



Report For Delegated Planning Application

Location

Land North Of Gardenia Close
And
Garden Square
Rendlesham
Suffolk

Proposal:

A phased development of 75 dwellings, car parking, public open space, hard and soft landscaping and associated infrastructure and access.

Application ref:

DC/19/1499/FUL

Application type:

Full Application

Applicant:

Mr Anthony Hardy

Expiry date:

8 July 2019

Parish:

Rendlesham

Ward:

Rendlesham

Planning policy

SP1 Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP1A Presumption in Favour of Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP2 Housing Numbers and Distribution (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP3 New Homes (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP11 Accessibility (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP12 Climate Change (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP14 Biodiversity and Geodiversity (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP15 Landscape and Townscape (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP16 Sport and Play (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

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SP17 Green Space (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP18 Infrastructure (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP19 Settlement Policy (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

SP27 Key and Local Service Centres (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM2 Affordable Housing on Residential Sites (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM3 Housing in the Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM19 Parking Standards (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM20 Travel Plans (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM21 Design: Aesthetics (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM22 Design: Function (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM23 Residential Amenity (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM25 Art (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM26 Lighting (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM27 Biodiversity and Geodiversity (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM28 Flood Risk (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM32 Sport and Play (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

DM33 Allotments (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)

Newspaper advertisements

East Anglian Daily Times, for Major Application, Archaeological Site, Departure, published on 25 April 2019

Site notices

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The following site notices have been displayed:

General Site Notice

Reason for site notice: Major Application, May Affect
Archaeological Site, Departure from Local Plan,
Date posted: 17 April 2019
Expiry date: 13 May 2019

Consultations

Consultee (summarized comments)	Date consulted	Date replied
Parish Council		13 May 2019
Comments:		
Parish Council		16 May 2019
Comments:		
Parish Council		17 May 2019
Comments:		
Parish Council		22 May 2019
Comments:		
Parish Council		6 June 2019
Comments:		
East Suffolk Ecology (Internal)	15 April 2019	No reply received.
Housing Development Team	15 April 2019	No reply received.
Parish Council	15 April 2019	9 May 2019
Comments:		
Anglian Water	15 April 2019	8 May 2019
Comments:		
Suffolk County - Highways Department	15 April 2019	7 May 2019
Comments:		

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SCDC Environmental Protection	15 April 2019	7 May 2019
Comments:		
Suffolk Fire And Rescue Service	15 April 2019	2 May 2019
Comments:		
Suffolk Wildlife Trust	15 April 2019	3 May 2019
Comments:		
Economic Services (SCDC)	15 April 2019	7 May 2019
Comments:		
Housing Development Team	15 April 2019	No reply received.
Disability Forum	15 April 2019	No reply received.
Environment Agency - Drainage	15 April 2019	No reply received.
Andy Osman Emergency Planning	15 April 2019	No reply received.
Mr Steve Newman	15 April 2019	16 April 2019
Comments:		
Network Rail	15 April 2019	No reply received.
Police - Alan Keely Crime Reduction Beccles Police Station	15 April 2019	No reply received.
Suffolk County Council Section 106 Officer	15 April 2019	17 April 2019
Comments:		
Suffolk County Archaeological Unit	15 April 2019	23 April 2019
Comments:		
SCC Flooding Authority	15 April 2019	29 April 2019
Comments:		
Suffolk County - Rights Of Way	15 April 2019	No reply received.
Development & Policy (SCDC)	15 April 2019	9 May 2019
Comments:		

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Suffolk Police Designing Out Crime Officer	15 April 2019	29 May 2019
Comments:		
SUSTRANS	15 April 2019	No reply received.
Mr Nick Newton	15 April 2019	No reply received.
Design And Conservation (Internal)	15 April 2019	No reply received.
NHS England Midlands And East	15 April 2019	No reply received.
Waste Management Services	15 April 2019	No reply received.
Parish Council		14 May 2019
Comments:		
East Suffolk Ecology (Internal)		6 June 2019
Comments:		

Neighbour comments

Number of properties originally consulted: 111

Number of contributors: 69

No. of Objections: 19

Letters of Support: 48

Other representations: 1

1 Gardenia Close, Rendlesham

Contributor type: In support

Reason(s) for comments: In support,

11 Gardenia Close, Rendlesham

Contributor type: Objector

Reason(s) for comments: ,

Tidy Road, Rendlesham

Contributor type: Other comment

Reason(s) for comments: ,

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Elm Leigh , School Road

Contributor type: In support

Reason(s) for comments: ,

,

Contributor type: In support

Reason(s) for comments: ,

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Contributor type: In support

Reason(s) for comments: ,

24B Trent House , Upper House

Contributor type: In support

Reason(s) for comments: ,

Field End , 19 Tidy Road

Contributor type: Objector

Reason(s) for comments: ,

5 Garden Square, Rendlesham

Contributor type: In support

Reason(s) for comments: ,

9 Gardenia Close, Rendlesham

Contributor type: In support

Reason(s) for comments: In support,

2 Chestnut Close, Rendlesham

Contributor type: Objector

Reason(s) for comments: Over Development,

7 Tidy Road, Rendlesham

Contributor type: Objector

Reason(s) for comments: ,

19 Forest Gardens , Rendlesham

Contributor type: Objector

Reason(s) for comments: ,

3 Garden Square, Rendlesham

Contributor type: In support

Reason(s) for comments: ,

,

Contributor type: Objector

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Reason(s) for comments: ,

,

Contributor type: In support

Reason(s) for comments: ,

59 Mayhew Road, Rendlesham

Contributor type: Objector

Reason(s) for comments: ,

7 Gardenia Close, Rendlesham

Contributor type: In support

Reason(s) for comments: ,

75 Mayhew Road, Rendlesham

Contributor type: Objector

Reason(s) for comments: Access, Building work, Design, Health and Safety, Noise, Over Development,

27 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

4 A Garden Square, Suffolk

Contributor type:

Reason(s) for comments: ,

1 Garden Square, Rendlesham

Contributor type:

Reason(s) for comments: ,

7 Garden Square, Rendlesham

Contributor type: In support

Reason(s) for comments: ,

Magnolia Drive, Rendlesham

Contributor type:

Reason(s) for comments: ,

15 Ashton Close, Rendlesham

Contributor type: Objector

Reason(s) for comments: ,

79 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

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,
Contributor type:
Reason(s) for comments: ,

Brookwood, 49 Mayhew Road
Contributor type:
Reason(s) for comments: ,

12 Garden Square, Rendlesham
Contributor type:
Reason(s) for comments: ,

Office, Garden House
Contributor type:
Reason(s) for comments: ,

2 Garden House, Rendlesham Hall Farm Lane
Contributor type:
Reason(s) for comments: ,

1 Garden House, Rendlesham Hall Farm Lane
Contributor type:
Reason(s) for comments: ,

56 Mayhew Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

57 Mayhew Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

21 Tidy Road, Rendlesham
Contributor type: Objector
Reason(s) for comments: ,

3 Peace Palace Gardens, Gardenia Close
Contributor type:
Reason(s) for comments: ,

24 Gardenia Close, Rendlesham
Contributor type:
Reason(s) for comments: ,

22 Jays Croft Road, Rendlesham

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Contributor type:
Reason(s) for comments: ,

