



March 2019

## Planning, Design & Access Statement

Land off Garden Square,  
Rendlesham

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# 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.

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**Report Revision:1**

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## **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 houses<sup>1</sup> 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.

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<sup>1</sup> 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.

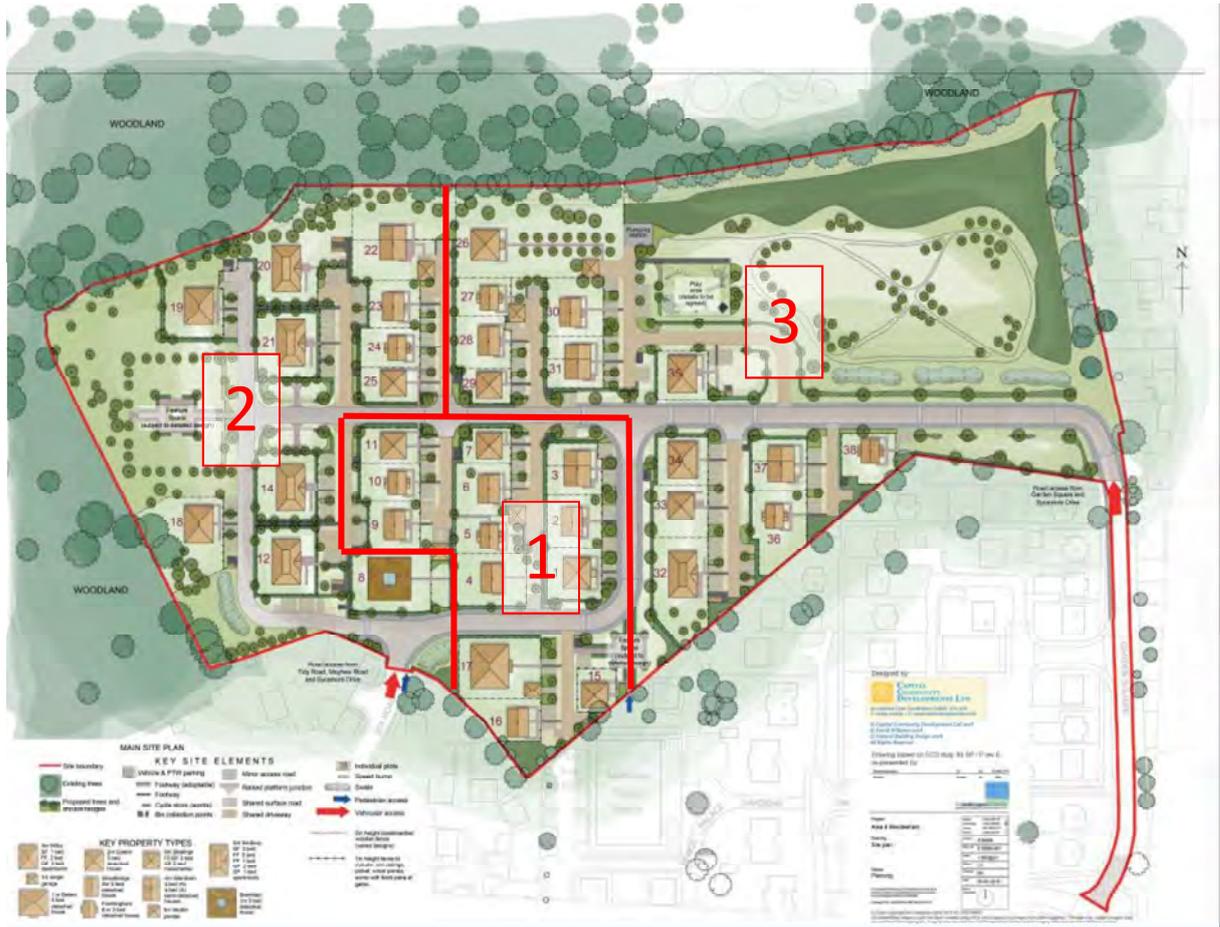


- 2.3 The site is relatively flat and bounded by woodland on the north and west boundaries and residential development on the east and south. Further to the north, beyond the woodland, the main land use is agricultural. Just to the north of the site is the sewage treatment plant which imposes a cordon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



2.5 The erection of the dwellings is intended to be undertaken in three phases over three years and approximately 25 units per year. The phases are:

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



2.6 The infrastructure will be phased dependant on detailed discussions with the local planning authority.

### **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 13<sup>th</sup> 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 19<sup>th</sup> 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.

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**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):

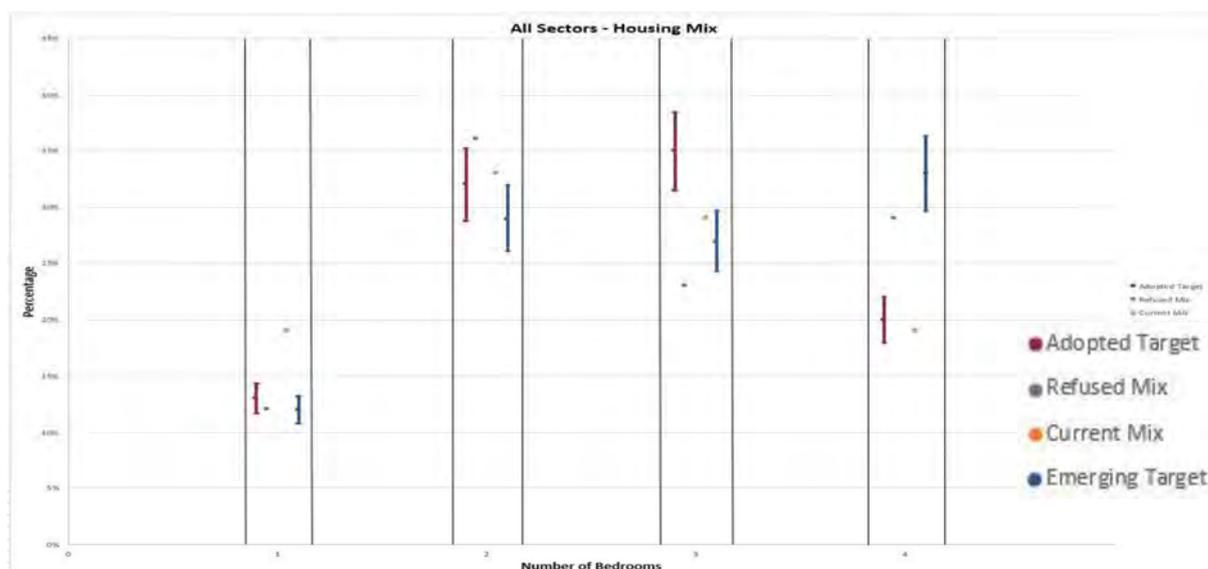
Bedrooms	1	2	3	4+
Open Market Housing	0% (6%)	59% (32%)	100% (39%)	100% (22%)
Affordable housing	100% (43%)	41% (31%)	0% (16%)	0% (11%)
<b>All sectors</b>	<b>12% (13%)</b>	<b>36% (32%)</b>	<b>23% (35%)</b>	<b>29% (20%)</b>

