it is suggested that “site allocations” and “policies” should be the foundation blocks. After which, the other blocks would follow and result in a sustainable and thriving village.

#### *Figure 16*

- 1.25 It is stated in the wording under Figure 16 that there was a wish to create many “*outstanding community facilities*” through the development of the original masterplan for Rendlesham. However the RNP states that several of these have not come to fruition. This is incorrect. Many of those stated in Figure 16 have already been provided for the residents of Rendlesham. These include: the sports centre, a theatre, a café and an extensive community centre. In the case of the Sports Centre and Angel Theatre these have subsequently been found not to be viable.
- 1.26 We therefore object to the wording of Figure 16 due to the fact it is again factually incorrect and misleading.

#### *Paragraph 8.09*

- 1.27 Within this paragraph it is stated “*the District Centre will have provision for indoor sports and leisure pursuits.*” This appears to be limiting the uses in the District Centre. Within local policy it does not limit the uses that can occur in District Centres, thus this paragraph is contrary to local policy and must be objected to.

### ***Policy RNPP1***

- 1.28 In this Neighbourhood Plan, Policy RNPP1 states *“In the Rendlesham District Centre...the redevelopment or change of use of existing or established public buildings and/or key facilities will be permitted where the redevelopment or change of use is for either leisure, education, retail or community use.”*
- 1.29 This policy is contrary to Suffolk Coastal Core Strategy Policy DM30, which does not look to limit the use key facilities can change to. The policy states *“the redevelopment or change of use of key facilities will be permitted where (a) the existing use is not, or cannot be made to be financially viable, nor sold as a going concern; or (b) the local community has not come forward with a realistic proposal to assume operation of the business.”*
- 1.30 We therefore strongly object to the additional wording of Policy RNPP1 as it seeks to go beyond Core Strategy Policy DM30 to restrict potential uses.

### ***Paragraph 9.24***

- 1.31 This paragraph states the facilities and clubs in Rendlesham would not only serve the village, but also a much wider area of within *“a 10 – 15 mile radius at a minimum as provision of these activities is non-existent or limited.”* In Figure 33 it can be seen there are 11 sports halls in the surrounding towns and villages. These are within the 10-15 mile radius from Rendlesham. Therefore, there is already extensive provision in the surrounding area and the facilities in Rendlesham do not need to serve the wider area suggested.
- 1.32 It must also be stated that in both paragraph 9.24 and paragraph 9.31 the reference to Rendlesham’s facilities serving a 10-15 mile radius is extreme. The catchment area suggested is much wider than would be expected for a Key Service Centre. This radius would encompass Ipswich to the West, Felixstowe to the South, Aldeburgh to the East and Saxmundham to the North. These larger areas have facilities of their own and it would be unrealistic to think people would travel to Rendlesham in order to use the facilities there.
- 1.33 There would also be related car parking and traffic issues associated with competing and attracting more people to the village. This has been seen on a few occasions in the past when the facilities were near to capacity and resulted in many complaints from residents living in the District Centre. However, in order to be sustainable the facilities would have to operate at full capacity, incurring traffic and parking problems.
- 1.34 We suggest this paragraph is revised to a smaller radius, which is more realistic and sustainable for the village and its size.

*Paragraph 13.01*

- 1.35 This paragraph states “*the district centre should be the primary location for the four priority areas of economic growth: 1) shops and services, 2) leisure activities, 3) hotels/pubs/restaurants/cafes/takeaways, 4) commercial business.*” There are many uses that have been identified as priorities, however residential use is excluded. This paragraph therefore contradicts SCDC Core Strategy policy DM30 which does not limit uses in District Centres.

**CONCLUSION**

- 1.36 As a starting principle the Rendlesham Neighbourhood Plan must be in conformance with national and local policy.
- 1.37 There still remains many areas of the RNP that contain inaccurate and misleading information and do not conform with national and local policy.
- 1.38 There appears to be a strong desire to protect the District Centre, however the policies put in place for this are contrary to both national and local policy.
- 1.39 By stating that Rendlesham’s facilities ‘*would serve a much wider area, potentially with a 10-15 mile radius at a minimum,*’ this appears to be much wider that would be expected in a village of Rendlesham’s size, as well as the fact there are numerous sports facilities within the District. It also brings into question whether the village would be able to cope with an increase in traffic and car parking when the facilities would potentially be in use. It is considered that an area considerably less than the “10-15 mile radius” catchment stated in the RNP would be more suitable and realistic.
- 1.40 It is thought that the methods being suggested to protect the District Centre above everything else, is flawed and does not promote “sustainable development” or a “sustainable neighbourhood”. The approach put forward by the Rendlesham Neighbourhood Plan is therefore “unsound.”
- 1.41 In order for this document to become adopted policy it must be supported by evidence and justified. Therefore, the policies to protect the retention of redundant buildings in the district centre for community and sports use are not supported by any substantive evidence and thus not justified.
- 1.42 By amending the points mentioned in the above document, it should help to ensure the Neighbourhood Plan is a more robust document for Rendlesham to submit to the Planning Inspector.
- 1.43 Overall, Boyer Planning on behalf of Walnut Tree Property Ltd **object** to the Rendlesham Neighbourhood Plan as it is “unsound.”