18 Jays Croft Road, Rendlesham

Contributor type: Objector
Reason(s) for comments: ,

69 Mayhew Road, Rendlesham

Contributor type:
Reason(s) for comments: ,

63 Mayhew Road, Rendlesham

Contributor type:
Reason(s) for comments: ,

3 Tidy Road, Rendlesham

Contributor type: Objector
Reason(s) for comments: ,

Sewage Treatment Works, Rendlesham Hall Farm Lane

Contributor type:
Reason(s) for comments: ,

24 Garden Square, Rendlesham

Contributor type: In support
Reason(s) for comments: In support,

27 Gardenia Close, Rendlesham

Contributor type: In support
Reason(s) for comments: ,

17 Gardenia Close, Rendlesham

Contributor type: In support
Reason(s) for comments: ,

27 Redwald Road, Rendlesham

Contributor type:
Reason(s) for comments: ,

26 Jays Croft Road, Rendlesham

Contributor type:
Reason(s) for comments: ,

Maharishi Peace Palace, Gardenia Close

Contributor type: In support
Reason(s) for comments: ,

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2 Tidy Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

1 Tidy Road, Rendlesham

Contributor type: Objector

Reason(s) for comments: ,

23 Gardenia Close, Rendlesham

Contributor type: In support

Reason(s) for comments: In support,

22 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

17 Garden Square, Rendlesham

Contributor type: In support

Reason(s) for comments: ,

9 Garden Square, Rendlesham

Contributor type:

Reason(s) for comments: ,

11 Sparrows Croft Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

27 Jays Croft Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

19 Redwald Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

73 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

61 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

31 Gardenia Close, Rendlesham

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DX: 41220 Lowestoft

Contributor type:
Reason(s) for comments: ,

29 Gardenia Close, Rendlesham

Contributor type: In support
Reason(s) for comments: ,

21 Gardenia Close, Rendlesham

Contributor type:
Reason(s) for comments: ,

,
Contributor type: In support
Reason(s) for comments: ,

,
Contributor type: In support
Reason(s) for comments: ,

7 Garden Square, Rendlesham

Contributor type: In support
Reason(s) for comments: ,

,
Contributor type: In support
Reason(s) for comments: ,

Beech Hall, 12 Gardenia Close

Contributor type: In support
Reason(s) for comments: ,

Greenwood House, 15 Saxonfields

Contributor type: In support
Reason(s) for comments: ,

,
Contributor type: In support
Reason(s) for comments: ,

35 Magnolia Drive, Rendlesham

Contributor type: In support
Reason(s) for comments: ,

Ivy House , Worlingworth

Contributor type: In support
Reason(s) for comments: ,

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Hillcrest, , Snape Watering

Contributor type: In support

Reason(s) for comments: ,

20 Gardenia Close, Rendlesham

Contributor type: In support

Reason(s) for comments: ,

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Contributor type: In support

Reason(s) for comments: ,

,

Contributor type: In support

Reason(s) for comments: ,

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Contributor type: In support

Reason(s) for comments: ,

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Contributor type: In support

Reason(s) for comments: ,

Ivy House, Worlingworth

Contributor type: In support

Reason(s) for comments: ,

,

Contributor type: In support

Reason(s) for comments: ,

,

Contributor type: In support

Reason(s) for comments: ,

3 Garden Square, Rendlesham

Contributor type: In support

Reason(s) for comments: ,

8 Garden Square, Rendlesham

Contributor type: In support

Reason(s) for comments: ,

4 Peace Palace Gardens, Gardenia Close

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DX: 41220 Lowestoft

Contributor type:
Reason(s) for comments: ,

71 Mayhew Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

65 Mayhew Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

6 Tidy Road, Rendlesham
Contributor type: Objector
Reason(s) for comments: ,

8 Tidy Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

5 Tidy Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

53 Mayhew Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

28 Gardenia Close, Rendlesham
Contributor type:
Reason(s) for comments: ,

20 Garden Square, Rendlesham
Contributor type: In support
Reason(s) for comments: ,

5 Peace Palace Gardens, Gardenia Close
Contributor type:
Reason(s) for comments: ,

26 Gardenia Close, Rendlesham
Contributor type: In support
Reason(s) for comments: ,

25 Gardenia Close, Rendlesham
Contributor type:
Reason(s) for comments: ,

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15 Sparrows Croft Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

35 Redwald Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

29 Redwald Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

18 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

58 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

54 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

6 Peace Palace Gardens, Gardenia Close

Contributor type:

Reason(s) for comments: ,

9 Sparrows Croft Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

31 Redwald Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

33 Redwald Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

20 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

19 Gardenia Close, Rendlesham

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Contributor type:
Reason(s) for comments: ,

25 Redwald Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

17 Sparrows Croft Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

24 Jays Croft Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

21 Jays Croft Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

16 Jays Croft Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

14 Jays Croft Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

28 Jays Croft Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

23 Jays Croft Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

20 Jays Croft Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

17 Redwald Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

23 Redwald Road, Rendlesham
Contributor type:
Reason(s) for comments: ,

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21 Redwald Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

25 Jays Croft Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

17 Tidy Road, Rendlesham

Contributor type: Objector

Reason(s) for comments: ,

7 Tidy Road, Rendlesham

Contributor type: Objector

Reason(s) for comments: ,

14 Garden Square, Rendlesham

Contributor type:

Reason(s) for comments: ,

The Princess, 59 Mayhew Road

Contributor type:

Reason(s) for comments: ,

10 Garden Square, Rendlesham

Contributor type:

Reason(s) for comments: ,

15 Garden Square, Rendlesham

Contributor type:

Reason(s) for comments: ,

18 Garden Square, Rendlesham

Contributor type: In support

Reason(s) for comments: ,

1 Garden Square, Rendlesham

Contributor type: In support

Reason(s) for comments: Access, Design, Landscape impact, Principle of Use, Sustainability, Trees,

5 Garden Square, Rendlesham

Contributor type:

Reason(s) for comments: ,

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Workshop, Rendlesham Hall Farm

Contributor type:

Reason(s) for comments: ,

Wendels, 4 Tidy Road

Contributor type:

Reason(s) for comments: ,

15 Tidy Road, Rendlesham

Contributor type: Objector

Reason(s) for comments: ,

55 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

16 Garden Square, Rendlesham

Contributor type:

Reason(s) for comments: ,

25 Garden Square, Rendlesham

Contributor type: In support

Reason(s) for comments: ,

19 Garden Square, Rendlesham

Contributor type: In support

Reason(s) for comments: ,

22 Garden Square, Rendlesham

Contributor type:

Reason(s) for comments: ,

23 Garden Square, Rendlesham

Contributor type: In support

Reason(s) for comments: ,

67 Mayhew Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

Field End, 19 Tidy Road

Contributor type:

Reason(s) for comments: ,

Oak View, 11 Tidy Road

Contributor type: Objector

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DX: 41220 Lowestoft

Reason(s) for comments: ,

9 Tidy Road, Rendlesham

Contributor type: Objector

Reason(s) for comments: ,

30 Gardenia Close, Rendlesham

Contributor type:

Reason(s) for comments: ,

11 Garden Square, Rendlesham

Contributor type:

Reason(s) for comments: ,

2 Garden Square, Rendlesham

Contributor type: In support

Reason(s) for comments: In support,

6 Garden Square, Rendlesham

Contributor type:

Reason(s) for comments: ,

21 Garden Square, Rendlesham

Contributor type:

Reason(s) for comments: ,

19 Tidy Road, Rendlesham

Contributor type:

Reason(s) for comments: ,

,
Contributor type: In support

Reason(s) for comments: ,

5 Peace Palace Gardens , Off Gardenia Place

Contributor type: In support

Reason(s) for comments: ,

Full details of consultee and neighbour comments are available in 'Associated Documents' in the Public Access pages at www.eastsuffolk.gov.uk/public-access)

Case Officer assessment

Recommendation: Application Refused

Conditions/Reason for refusal:

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1. The proposal site is identified within Policy SSP12 (Land west of Garden Square, Rendlesham) of the East Suffolk - Suffolk Coastal District Local Plan - Site Allocations and Area Specific Policies, as being suitable for approximately 50 dwellings provided it conforms with the other elements of the policy and the wider Development Plan.