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%)
<b>All Sectors</b>	<b>19% (13%)</b>	<b>33% (32%)</b>	<b>29% (35%)</b>	<b>19% (20%)</b>

(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**

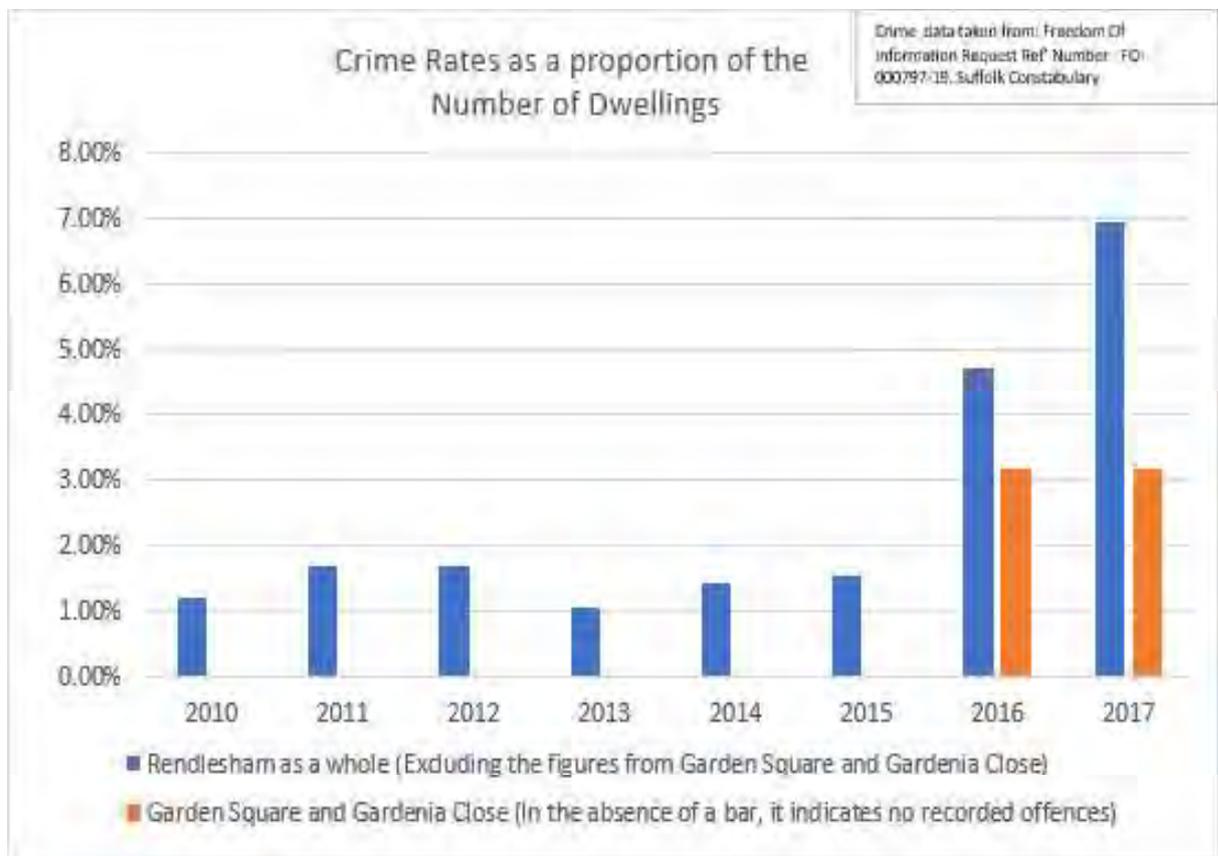
- 3.31 The fourth reason for refusal centred on affordable housing and stated (incorrectly) that 24% affordable housing was being offered and that none would be made available for specific local affordable housing needs. The first incorrect point was clarified by the applicants by email (31<sup>st</sup> July) one week after the public consultation period had ended (24<sup>th</sup> 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
<b>Rendlesham as a whole (Excluding the figures from Garden Square and Gardenia Close)</b>	Total Number of Crimes	15	21	21	13	18	19	59	87
	Number of Dwellings <sup>1</sup>	1250	1250	1250	1250	1250	1250	1250	1250
	%	1.20%	1.68%	1.68%	1.04%	1.44%	1.52%	4.72%	6.96%
<b>Garden Square and Gardenia Close (In the absence of a bar, it indicates no recorded offences)</b>	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%
<b>Total Number of Crimes</b>		<b>15</b>	<b>21</b>	<b>21</b>	<b>13</b>	<b>18</b>	<b>19</b>	<b>61</b>	<b>89</b>

<sup>1</sup> 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.

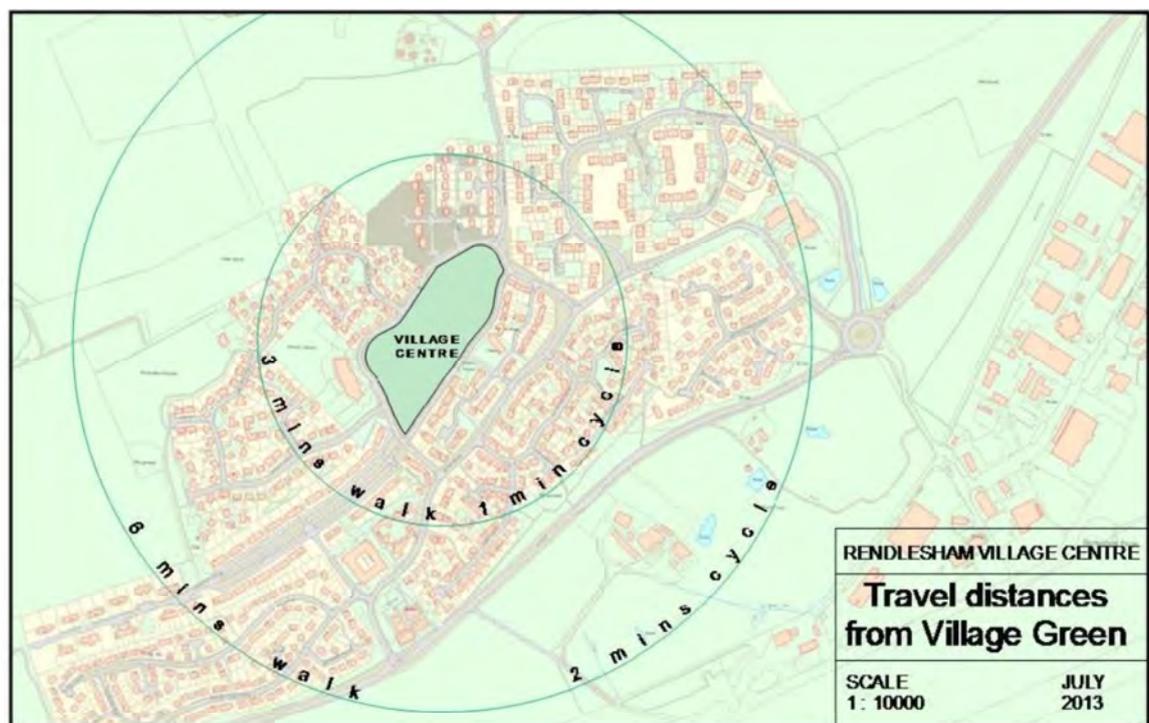


Figure 29 from the Rendlesham Neighbourhood Plan.