The proposal is not considered to conform to elements of Policy SSP12, Policies DM21, DM23 of the East Suffolk - Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document (adopted July 2013) and the NPPF, in regards of the layout and form of the site, and the impact on the amenity of the neighbouring properties. Therefore there is principle objection to the application as the level of dwellings that are being required cannot currently be accommodated on the site in the form proposed.

2. Policy SP3 (New Homes) requires a mix of dwelling sizes and tenure. Policy DM2 (Affordable Housing on Residential Sites) requires the proportion of affordable properties that need to be provided within residential developments as 33%.

The proposal does indicate that 33% of the proposed scheme would be affordable dwellings. However, there is no information within the application as to which units are proposed as affordable units, and therefore it has not been demonstrated that the scheme would provide an appropriate mix of size, tenure and distribution across the site. As such, there is no information and justification provided that this scheme will provide an appropriate level and tenure of affordable dwellings and that the very bespoke design approach is likely to be attractive as housing to Registered Providers if secured by s106. Therefore these scheme fails to conform to Policy DM2 of the East Suffolk - Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document (adopted July 2013) and the NPPF which require an appropriate level of affordable dwellings to be provided within a housing development.

Therefore the proposal does not meet the requirements of Policy SP3 and DM2 of the East Suffolk - Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document (adopted July 2013) and the NPPF.

3. The development is not in accordance with paragraph 127 and 129 of the NPPF, Policy DM21 of the East Suffolk - Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document (adopted July 2013) and national design guidance in the form of Building for Life 12 (2015) which require a development to create a socially inclusive development through a well designed and safe built environment. Policy DM21 and Policy DM22 of the Core Strategy also require that any development creates a safe space that is well related to the scale and character of their surroundings, gives attention to the form, scale and landscape of the spaces between buildings and the boundary treatment of individual sites and reduce the amount of car use within a site. The development includes a number of elements of poor design, in that it fails to create well laid out streets and its layout would create features, barriers and exposed spaces and boundaries which would not form a safe and socially interactive development.

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4. To the north east of the site is an Anglian Water Treatment Works, therefore there is a Cordon Sanitaire covering part of the north east of the site. The application provides insufficient assessment information regarding the potential impacts of odour from the sewage plant and the effect that may have on the proposed layout and open spaces. The submitted information does not correspond with the latest layout proposal. It is therefore not possible to determine that there will be no effects on residents which would adversely affect their amenity and the effectiveness of the current extent of cordon sanitaire around the sewage treatment plant. On that basis, in the absence of adequate assessment of effects the proposal may result in adverse impacts on residential amenity contrary to policies DM21 and DM23 of the East Suffolk Council - Suffolk Coastal District - Core Strategy and Policy SSP12 of the East Suffolk Council - Suffolk Coastal District - Site Allocations and Area Specific Policies, and the NPPF.

5. Due to the proposed layout of the development, there would be a number of significant adverse impacts upon residential amenity,

The limited depths of private amenity spaces, and associated boundary treatments would result in insufficient useable amenity areas, and limited outlooks from habitable rooms within the proposed dwellings.

The locations of windows on the proposed dwellings, in association with the proposed layout, would result in direct views, and thus loss of privacy between the proposed dwellings and their gardens. The layout and window arrangement, would also result in overlooking of existing adjacent dwellings and their private amenity areas.

Plot 15 is also proposed to be entirely visible from public vantage points, and therefore would not benefit from any private amenity space.

The scheme would therefore result in unacceptable adverse impacts upon residential amenity of both existing and future residents, contrary to the NPPF, East Suffolk - Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document (adopted July 2013) Policy DM23.

6. This application is for more than 50 dwellings and is inside of the 13km Impact Risk Zone of Designated Sites. The current submitted Habitats Regulations Assessment of on site and off site mitigation measures is not adequate for the level of development that is being proposed.

The level of development proposed, without adequate on site space to address recreational pressures on European Sites, the proposal would lead to likely significant effects on European Sites and therefore does not pass an Appropriate Assessment. Therefore, the Local Planning Authority cannot conclude 'no likely significant effects' from the development proposal on the designated site(s).

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The proposal is therefore contrary to the NPPF, and Policies SP14 and DM27(i) (Biodiversity and Geodiversity) of the East Suffolk District - Suffolk Coastal District Local Plan Core Strategy & Development Management Policies Development Plan Document (2013), which seek to protect designated sites in accordance with The Conservation of Habitats and Species Regulations (2017).

7. Policy SSP12 (Land west of Garden Square, Rendlesham) of the East Suffolk - Suffolk Coastal District Local Plan - Site Allocations and Area Specific Policies requires the development to accommodate existing sewers on the site. No evidence has been provided to demonstrate how or where the sewers will be relocated in order to achieve the proposed layout, particularly the 9 plots which sit on top of the east-west sewer. In the absence of this detail the deliverability of the proposed development is not clear and the proposal fails to meet the requirement of Policy SSP12.
8. The proposal fails to make adequate provision/contributions (and/or agreement to provide) for facilities/services for the occupants of the dwellings. The applicant has not entered into the necessary legal agreement, which is required to ensure the following necessary mitigation and policy requirement are secured:
 - o The provision of a third of the dwellings as affordable housing (Policy SP3 of the Core Strategy)
 - o The provision and management of open space
 - o On site provision of appropriate recreation space and financial contribution towards the Recreational Avoidance Mitigation Strategy.
 - o Delivery and management of open space and communal areas

Informatives:

1. In the determination of this application the Local Planning Authority has considered the following documents submitted within the application:

Received 9th April 2019

House Drawings
EAST/E/1 Rev 05,
EAST/P/1 Rev 04,
WB/E/1 Rev 04,
WB/P/1 Rev 04,
F/E/1 Rev 4,
F/P/1 Rev4,
G/E/1 Rev 03,
G/P/1 Rev 03,
Bram/E/1,
Bram/FP/1,
Bram/RP/1,
Deb/FP/1 Rev A,
Deb/FP/1 Rev A,

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Deb/FP/1 Rev A,
WILB/Elev/1 rev 04,
WILB/FP/1 rev 04,
SUB/E/1 Rev 05,
SUB/FP/1 Rev 05,
SUB/RP/1 Rev 05,
HT/E/1,
B/E/1a Rev 05,
B/FP/1a Rev 05,
B/E/1b Rev 05,
B/FP/1b Rev 05,
M/EXT/1 Rev 02
M/EXT/2 Rev 02
SG/PE/1 Rev A,
DG/P,E/1 Rev A

Drainage Drawings
Targeted Drainage Survey

Topographical Survey
20323se-01
20323se-02
20323se-03
20323se-04

Site Layout
84/SP/Pv REVJ
E18836-001
E18836-002
2018/0645 - SLP1
2018/0645/SCP1

Documents
Design and Access Statement
Archaeological Evaluation Report (SACIC Report No. 2018_084)
Geophysical Survey Report (SACIC Report No. 2017/097)
Preliminary Ecological Appraisal March 2018
Habitats Regulations Assessment (March 2019)
Air Quality Assessment (February 2018)
LSDP 1159-01
Transport Statement 16/R/04
Odour Assessment 4.0
Flood Risk Assessment AMA647 Rev 0
Addendum to Flood Risk Assessment (Ref: AMA647, May 2018)
Phase 1 (Desk Study) Ground Contamination Report 3244
Economic Viability Analysis

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2. The local planning authority has identified matters of concern with the proposal and the report clearly sets out why the development fails to comply with the adopted development plan. The report also explains why the proposal is contrary to the objectives of the National Planning Policy Framework and local plan to deliver sustainable development.