## **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.

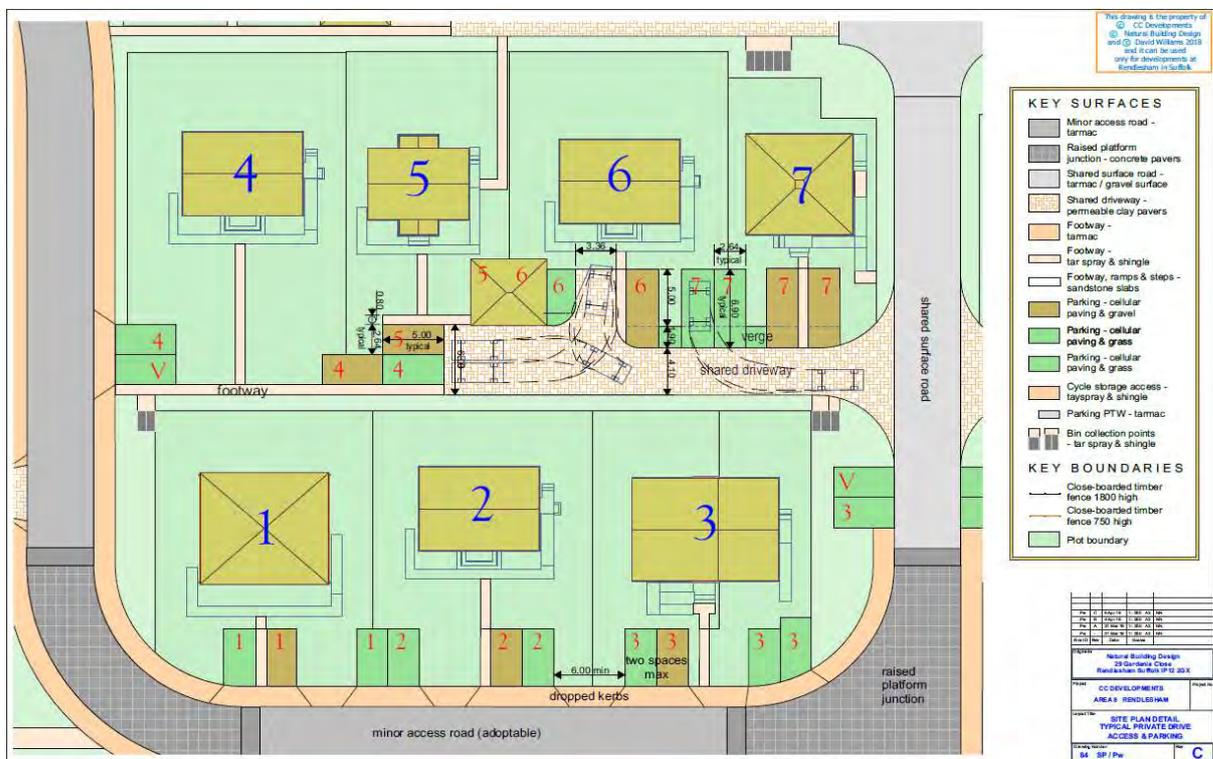
- 6.23 Strategic Policy SP12 Climate Change states that “the district council will contribute towards mitigating climate change by ensuring development minimises the use of natural resources by utilising recycled materials where appropriate, minimises greenhouse gas emissions, incorporates energy efficiency, 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.

<b>Policy</b>	<b>Name/Description</b>	<b>Compliant y/n?</b>
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 growth 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**

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Melton  
Woodbridge  
IP12 1RT  
(Sent Via Email)

**Contact:** Mr. Jason Parker  
**Phone:** 01284 336348  
**Email:** [jason@parkerplanningservices.co.uk](mailto: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@eastssuffolk.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@eastssuffolk.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@eastssuffolk.gov.uk  
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## **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 23<sup>rd</sup> 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%



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Meeting of 11<sup>th</sup> 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-amble 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 13<sup>th</sup> 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 21<sup>st</sup> 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](http://www.eastsuffolk.gov.uk)



Part 1  
pre-app

**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@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**

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](mailto:steven@parkerplanningservices.co.uk)



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**From:** Jane Rodens <Jane.Rodens@eastsoffolk.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 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 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 to 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.

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**From:** [steven@parkerplanningservices.co.uk](mailto: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 2<sup>nd</sup> 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](mailto:steven@parkerplanningservices.co.uk)



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**From:** Jane Rodens <[Jane.Rodens@eastsoffolk.gov.uk](mailto:Jane.Rodens@eastsoffolk.gov.uk)>  
**Sent:** 15 January 2019 14:03  
**To:** 'steven@parkerplanningservices.co.uk' <[steven@parkerplanningservices.co.uk](mailto: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) [<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](mailto:steven@parkerplanningservices.co.uk)



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

**Sent:** 10 January 2019 16:30

**To:** 'Jane Rodens' <[Jane.Rodens@eastsuffolk.gov.uk](mailto: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](mailto:steven@parkerplanningservices.co.uk)



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

**Sent:** 19 December 2018 11:31

**To:** 'Jane Rodens' <[Jane.Rodens@eastsoffolk.gov.uk](mailto:Jane.Rodens@eastsoffolk.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](mailto:steven@parkerplanningservices.co.uk)

Parker Planning Services Ltd will be closed for the Christmas Holidays from 21<sup>st</sup> 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@eastsoffolk.gov.uk](mailto:Jane.Rodens@eastsoffolk.gov.uk)>

**Sent:** 19 December 2018 11:20

**To:** 'steven@parkerplanningservices.co.uk' <[steven@parkerplanningservices.co.uk](mailto: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) [<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 13<sup>th</sup> 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 21<sup>st</sup> 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@eastsoffolk.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) [<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](mailto:steven@parkerplanningservices.co.uk)



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**From:** Jane Rodens <[Jane.Rodens@eastsoffolk.gov.uk](mailto:Jane.Rodens@eastsoffolk.gov.uk)>  
**Sent:** 07 February 2019 10:15  
**To:** 'steven@parkerplanningservices.co.uk' <[steven@parkerplanningservices.co.uk](mailto: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) [<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

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**From:** [steven@parkerplanningservices.co.uk](mailto:steven@parkerplanningservices.co.uk) <[steven@parkerplanningservices.co.uk](mailto:steven@parkerplanningservices.co.uk)>  
**Sent:** 31 January 2019 21:21  
**To:** 'Jane Rodens' <[Jane.Rodens@eastsoffolk.gov.uk](mailto:Jane.Rodens@eastsoffolk.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 2<sup>nd</sup> part please?

Regards,



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

[steven@parkerplanningservices.co.uk](mailto:steven@parkerplanningservices.co.uk)



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**From:** Jane Rodens <[Jane.Rodens@eastsoffolk.gov.uk](mailto:Jane.Rodens@eastsoffolk.gov.uk)>

**Sent:** 29 January 2019 14:11

**To:** 'steven@parkerplanningservices.co.uk' <[steven@parkerplanningservices.co.uk](mailto:steven@parkerplanningservices.co.uk)>

**Cc:** planning <[planning@eastsoffolk.gov.uk](mailto:planning@eastsoffolk.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

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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**From:** [steven@parkerplanningservices.co.uk](mailto:steven@parkerplanningservices.co.uk) [mailto:[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 m<sup>2</sup>. The landscape buffer, the easements over the sewers, and the exclusion zone account for 18,664 m<sup>2</sup>. If we deduct this, this leave a nett developable area of 32,356 m<sup>2</sup>. 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](mailto:Clare.Dawson@baberghmidsuffolk.gov.uk)>*

*Sent: 10 January 2019 07:14*

*To: Nick Sibbett <[nick.sibbett@tlp.uk.com](mailto: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**

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](mailto:steven@parkerplanningservices.co.uk)



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**From:** Jane Rodens <[Jane.Rodens@eastsoffolk.gov.uk](mailto:Jane.Rodens@eastsoffolk.gov.uk)>

**Sent:** 22 January 2019 16:23

**To:** 'steven@parkerplanningservices.co.uk' <[steven@parkerplanningservices.co.uk](mailto: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 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

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**From:** [steven@parkerplanningservices.co.uk](mailto:steven@parkerplanningservices.co.uk) [mailto:[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 2<sup>nd</sup> 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](mailto:steven@parkerplanningservices.co.uk)



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**From:** Jane Rodens <[Jane.Rodens@eastsoffolk.gov.uk](mailto:Jane.Rodens@eastsoffolk.gov.uk)>

**Sent:** 15 January 2019 14:03

**To:** 'steven@parkerplanningservices.co.uk' <[steven@parkerplanningservices.co.uk](mailto: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) [<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](mailto:steven@parkerplanningservices.co.uk)



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**Sent:** 10 January 2019 16:30  
**To:** 'Jane Rodens' <[Jane.Rodens@eastsuffolk.gov.uk](mailto: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](mailto:steven@parkerplanningservices.co.uk)



**Norfolk Office:**

Parker Planning Services Ltd, Orchard House, Hall Lane, East Tuddenham, NR20 3LR  
Phone: 01503 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](mailto:steven@parkerplanningservices.co.uk) <[steven@parkerplanningservices.co.uk](mailto:steven@parkerplanningservices.co.uk)>

**Sent:** 19 December 2018 11:31

**To:** 'Jane Rodens' <[Jane.Rodens@eastsuffolk.gov.uk](mailto:Jane.Rodens@eastsuffolk.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](mailto:steven@parkerplanningservices.co.uk)



*Parker Planning Services Ltd will be closed for the Christmas Holidays from 5pm on 21<sup>st</sup> December - 2nd January 2019.*

*On behalf of Parker Planning Services Ltd, We would like to take this opportunity to say thank 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

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**From:** Jane Rodens <[Jane.Rodens@eastsuffolk.gov.uk](mailto:Jane.Rodens@eastsuffolk.gov.uk)>

**Sent:** 19 December 2018 11:20

**To:** 'steven@parkerplanningservices.co.uk' <[steven@parkerplanningservices.co.uk](mailto: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](http://www.eastsuffolk.gov.uk)



---

**From:** [steven@parkerplanningservices.co.uk](mailto: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 13<sup>th</sup> 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 21<sup>st</sup> 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](mailto: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 the very best for the New Year. May your Christmas go as planned!*



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

## **Appendix 2**

**steven@parkerplanningservices.co.uk**

---

**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<sup>o</sup>: 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.

<b>Offence</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
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
<b>Grand Total</b>	<b>15</b>	<b>21</b>	<b>21</b>	<b>13</b>	<b>18</b>	<b>19</b>	<b>61</b>	<b>89</b>	<b>5</b>

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
<b>Grand Total</b>		<b>2</b>	<b>2</b>

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

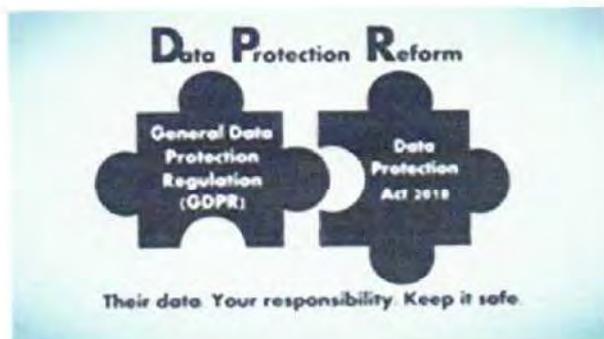
Porta) Avenue, Martlesham Heath, Ipswich

Suffolk, IP5 3QS

01473 613888 Ext 3919

[www.suffolk.police.uk](http://www.suffolk.police.uk)

[www.norfolk.police.uk](http://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](http://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](mailto:suffolkcoastallocalplan@eastsuffolk.gov.uk) / 01394 444557), and return via email to [suffolkcoastallocalplan@eastsuffolk.gov.uk](mailto: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](http://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

Title

Mr.

First Name

Anthony

Last Name

Hardy

Job Title

(where relevant)

Organisation

(where relevant)

Capital Community Developments Ltd

Address

30 Gardenia Close  
Rendlesham  
Suffolk

Postcode

IP12 2GX

Telephone  
Number

E-mail Address

### 2. Agent's Details (if applicable)

Mr.

Jason

Parker

Director / Head of Planning

Parker Planning Services Ltd

Northgate Business Centre  
10 Northgate Street  
Bury St. Edmunds  
Suffolk

IP33 1HQ

01284 336121

suffolk@parkerplanningservices.co.uk

## 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	MULTIPLE PARAS SEE ENCLOSED	Policy Number	SCLP 12.62	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.

Please see accompanying report for details.

**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.

Please see accompanying report for details.

**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:**

In order to give the Inspector the benefit of our knowledge of the site, its surroundings and extensive planning and local plan

**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 28th January 2019	Signature Mr. Jason Parker
---------------------------	-------------------------------

## **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-amble 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-amble 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-amble 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 <del>50</del> <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. <b><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></b> 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.	