Case Officer report

Site and Proposals

This application seeks Full Planning Permission for a three phased development of 75 dwellings, car parking, public open space, hard and soft landscaping and associated infrastructure and access.

The first proposed access to the site is from both Tidy Road (southern edge), which crosses an area of land that is not owned by the applicant, (notice has been served on these owners). The second access is proposed onto Sycamore Drive (south east corner) which is via Garden Square, which is not an adopted road. There is proposed to be one main road through the site (east to west) and a circular road then leading to Tidy Road. There are 10 cul-de-sac off of the main roads through the site that lead to the 37 plots of proposed dwellings, 38 plots are indicated on the proposed plans, but there is no plot 13.

There are two pedestrian accesses to the site, one of which is to the north of the current Maharishi Peace Palace and the other is adjacent to the Tidy Road access. There is not one leading from the second road access, Sycamore Drive. The current path past the Maharishi Peace Palace is not a Public Right of Way, this is a private foot path.

The 75 dwellings contain a mixture of bungalows, semi detached, detached, flatted and maisonette properties. With the exception of the bungalows, they are all proposed to be two storey in height with rooms in the roof. To the front (east) of all of the properties is an area of parking. There is a mixture of sized gardens and amenity spaces to the rear (west) of the properties.

In the north east corner of the site is proposed an area of public open space which is within the cordon sanitaire associated with an Anglian Water waste water treatment plant, adjacent to to the north east corner of the site. Also proposed within this open space area is a play area and pumping station.

The west of the site is proposed to contain an area that has been indicated as a feature space, which is to be subject to detailed design, at a later date. This is the same as an area to the south of the site, adjacent to plot 15.

The current use of the site is an agricultural field, the northern and western boundaries are mature vegetation and hedge rows, beyond this is woodland. To the east of the site are the rear gardens of 18, 20, 22, 24, 26, 27 and 28 Jays Croft Road. Along the southern boundary edge is 23, 24 and 25 Garden Square, 29, 30 and 31 Gardenia Close, 5 Peace Palace, Maharishi Peace Palace, 67 and 69 Mayhew Road, 8, 19 and 21 Tidy Road.

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The proposal site is 5.19 hectares and located within the Rendlesham Physical Limits Boundary, Rendlesham Neighbourhood Plan (January 2015) and Policy SSP12 (Land West Of Garden Square) of the East Suffolk - Suffolk Coastal District - Site Allocations and Area Specific Policies January 2017.

Relevant Planning History

A Pre-application was submitted for 75 dwellings and associated works (DC/PREAPP/17/5049), the application was considered to be looked upon favourably if changes to the layout were carried out, there is to be no impact on the amenity of the neighbouring properties, the housing mix and affordable housing is to conform to the Core Strategy and other matters were raised to the applicants attention. The level of this development may be acceptable if the other material planning considerations are also acceptable.

Application DC/18/2374/FUL for 75 dwellings was refused on the 6th September 2018 for the following:

1. The proposal site is also identified within Policy SSP12 (Land west of Garden Square, Rendlesham) of the Site Allocations and Area Specific Policies this identifies that approximately 50 dwellings will be provided within the site as long as it conforms with the other elements of the policy. It has been demonstrated through appeal APP/J3530/W/16/3160194 and Housing Land Supply Assessment, 1 April 2018 to 31 March 2023 (June 2018) that the Local Planning Authority has a 5 year housing land supply. This proposal is for 75 dwellings which is an extra 50% as requested by the policy. This is going to be an over development of the site which is not required to meet the housing need within the District.
2. The proposal does not meet the social objective requirement as stated by paragraph 8 of the NPPF, part I) of Policy SP1 of the Core Strategy and the Rendlesham Neighbourhood Plan. There is a concern that the houses are not completely for the open market, as they are to be provided for a very particular specification, for which a waiting list already exists. If this development is only to be for one community and not for wider market housing as it is to be only built to meet one specific need then it would not create an inclusive and sustainable community, nor would it allow for easy integration of this development into the surrounding Rendlesham Communities
3. Policy SP3 (New Homes) requires a mix of different bedroom properties, this proposal is to create too many 4+ bedroom properties that are required for a development of this size and located on the edge of Rendlesham. There is also no mix of the size of housing, there are two and three storey dwellings, maisonettes and flats, but there are no bungalows throughout the site. Therefore the proposal is not in conformity with Policy SP3 and DM21 of the Core Strategy.
4. Policy DM2 (Affordable Housing on Residential Sites) of the Core Strategy requires that there are 33% of affordable housing required on the site, this would be with a 70% affordable rented / 30% shared ownership/equity split, this is a green field site and should be able to support the standard required by the policy. The applicant has stated that there are to be 24% of dwellings on the site that are all to be shared equity and they would not be made available for specific local affordable housing needs. This therefore does not conform to Policy DM2.

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5. The development is not in accordance with the NPPF and the Core Strategy. In specific paragraphs 8 b) and 91 of the NPPF, which both require a development to create a socially inclusive development through a well designed and safe built environment. Policy DM21 of the Core Strategy also requires that any development is to create a safe space that is well related to the scale and character of their surroundings, attention must also be given to the form, scale and landscape of the spaces between buildings and the boundary treatment of individual sites. The development is a poorly design development that would not create a safe and socially interactive development.

6. This proposal is not acceptable as it would cause overlooking, overshadowing and a dominating effect on the future residents and current residents of the surrounding site. The proposal does not conform with Policy DM23 of the Core Strategy on this matter and The NPPF specifically paragraph 8 and 127.

7. This application is for more than 50 dwellings and is inside of the 13km Impact Risk Zone of Designated Sites. The current HRA report concludes 'no significant effect', however insufficient information has been provided to demonstrate that this would be the case without mitigation being secured. On site mitigation in the form of an adequate quantity and quality of recreational and dog walking routes would need to be demonstrated and a contribution to the Recreational Avoidance Mitigation Strategy is necessary and would need to be secured as a planning obligation. If the development was to proceed then an Appropriate Assessment would be required to consider the effectiveness of the mitigation to avoid likely significant effects on designated sites.

8. The proposal fails to make adequate provision/contributions (and/or agreement to provide) for facilities/services for the occupants of the dwellings. The applicant has not entered into the necessary legal agreement, which is required to ensure the following is provided:

- o The provision of a third of the dwellings as affordable housing
- o The provision of a travel plan (?)
- o The provision and management of open space
- o Financial contribution towards the Recreational Avoidance Mitigation Strategy.

An additional pre-application (DC/PREAPP/18/4778) was submitted for the same proposal, meetings were held with the applicant and the agent to discuss the previous refusal reasons. It was concluded that the refusal reasons could be overcome with design changes to the application, but they will still stand if substantial changes are not made.

Consultations

Rendlesham Parish Council: Object to the application for the following matters:

- o Type, mix, density and Design of dwellings through the site
- o Transport Statement, made in the proposals restricted to a particular type of lifestyle, therefore were unrealistic as they did not reflect the activity of the general community.
- o The application does not make tangible commitment to providing infrastructure for the village.