<p>12.702</p>	<p>In the longer term, the village may have capacity to accommodate more than the <del>100</del> <b>125</b> homes proposed, <del>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.</del> 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. <del>The provision of a new footpath/bridleway is a condition</del> <u>has been provided as a benefit of the a</u> 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>
<p>12.703</p>	<p>Two sites are allocated for large scale housing schemes which together can provide approximately <del>100</del> <b>125</b> 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>
<p>12.704</p>	<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>	
<p>12.705</p>	<p>The site allocated as SCLP12.62 is the northern of the two sites identified on the plan above. The main <b>limiting planning</b> 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. <del>The number of homes and the area on which development could take place has therefore been reduced to approximately 50.</del></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>
<p>12.706</p>	<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"> <li>a) <del>Meet</del> <b>Reflect</b> the <del>minimum distance</del> <b>cordon sanitaire</b> from the Water Recycling Centre <del>within</del> <b>outside of</b> which new residential development is considered acceptable as advised by Anglian Water;</li> <li>b) Accommodate the sewers that cross the site;</li> <li>c) The development will need to demonstrate there is adequate capacity in the foul sewerage network or that capacity can be made available;</li> <li>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;</li> <li>e) Provision of affordable housing;</li> <li>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;</li> <li><del>g) Provision of a substantial landscape buffer to the northern and western boundaries where it abuts open countryside;</del></li> <li>h) A site-specific Flood Risk Assessment is required;</li> <li>i) Evidence is required to demonstrate there is adequate provision for treatment at the Water Recycling Centre or that this can be provided; and</li> <li>j) An archaeological assessment will be required.</li> </ul> <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>

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## 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:

<b>appendix</b>	<b>survey period</b>	<b>vehs in</b>	<b>vehs out</b>	<b>2 way flow [hgv]</b>
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 15<sup>th</sup> 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)

Page 1 of 3

**Director**

**Keith A. Berriman I.Eng., FIET, FIHE, FCIHT, CMILT**

[www.the-httc.co.uk](http://www.the-httc.co.uk)

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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,

- 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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<b>2.00</b>	<b>CONCLUSIONS.</b>	<b>7.</b>

**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 85<sup>th</sup> %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 22<sup>nd</sup> 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 22<sup>nd</sup> 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 6<sup>th</sup> February 2018).

Yours sincerely,

**Mr Ben Chester**  
**Senior Development Management Engineer**  
Strategic Development

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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**



Winner 2015  
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Award for  
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**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 6<sup>th</sup> 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 polices 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 was 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:psc  
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.  
<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' <jeanielivesley@yahoo.com>;  
'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 ONU (Registered  
Office).  
tel. 01621 818505

e-mail - kab@the-httc.co.uk  
www.the-httc.co.uk  
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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@eastssuffolk.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@eastssuffolk.gov.uk  
Suffolk Coastal and Waveney District  
Councils are working as a partnership  
and all  
emails received from us will use the  
@eastssuffolk.gov.uk email address  
www.eastssuffolk.gov.uk

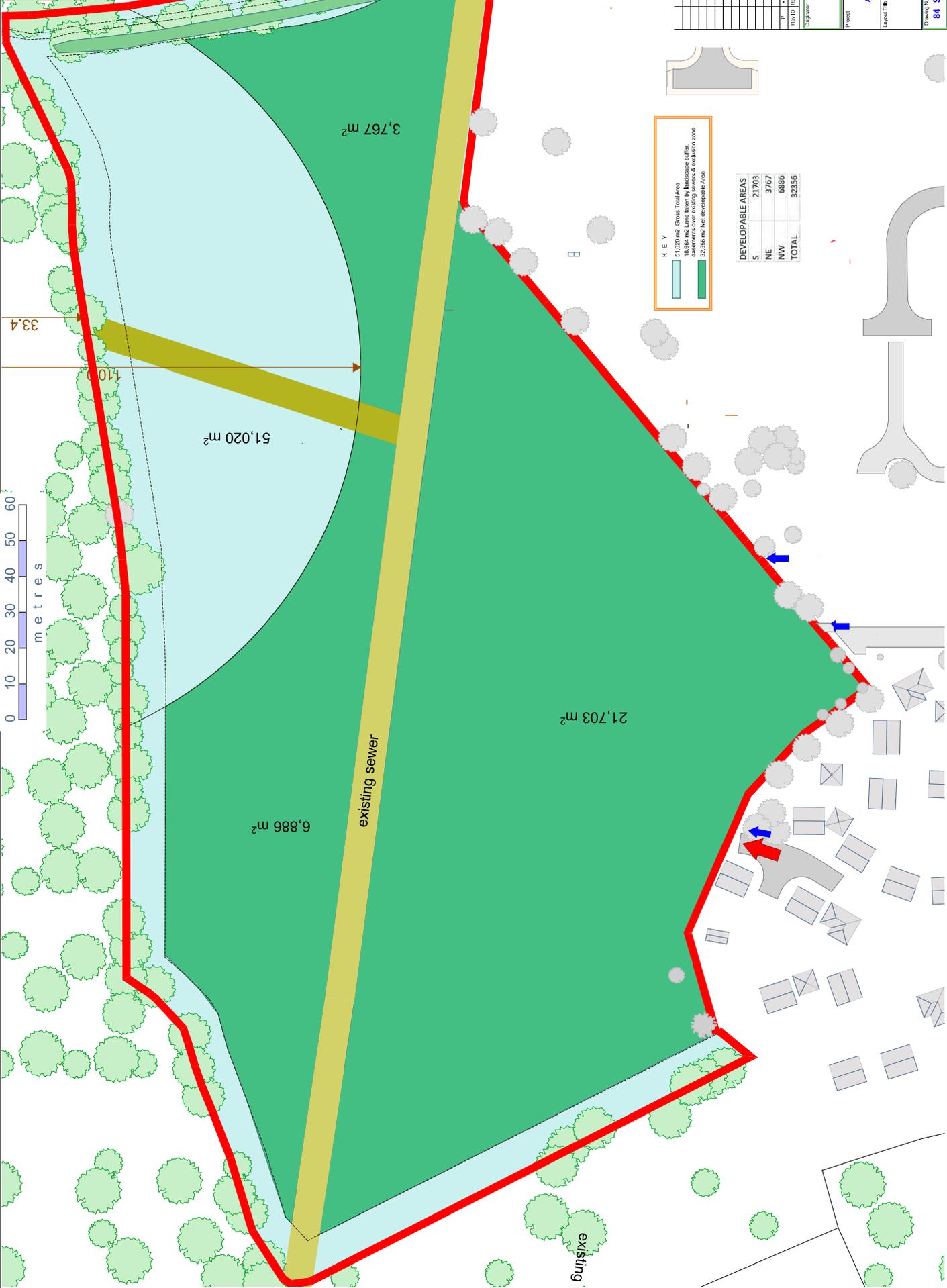
[www.twitter.com/eastsuffolk](http://www.twitter.com/eastsuffolk) |  
[www.facebook.com/eastsuffolkcouncil](http://www.facebook.com/eastsuffolkcouncil)  
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any virus, we advise that in keeping  
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recipient should ensure  
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Enclosure 5

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 and David Williams 2018  
 and it can be used  
 only for developments at  
 Rendlesham in Suffolk



**KEY**  
 51,020 m<sup>2</sup> Gross Total Area  
 10,886 m<sup>2</sup> Land taken by landscape buffer, assessments over existing sewers & exclusion zone  
 32,356 m<sup>2</sup> Net developable Area

DEVELOPABLE AREAS	
S	21703
NE	3767
NW	6886
TOTAL	32356

Rev ID	Rev	Date	Scale
1	1	10 Dec 18	1:1000 AS

Originator: Natural Building Design  
 29 Gardena Close  
 Rendlesham Suffolk IP12 2GX

Project: CC DEVELOPMENTS  
 AREA 8 - RENDELSHAM

Layout Title: SITE PLAN  
 DEVELOPABLE AREAS

Drawing Number: 84\_SP / Pa

Project No: [ ]  
 Rev: [ ]

---

Enclosure 6

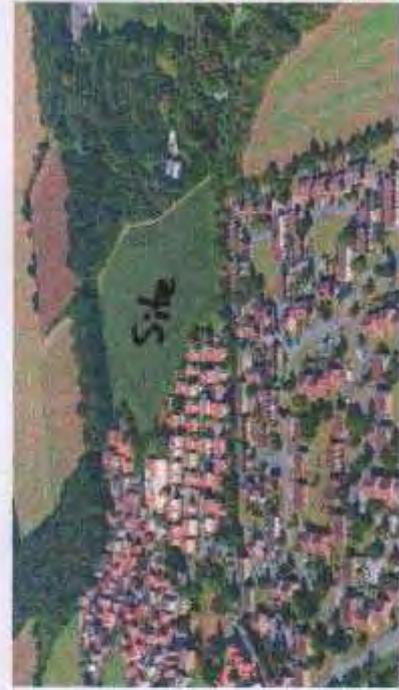
Aerial photo showing blocks of woodland west and north of site.



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

Current housing stock (Oct 14): 58,904  
 Net change in stock (Oct 14)<sup>1</sup>: 232  
 Affordable housing supply (13/14)<sup>2</sup>: 56  
 Stock of empty homes (Oct 14): 690  
 Affordability ratio (2013)<sup>4</sup>: 7.09

[Return to homepage](#)

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	<b>£79,942</b>
Upper tier	<b>£19,986</b>

### Total net additions by band, including affordable homes:

14	29	20	10	2	0	0	0	75
----	----	----	----	---	---	---	---	----

Gross affordable housing units<sup>6</sup>  
 (£350 per year premium):

25								25
----	--	--	--	--	--	--	--	----

Empty homes brought back into use<sup>5</sup>:

0	0	0	0	0	0	0	0	0
---	---	---	---	---	---	---	---	---

Traveller pitches<sup>6</sup>:

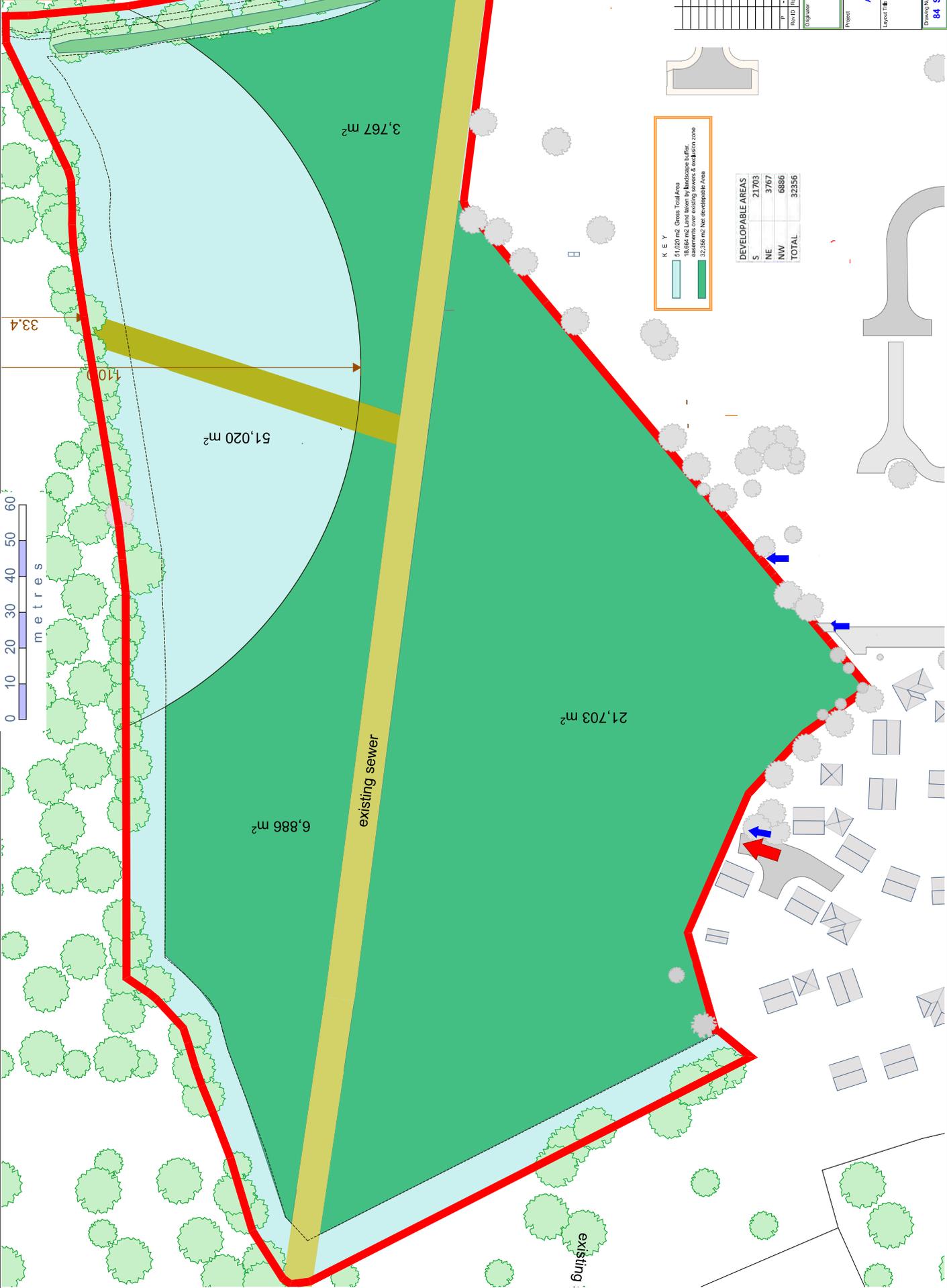
0								0
---	--	--	--	--	--	--	--	---

Total payment over 6 years:	
Lower tier	<b>£479,654</b>
Upper tier	<b>£119,913</b>

### Assumptions:

- 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-fmal-scheme-design-2>
- Data taken from the Council Tax Base form: <https://www.gov.uk/government/statistics/council-tax-base-2014-in-england>
- 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/department-for-communities-and-local-government/series/affordable-housing-supply>)
- 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>
- 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.
- 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.
- For illustration traveller pitches are assumed to be council tax level band A (and subject to the affordable homes premium).