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- o allotments, orchard and growing spaces
- o Adoption of all roads, including service roads
- o Assurance from East Suffolk Council that the commercial viability of the development is sound.
- o To recognise the need for local housing for local people as per the Rendlesham Housing Needs Survey in that that the affordable housing element of the development is delivered, managed and marketed by a registered Affordable Housing provider, embracing the parameters of the following affordable housing eligibility criteria normally reserved for exception sites:
 - o To close the Tidy Road entrance with a barrier and used only as an emergency exit during the construction period
 - o Flooding
 - o CIL and if it is going to meet the capacity of the Town

The following points are considered to confirm to the Rendlesham Neighbourhood Plan.

- o The proposals incorporate open green spaces.
- o The street scene meets the RNP criteria in providing the ideal street scene.
- o Road layout

Tunstall Parish Council (Neighbouring Parish Council): There is a concern in regards of the additional traffic this will create in the area; especially through villages like Tunstall and Campsea Ashe where drivers try to avoid the bottleneck of the Melton Crossroads. We are also concerned that all additional doctors, dentist and schools positions should be in place BEFORE the development begins.

Ufford Parish Council (Neighbouring Parish Council): Object to this application on the grounds of the unacceptable impact this would have on the Highway.

Eyke Parish Council (Neighbouring Parish Council): The building of 75 dwellings will have an impact on traffic through the village of Eyke, in terms of daily vehicle movements.

Melton Parish Council (Neighbouring Parish Council): The amount of dwellings within the proposal will impact on the at Melton crossroads and the Air Quality Management Area. Given the 50% higher number of dwellings proposed in this application there must be concerns regarding the impact on air quality in Melton and Woodbridge. Paragraph 109 of the NNPF states that "residual cumulative impacts on the road network would be severe" should be taken into consideration, therefore this development should be refused on highways grounds.

Campsea Ashe Parish Council (Neighbouring Parish Council): Please accept this response to the above application from Campsea Ashe Parish Council which in part supports previous comments received from local people re development in Rendlesham, particularly residents of Ivy Lodge Road, Campsea Ashe.

The most important consultee comments on this development will be those from Rendlesham Parish Council, as informed by their Neighbourhood Plan and therefore Campsea Ashe Parish Council have a neutral view.

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There is a concern on the likely impact of this proposal on the highways and transport network in Campsea Ashe will be adverse.

East Suffolk Head of Housing: The amount of affordable housing to be provided is acceptable, however, there needs to be more detail on the type and tenure.

Anglian Water: This development is in close proximity to Rendlesham-Park water recycling centre (WRC) and would draw attention to the potential for nuisance, associated with the operation of this treatment works, to effect the proposed development. Anglian Water initial odour risk assessment indicates that there is potential for loss of amenity at sensitive property within the proposed development due to odour emissions from the operation of the WRC. This WRC is operated in compliance with the appropriate regulatory standards and in accordance with established best practice. It is advised that the proposed layout seeks to maintain an effective distance between the treatment works and sensitive accommodation. It is recommended that a detailed odour risk assessment is undertaken to establish the range at which the amenity of neighbouring property is likely to be impaired. The results of any detailed assessment can be reviewed in further consultation.

Suffolk County Council Highways Authority: No objection to the application, subject to conditions

Suffolk County Council Fire and Rescue: Fire Hydrants are required for this development, other Informatives and conditions are to be applied to the application.

East Suffolk Council Head of Environmental Health: Condition has been requested in regards of Contamination, to indicate to the Local Planning Authority if any is found on the site. The proximity of the sewage treatment plant may have noise implications for nearby dwellings and the impact of the works will need to be assessed using the appropriate standard, therefore a condition is to be applied to the application on this matter. Also a construction management plan condition is also to be applied to the application

Suffolk Wildlife Trust: "The submitted ecological survey report (Basecology, March 2018) and the Habitats Regulations Assessment (The Landscape Partnership, March 2019) are acceptable. If the application is granted then a further walkover survey for badgers should be undertaken prior to works commencing. A condition is to be applied to the application to ensure that all recommendations are implemented in full.

East Suffolk Council Head of Economic Development: No comments to make

Suffolk Police Design Out Crime Officer: Objections to the application.

Suffolk County Council S106 Officer: Monies are required and detailed in the consultation response setting out their expectations in terms of CIL bidding process.

Suffolk County Council Archaeological Unit: No objection to the application subject to conditions.

Suffolk County Council Local Lead Flood Authority: No objection subject to conditions.

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Office for Nuclear Regulation: No comments to make

Third Party representations

There 48 letters of support to the application, which are summarised below:

Design

- o There is a lot of community space
- o The dwellings are going to be in a local style
- o This is an attractive site
- o The development appears moderate and reasonable
- o They will be good quality of dwellings, they are spacious, light and peaceful with plenty of storage
- o The development creates peace and tranquillity
- o This will be a low density of development

Highways

- o There is one more access road to the site

Other matters

- o There will be benefit to the local wildlife
- o sustainable construction policy
- o there will be lots of public open space

17 letters of objection to the application which are summarised below:

Principle of development

- o The 50 dwellings stated in the Policy should be a cap for the number of dwellings, 75 dwellings is an additional 50%
- o This application is very similar to the original application (DC/18/2374/FUL) which was rejected by the Local Planning Authority, although there are some alterations in the latest application, the fundamentals are unchanged.
- o The application refers to social housing as being within the their discretion which I understand to be incorrect.

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- o The properties that have been proposed to be built are for the benefit of a closed community and will not benefit local residents/the local community.

Design

- o This will not produce an integrated community or provide housing for the wider population (e.g. first-time buyers).
- o The development proposed seems to be designed for the membership of the Maharishi Foundation (Maharishi Vastu architecture) and not for use by the general population, which will not make the development open for the general public at normal market rates
- o There is a concern in regards of the join between Tidy Road and the new development. The existing join between Sycamore Drive and Garden Close is very unsightly. Furthermore, the style of houses to be built appear to differ greatly from the roads that surround the development. A continuation of the existing style of houses would be preferable to ensure a consistency and a greater flow between the older and newer houses.
- o The proximity of the water treatment plant will concentrate development towards one end of the site and further increase building density.
- o The housing design is not considered to be reflective of Suffolk and the Surrounding area.

Highways

- o One of the accesses is along tidy Road, this is bendy and regularly has parked cars on it so any additional traffic on this would have a detrimental impact for residents and the environment.
- o If the application is approved, then Tidy Road should not be used for construction traffic, any construction traffic will impact this road, this is not a suitable road for this type of traffic to the area.
- o There are already too many cars on the road.
- o There will be safety issues on Tidy Road with the increase of cars.
- o Why does Mayhew Road and Tidy Road need to be used as a new access point when there are already two available entrances via Gardenia Close and Gardenia Square. Given that the existing Maharishi development is virtually a `closed community` the only reason for traffic to be direct this was is to take the traffic away from the Peace Palace and existing Maharishi development.
- o If the roads in the development are unadopted, how will this impact on the infrastructure in Tidy Road and adjoining areas?
- o If planning is granted, it is also unclear from the plan submitted how the existing pavement and road would be joined to the new development and bearing in mind the current Maharishi

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Foundation development, the access point from Sycamore Drive into Gardenia Close is very unsightly and, this poor level of finish should not be applied to Tidy Road.

- o The applicant makes it clear that there are going to be elements of the development that are not adopted therefore not having to bring them to an acceptable standard and therefore impact on the future and new residents of the site.

Flooding and Foul Water Drainage

- o Flooding on the proposed site and surrounding areas into Tidy Road will be a continuing problem which does not seem to have been fully addressed by details in the plan.

- o There has been at least three occasions of flooding since 2010 to the front and rear gardens of 19 Tidy Road.

- o The field where the development is to take place has been flooded many times, there has been observed large amounts of water on the field on numerous occasions, particularly during the winter.

- o The current sewer would go underneath a number of the proposed properties and require a significant amount of work to relocate, it is not deep enough to be built over which would be at a significant cost yet the detail on this proposal is completely lacking including the impact of such a move.

- o There are considered to be inconsistencies through the flooding report that has been proposed in this application for the drainage and foul water that has been provided in this application. There are also elements that are going to need to be defined prior to determination.

- o The applicant makes it clear that there are going to be elements of the development that are not adopted therefore not having to bring them to an acceptable standard and therefore impact on the future and new residents of the site.

Archaeology

- o The archaeology report states the site is of medium to high interest and requires a major dig, how is this going to be funded given its historic value to the community.

Other matters

- o The social infrastructure should be in place before the development commences - this development will not be providing enough doctors, schools

- o They are going to be expensive properties

- o There is no provision for affordable dwellings

- o There is wildlife on the site which will be impacted on by the development, the wildlife that has been seen include bats, deer, kestrels, buzzards, woodpeckers, pheasants and many different owls.

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- o The years of construction is not acceptable, there will be at least three years worth of disruption to the area.
- o Capital Community Developments does not appear to currently have funds to complete the development and we would ask where the funds are coming from.
- o Longer term, we are worried that the proposed development will not be sustainable, particularly if the estate is private, and ongoing maintenance issues (roads, water etc) are not in the hands of the local authorities.
- o The police report in the previous application around designing out crime appears to be wrongly dismissed in this application based on what the applicant states as a no crime zone at the moment. The police are not looking at the crime today but potential crime in the future as the village grows so this I understand would remain valid.

CIL and S106

- o These appear to be used as a carrot for the application to be supported which is not appropriate and misleading as is setting out what this will be spent on which is outside of the control of the applicant .
- o There is a concern that CIL and S106 monies will not be paid for the development.
- o They also refer to the New Homes bonus and S106 will also be made available to the local community, but how can this be ring fenced for Rendlesham and miss leading to the public.

The commercial viability of the development is un proven and therefore not acceptable

Full comments from all of the consultees above can be viewed on the East Suffolk Council Website.

Planning Considerations

Policies

Section S38(6) of the Planning and Compulsory Purchase Act 2004 states that the planning application is to be determined in accordance with the development plan unless material consideration indicates otherwise. .

East Suffolk - Suffolk Coastal District Local Plan - Core Strategy and Development Management Development Plan Document (adopted July 2013) policies:

Strategic Policies:

- o SP1a - Sustainable Development
- o SP1 - Presumption in Favour of Sustainable Development
- o SP2 - Housing Numbers and Distribution
- o SP3 - New Homes

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- o SP11 - Accessibility
- o SP12 - Climate Change
- o SP14 - Biodiversity and Geodiversity
- o SP15 - Landscape and Townscape
- o SP16 - Sport and Play
- o SP17 - Green Space
- o SP18 - Infrastructure
- o SP19 - Settlement Policy
- o SP27 - Key and Local Service Centres

Development Management Policies:

- o DM2 - Affordable Housing on Residential Sites
- o DM3 - Housing in the Countryside
- o DM19 - Parking Standards
- o DM20 - Travel Plans
- o DM21 - Design: Aesthetics
- o DM22 - Design: Function
- o DM23 - Residential Amenity
- o DM24 - Sustainable Construction
- o DM25 - Art
- o DM26 - Lighting
- o DM27 - Biodiversity and Geodiversity
- o DM28 - Flood Risk
- o DM32 - Sport and Play
- o DM33 - Allotments

Site Allocations and Area Specific Policies January 2017:

- o SSP2: Physical Limits Boundaries
- o SSP12 - Land west of Garden Square, Rendlesham

The Suffolk Coastal Local Plan Review

The Suffolk Coastal Local Plan review Final Draft Local Plan (January 2019) has been submitted to the Planning Inspectorate for Examination. It has been stated by the Inspector that the Hearings are to take place in August. Due to the stage of the Local Plan, the following policies are to be considered in this application and detailed through the report.

- o SCLP3.1 - Strategy for Growth in Suffolk Coastal District
- o SCLP 3.2 - Settlement Hierarchy
- o SCLP 3.3 - Settlement Boundaries
- o SCLP 3.5 - Infrastructure Provision
- o SCLP 5.1 - Housing Development in Large Villages
- o SCLP 5.8 - Housing Mix
- o SCLP 5.10 - Affordable Housing on Residential Developments
- o SCLP 7.1 - Sustainable Transport
- o SCLP 7.2 - Parking Proposals and Standards
- o SCLP 8.2 - Open space

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- o SCLP 8.3 - Allotments
- o SCLP 9.2 - Sustainable construction
- o SCLP 9.6 - Sustainable drainage systems
- o SCLP 9.7 - Holistic Water Management
- o SCLP 10.1 - Biodiversity and Geodiversity
- o SCLP 11.1 - Design Quality
- o SCLP 11.2 - Residential Amenity
- o SCLP 12.62 - Land West of Garden Square, Rendlesham

However, they are considered to have limited material weight and will not be determining this application at this stage but should be taken into consideration.

The Rendlesham Neighbourhood Plan (2015).

Rendlesham Neighbourhood Plan identifies this site under objective 3, it shows that this area is an outstanding allocation for development at the time of the Rendlesham Neighbourhood Plan being made. The Neighbourhood Plan objective shows that Policies in the Core Strategy will determine the number and the constraints to the site, this was then taken forward through the Site Allocations and Area Specific Policies DPD policy SSP12 as stated above.

Planning Considerations

Principle of Development

The proposal site is located within the Rendlesham Physical Limits Boundary, which is identified by Policy SSP2 (Physical Limits Boundaries) of the Site Allocations and Area Specific Policies document, this is a Key Service Centre as defined in the settlement hierarchy in Policy SP19 (Settlement Policy). Therefore Policy SP27 (Key and Local Service Centres) is to be applied to the application, which states that housing will be permitted within defined physical limits of Key and Local Service Centres.

The proposal site is also identified within Policy SSP12 (Land west of Garden Square, Rendlesham) of the Site Allocations and Area Specific Policies document, this identifies that approximately 50 dwellings will be provided within the site as long as it conforms with the other elements of the policy, which are to be covered in the rest of this report.

This proposal is for the development of 75 dwellings within the site, this is greater than the 50 stated by the policy by an extra 50%.

Discussions have been held with the developer, that it may be possible to increase the numbers of dwellings on the site as the policy states that 50 is an approximate figure, provided the scheme is acceptable in all other respects and material planning considerations, which are to be discussed through this report. If the material planning considerations are not acceptable then the housing numbers would need to be reduced and also ensure that it is acceptable in all other respects.

The Council's Housing Land Supply Statement (June 2018) (covering the former Suffolk Coastal area) demonstrates that the Suffolk Coastal area has a 5 year housing land supply and that the position of having at least 5 years supply of housing land has been upheld at subsequent appeals.

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The later appeals have considered later iterations of the housing need figure as calculated under the standard method, which have been higher than the figures used in the 2018 Housing Land Supply Statement and are closer to or greater than the Local Planning Authorities current housing need figure of 542 dwellings per year. The figure of 542 is as calculated using the standard method under the current PPG. This figure is for Suffolk Coastal (not for the Local Planning Authority as a whole). They have also tested the deliverability of supply sites with Inspectors concluding that a supply in excess of 5 years exists.