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 Rendlesham in Suffolk



**KEY**  
 51,020 m<sup>2</sup> Grass Total Area  
 10,886 m<sup>2</sup> Land taken by landscape buffer, easements over existing sewers & exclusion zone  
 32,356 m<sup>2</sup> Net developable Area

DEVELOPABLE AREAS	
S	21703
NE	3767
NW	6886
TOTAL	32356

Rev ID	Rev	Date	Scale
1	10 Dec 18	1:1000 AS	

Originator  
 Natural Building Design  
 29 Gardena Close  
 Rendlesham Suffolk IP12 2GX

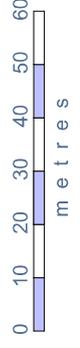
Project  
 CC DEVELOPMENTS  
 AREA 8 RENDLESHAM

Project No.  
 SITE PLAN  
 DEVELOPABLE AREAS

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 Drawing Number  
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**AREA 8**  
 Average separation between  
 dimensioned units shown  
 N-S 24 m  
 E-W 7 m

**AREA 5  
 (Garden Square)**  
 Average separation between  
 dimensioned units shown  
 N-S 25 m  
 E-W 5 m



**KEY PROPERTY TYPES**

	4nr Wilby SF 1 bed		2nr Easton 5 bed detached house		6nr Bealings FF/SF 3 bed maisonettes		5nr Suburb SF 2 bed FF 1 bed GF 2 bed GF 1 bed apartments
	1nr single garage		8nr 5 bed detached house		4nr Glemham 3 bed (N) semi-detached houses		5nr double garage
	1nr Deben 3 bed detached house		6nr 3 bed detached house		1nr 3 bed detached house		1nr 3 bed detached house

Rev	U	1	1.1000.A3	Schema N.1
Rev	C	1	1.1000.A3	Schema N.1
Rev	C	2	1.1000.A3	Schema N.1
Rev	B	1	1.1000.A3	Schema N.1
Rev	A	1	1.1000.A3	Schema L.1
Rev	A	2	1.1000.A3	Schema L.1
Rev	A	3	1.1000.A3	Schema L.1
Rev	A	4	1.1000.A3	Schema L.1
Rev	A	5	1.1000.A3	Schema L.1
Rev	A	6	1.1000.A3	Schema L.1
Rev	A	7	1.1000.A3	Schema L.1
Rev	A	8	1.1000.A3	Schema L.1
Rev	A	9	1.1000.A3	Schema L.1
Rev	A	10	1.1000.A3	Schema L.1
Rev	A	11	1.1000.A3	Schema L.1
Rev	A	12	1.1000.A3	Schema L.1
Rev	A	13	1.1000.A3	Schema L.1
Rev	A	14	1.1000.A3	Schema L.1
Rev	A	15	1.1000.A3	Schema L.1
Rev	A	16	1.1000.A3	Schema L.1
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Rev	A	21	1.1000.A3	Schema L.1
Rev	A	22	1.1000.A3	Schema L.1
Rev	A	23	1.1000.A3	Schema L.1
Rev	A	24	1.1000.A3	Schema L.1
Rev	A	25	1.1000.A3	Schema L.1
Rev	A	26	1.1000.A3	Schema L.1
Rev	A	27	1.1000.A3	Schema L.1
Rev	A	28	1.1000.A3	Schema L.1
Rev	A	29	1.1000.A3	Schema L.1
Rev	A	30	1.1000.A3	Schema L.1
Rev	A	31	1.1000.A3	Schema L.1
Rev	A	32	1.1000.A3	Schema L.1
Rev	A	33	1.1000.A3	Schema L.1
Rev	A	34	1.1000.A3	Schema L.1
Rev	A	35	1.1000.A3	Schema L.1
Rev	A	36	1.1000.A3	Schema L.1
Rev	A	37	1.1000.A3	Schema L.1
Rev	A	38	1.1000.A3	Schema L.1
Rev	A	39	1.1000.A3	Schema L.1
Rev	A	40	1.1000.A3	Schema L.1
Rev	A	41	1.1000.A3	Schema L.1
Rev	A	42	1.1000.A3	Schema L.1
Rev	A	43	1.1000.A3	Schema L.1
Rev	A	44	1.1000.A3	Schema L.1
Rev	A	45	1.1000.A3	Schema L.1
Rev	A	46	1.1000.A3	Schema L.1
Rev	A	47	1.1000.A3	Schema L.1
Rev	A	48	1.1000.A3	Schema L.1
Rev	A	49	1.1000.A3	Schema L.1
Rev	A	50	1.1000.A3	Schema L.1

Originator: Natural Building Design  
 28 Gardena Close  
 Rendlesham Suffolk IP12 2GX

Project No: CC DEVELOPMENTS  
 AREA 8 RENDLESHAM

Layout Title: SITE PLAN  
 DISTANCES BETWEEN UNITS

Drawing Number: 84 SL / Pd  
 Rev: E

This drawing is the property of  
 CC Developments  
 Natural Building Design  
 and it can be used  
 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

Rev	By	Date	Scale
PW	C	8 Apr 19	1:250 AS FIN
PW	B	4 Apr 19	1:250 AS FIN
PW	A	31 Mar 19	1:250 AS FIN
PW	A	27 Mar 19	1:250 AS FIN
Rev	By	Date	Scale

Originator: Natural Building Design  
 29 Gardemia Close  
 Rendlesham Suffolk IP12 2GX