As the Local Planning Authority can demonstrate a 5 Year Housing Land Supply, it is considered that any development proposal on allocated sites will need to be determined in accordance with the relevant site allocation policy for that site. In this instance Policy SSP12 is to be applied to the application, therefore it is recommended that this development should conform to the approximately 50 houses as required within the Policy.

At this point the proposal does not meet the requirements of the Policy SSP12 as it is for 75 dwellings not 50 dwellings, therefore there is a principle objection to the allocation. The proposal is not compliant with Policy SP1 Core Strategy, and Policy SPP12 of the Site Allocations and Area Specific Policies. As this does not make it unacceptable in its self, all other matters are to be discussed below.

Policy SCLP 3.1 of the emerging Local Plan states that there will be a significant boosting in the supply of housing, the mix of housing available and the provision of affordable housing, through the delivery of at dwellings through the plan period as set out in the plan. Policy SCLP 3.2 of the review then locates these dwellings that are to be provided within the Physical limits boundaries and site allocations, unless the development meets other policies in the Local Plan. Rendlesham is identified as a Large Village in Policy SCLP 3.2, which is therefore considered to be a sustainable location for development.

This proposal is located as part of an allocation that is identified through Policy SCLP 12.62 of the emerging Local Plan. The site is also within the settlement boundary as identified by emerging Policy SCLP 3.3 of the review.

Emerging Policy SCLP 5.1 refers to the development of houses in larger villages (which Rendlesham is identified as), it states that residential development will be permitted within defined Settlement Boundaries where it is of a scale appropriate to the size, location and character of the village.

This is considered to be an appropriate location for residential development as it is an identified site, but there is a concern on the function, layout and the design of the site, which is to be considered below.

The proposal is located within the site allocation of SCLP12.62 of the emerging Local Plan It is considered that the proposal does not conform with Policy SCLP12.62 on all points, under part d) the design, layout, mix and type of housing is not compatible with the 'made' Rendlesham Neighbourhood Plan.

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The remaining greenspace is for a mix of informal open space which may be suitable for dog walking, but will not be easily accessible by the future residents of the site due to the poor links around the site. The layout plans do not demonstrate a dog walking or recreational route around the site. There are no allotments or orchards proposed within the development, this is a requirements of the Rendlesham Neighbourhood Plan policy RNPP3, and Policy SCLP12.62.

SCLP12.62 recognises the sewers crossing the site and this alignment of these is clearly set out in Enclosure 5 of the Design and Access Statement. With particular regard to the sewer passing east-west across the site, this is currently below the proposed location of plots 19, 21, 24, 25, 28, 29, 31, 35, 38 which accommodate 20 units. The application suggests the sewer will be relocated but provides no detail on where or how. The relocation of such a length of existing sewer is a significant infrastructure burden on a site of this scale and the ability to undertake this work should be demonstrated as part of the application in order to show that the proposed layout can be achieved. Without this certainty the deliverability must be questioned and it does not comply with Policy SCLP12.62 in that respect.

Affordable Housing, Open Market Housing and Housing Mix

Policy SP3 (New Homes) requires a mix of different bedroom properties, the below table states the required mix and the proposed mix.

Bedrooms			1	2	3	4+	Total
Open Market Housing (50)	3	16	20	22	50		
Affordable Housing (25)		11	7	4	3	25	
All Sectors (75)			10	24	26	15	75
Proposed Development (75)	14	27	20	14	75		

As set out above, it is considered that overall the proposed development would provide an appropriate amount of one bed properties, more two bedroom properties than the minimum required, an appropriate number of three bedroom dwellings and less four bedroom properties than are required by the Policy SP3.

This is an allocated site for 50 dwellings (SSP12) located on the edge of Rendlesham, which is a sustainable location. Therefore the housing mix should be further aligned with Policy SP3.

Policy DM2 (Affordable Housing on Residential Sites) of the Core Strategy requires that there are one in three affordable houses required on this site, as it is above 0.5 hectares in size and above ten dwellings (as per the thresholds set out under paragraph 63 of the NPPF).

The applicant has offered 25 affordable dwellings (which is policy compliant) and has agreed that 12 (48%) of the affordable units would be affordable rented and 13 (52%) of the affordable units would be for discounted market sale. This could be acceptable within the Parish of Rendlesham. However, there is no indication within the application which properties are to be affordable. Therefore it is unclear what the sizes, locations and designs of the units would be.

The Council's Head of Housing has advised that the affordable dwellings are at the following mix:
12 Affordable rent, comprising:

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1 bed flat - 4
1 bed bungalow - 2
2 bed houses - 3
3 bed houses - 3

13 Shared Ownership and Discounted open market comprising:

2 bed houses - 7
3 bed houses - 6

It has been recommended by the Head of Housing that the 13 units for discounted market sale should be provided with six of these for discounted market sale/fixed equity and seven for shared ownership. This would be closer to the mix that has been identified in the Strategic Housing Market Assessment 2017 (SHMA).

From the mix stated above as recommended by the Head of Housing, there would need to be a re-design of the dwellings on the site in order to meet the required housing mix for affordable units. For example, both of the bungalows are proposed as three bedroom properties. There are no two bedroom houses, just maisonettes and flats. As a Full application the specific affordable units should be shown on the submitted layout plan.

The original submission did not include draft heads of terms for a s106 agreement and a draft S106 was submitted to the Local Planning Authority in the later stages of the application process. As it is considered to be at a draft stage it does not have enough detail nor has it been negotiated to agree the split of affordable dwellings, the wording of the s106 and how this is going to be allocated to a registered provider. The draft s106 is noted but due to the other issues with this application it cannot be progressed further in negotiation and will remain unsigned at the time of the decision. A reason for refusal for the lack of a signed s106 to secure affordable housing and other obligations is therefore a reason for refusal. It is possible that a s106 could be agreed and signed post decision should the application progress to appeal.

The design, form and function of the site is discussed below, however, this development would have a bespoke design and form not typical of affordable housing units usually made available as s106 properties in the area. Considering that registered providers bid for s106 properties and prices paid a generally cost price only there is no information within the supporting information to demonstrate that the bespoke housing design and form would be acceptable in terms of accommodation to Registered Providers and also what service charges they might be expected for the maintenance of the shared spaces and unadopted roads. Due to the bespoke design of the scheme/buildings additional reassurance should be provided by the applicant to demonstrate that this would be acceptable.

Throughout the site all of the proposed properties are proposed to face east, there is no variation on this through the site. There is no justification in the application to why all of the properties are to face east and why there is no variation through the site. There is a concern that the proposed layout/rigid orientation of the site is only going to be appropriate for a small section of the housing market, and that it results in a number of other issues related to visual and residential amenity (explored in later sections of report). There is no justification in the applications

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supporting statement for the proposed layout and orientation of the dwellings. The houses should appeal to all sectors of the housing market and be designed around good urban design principles..

The proposal is not considered to be in conformity with Policy SP3 and DM2 due to the lack of information that has been submitted to the Local Planning Authority.

Emerging Policy SCLP 5.8 requires that as there are more than 10 units proposed on the site, at least 50% of the dwellings need to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations, and will be required to demonstrate how the proposal contributes to increasing the choice and mix of housing available for the older population. From the information that has been provided within this application, the scheme would not include the required accessible and adaptable dwellings. Therefore this scheme is contrary to emerging Policy SCLP 5.8, however this cannot be a reason for refusal at this point in time.