Project: CC DEVELOPMENTS  
 AREA 8 - RENDLESHAM

LAYOUT TITLE: SITE PLAN DETAIL  
 TYPICAL PRIVATE DRIVE  
 ACCESS & PARKING

Drawing Number: 84 - SP / PW  
 Rev: C



**Key**



Site



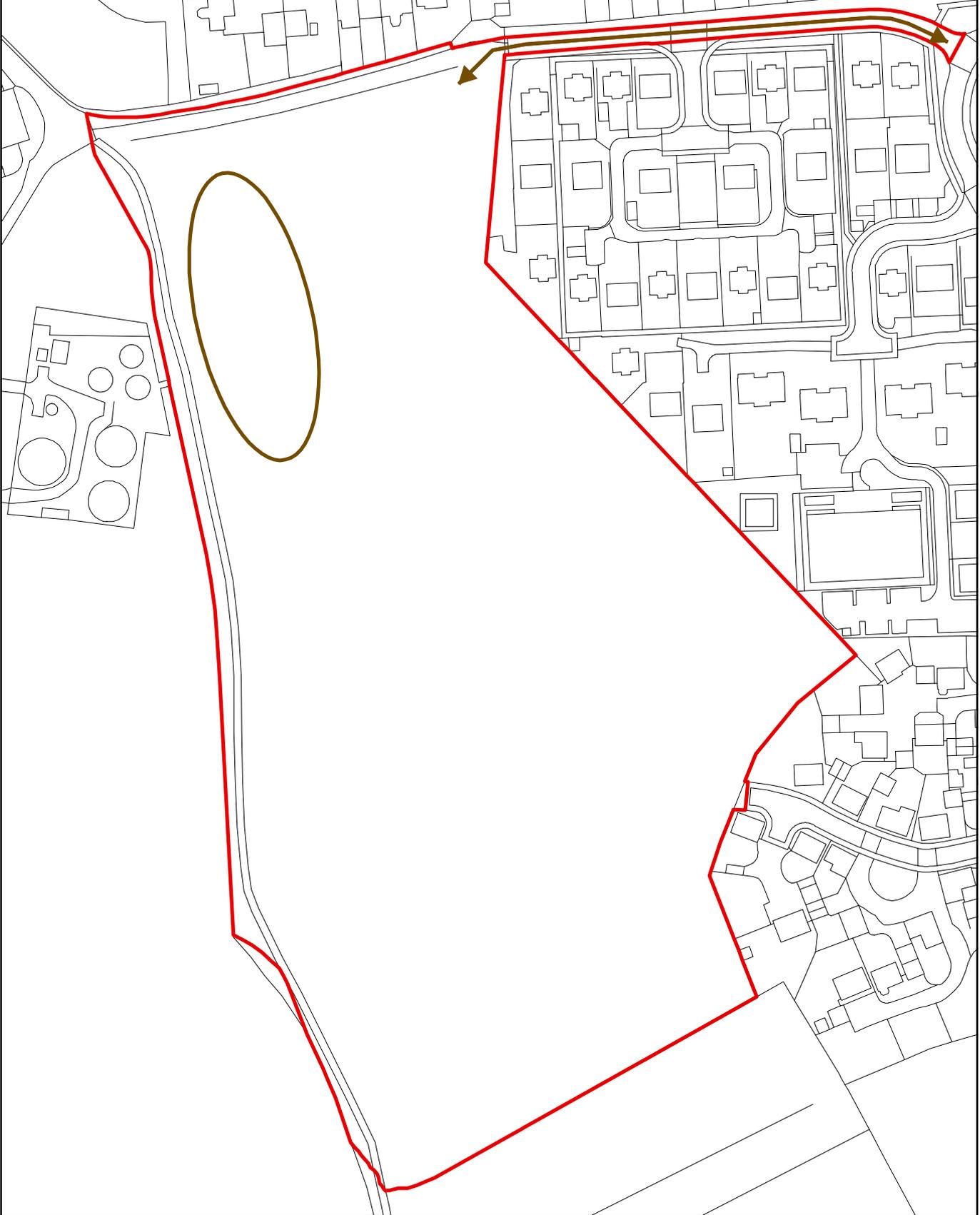
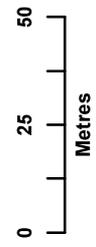
Construction Management Staging Area



Suggested Construction Vehicle Access Point

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Project: PS-2018-0645 Rendlesham

Construction Management Plan

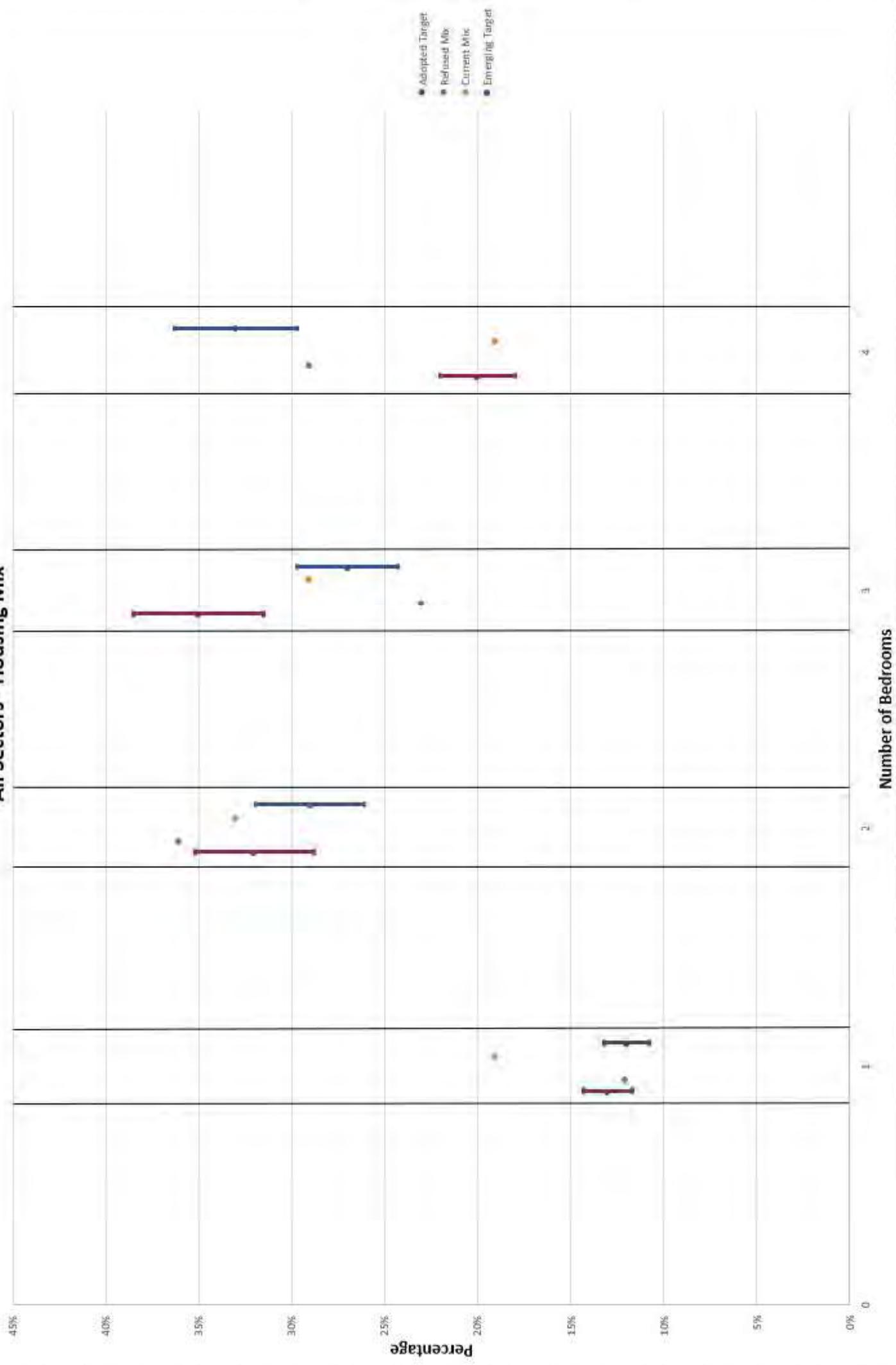
Drawing no: 2018/0645 | CMP1

Rev. 0 Date: March 2019

Scale: NTRS at A4 Drawn: TP



# All Sectors - Housing Mix





# CAPITAL COMMUNITY DEVELOPMENTS LTD