Design and function of the site

The design and function of the site, external appearance of buildings/form/detailing, internal building layout, building functionality formed a refusal reason for application DC/18/2374/FUL and has been raised in both of the previous pre-applications. The external appearance of buildings/form/ detailing, internal building layout, building functionality is also not considered to be acceptable in regards of this application.

Both the NPPF in section 12 and Policy DM21 of the Core Strategy refer to the need to have good design.

NPPF paragraph 129 refers to assessment frameworks such as Building for Life 12 (2015) (BFL12) and how they should be used in assessing applications and that Local Planning Authorities should have regard to the outcome from these processes. As a Local Planning Authority we are moving towards using BFL12 as the assessment framework for the design of developments. This is adopted policy in the area of East Suffolk covered by the Waveney Local Plan and is part of the emerging local plan (Policy SCLP11.1 - Design Quality) for the former Suffolk Coastal area and is a nationally recognised assessment framework.

Policy DM21 of the Core Strategy is most relevant to the consideration of the design of this development. The Policy refers to the need for proposal to be well related to the scale and character of their surroundings, and that the form, density and design of proposals should create a new composition and point of interest, which will provide a positive improvement in the standard of the built environment of the area generally. Layouts should incorporate and protect existing site features of landscape, ecological, heritage or amenity value as well as enhance such features. Also attention must be given to the form, scale, use, and landscape of the spaces between buildings and the boundary treatment of individual sites, particularly on the edge of settlements.

The BFL12 document has similar mean aims and objectives to that of Policy DM21, the document is to be used to structure this element of the delegated report as it helpfully sets out a wide range of material planning considerations irrespective of the policy position. Both the NPPF and Core Strategy will be used to assess these different elements.

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1. Connections - Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones, while also respecting existing buildings and land uses around the development site?

It is considered that the main vehicular entrance into the site, due to the distribution of properties through the overall site, would be from Tidy Road as the Garden Square entrance is further away from most of the houses. Third party land exists between the adopted extent of Tidy Road and the area that this development is to take place. The applicants have served notice on the owners of this land. However, the Tidy Road access would need to be secured (if permitted) through a Grampian Style condition for implementation prior to commencement of the development. The Garden Square access is a continuation of an unadopted estate road. There are no ownership boundaries to the delivery of this access although the delivery of this route as a public highway leading on to Sycamore Drive is also reliant the unadopted section of Garden Square being adopted. Importantly the ability to secure pedestrian pavement/footways to the existing highway needs to be accommodated in the full extent of adopted highway.

Other pedestrian access to the site is very limited, there is one separate pedestrian route through the Peace Palace, this crosses private land which does not form part of the application site, and is not a Public Right of Way, so cannot be given the weight as a publicly accessible connection.

There are no public rights of way north, east or west of the site. Rendlesham is well known for its very limited range of public rights of way surrounding the village with an no public access into the countryside to the north and limited routes to the south. This is an important consideration later in respect of Habitat Regulations considerations. The Highway Authority response includes a public right of way s106 funding request for a route on the eastern boundary of the site but it is unclear where this would be or lead.

This is a very road dominated scheme, because of the design being proposed in this application traditional perimeter blocks cannot be used. The design creates 10 cul-de-sacs from the main spine road. The Highway Authority has indicated that it would only consider adoption of the main spine road. Other routes with need to be privately maintained and no details of management of those roads has been submitted. That should form part of a management strategy (including public open space) within the s106 agreement.

The new open space and play area is located in the north east corner of the site. It is located within the cordon sanitaire of the waste water treatment plant and therefore there is a concern that this would not be effectively used, due to the potential odour impact on the site. Its value as mitigation in respect of Habitats Regulations and as necessary public open space is therefore in doubt and odour effects have not been adequately addressed in the submission.

This proposal does not demonstrate that it would create a walkable neighbourhood, no pavements other than on the main access roads are proposed to be provided, and there are proposed to be very limited pedestrian paths and in some instances no pedestrian paths between the cul-de-sacs, leading it to be a very car dominated. Specifically Out of the 37 plots only 15 dwellings would be directly accessible from a foot path. All of the other plots can only be accessed by road and therefore car or other vehicle. In some instances, with effective shared surface design such highway layouts can be very suitable pedestrian environments though that has not been

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demonstrated in this case and it is unlikely that such routes would be adopted given current restrictions on the adoption of shared surface roads. Most of the cul-de-sacs serve a small number of dwellings and therefore this is less of a concern but the lack of footways and pedestrians routes through the centre of the site and the western part cause obvious barriers to pedestrian movement.

Due to the cul-de-sac layout the routes through there will be no active frontages adjoining many sections of the roads and pathways. There will be areas that are not well overlooked, especially the main spine road. Houses do not appear to have been designed with regard to their specific plot's relationship to public areas, resulting in elevations with limited or no fenestration adjoining public areas. These include plots 1, 4, 8, 12, 14, 17, 21, 25, 29, 31, 32, 33, 34, 35, 37 and 38

A number of pedestrian routes will pass the rear of peoples homes, others are blocked by car parking spaces. There are spaces within the development where it is not clear if these can be passed through are they public or private. This includes the area to the south of 21 and north of 14. East of plot 4, 8 and 35.

2. Facilities and services - Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?

Services are available in the village centre which is within walking/cycling distance, but as stated above there would be a lack of connectivity, because are many plots would not be served by footpaths. Therefore the residents will need to walk along the road to access a footpath if they are to walk, this does not increase the distance between plots but will increase the likelihood of residents to rely on private motor cars to access services and facilities.

The proposed play area would also be remote from some of the houses in the new development and appear to have been used as part of the Cordon Sanitaire Its currently proposed location also means that there would be minimal active surveillance from properties which could result in both perception of and actual issues with anti social behaviour. The effectiveness of the open spaces overall is poor and it does not demonstrate good urban or landscape design.

There are two areas that are indicated to be feature spaces, but it is not clear, what their purpose would be, who these are going to be available to and what features they are going to have on them. Therefore it is a concern if they will truly serve the new and existing residents.

3. Public Transport - Does the scheme have good access to public transport to help reduce car dependency?

There is currently a bus stop on Sycamore drive which is within walking/cycling distance of the development, when exiting the site from the eastern exit. But there is no indication within the application if there is to be public transport links within the development.

The nearest Train station is Wickham Market Train Station in Campsea Ash, which is approximately 7miles away.

To ensure sustainable travel consideration should be given to providing electric car charging points to encourage sustainable travel choices. Policy SCLP7.2 (Parking Proposals and Standards) of the

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emerging Local Plan states that this is going to be a requirement of any new development. There is no information in the application if this is to be provided or not. Such provision could be secured by condition.

On this matter it is considered that the proposal is acceptable due to the constraints that already exist within Rendlesham and its access to Public Transport. The Highways department have raised no objection to the application on this matter.

4. Meeting local housing requirements - Does the development have a mix of housing types and tenures that suit local requirements?

The housing mix and affordable dwellings have been outlined above, it has concluded that this is not acceptable as the detail has not been provided to the Local Planning Authority, even when it was raised in a previous refusal reason and at pre-application stage.

There is a concern in regards of the size of the dwellings and the mix of properties that this will create through the streetscene. The BFL12 states that "avoiding creating too many larger or too many smaller homes from being grouped together.". This development will create a development of large detached properties, which is discussed further in the character section.

5. Character - Does the scheme create a place with a locally inspired or otherwise distinctive character?

The proposal site would have a wide variety of character, as there are nine styles of dwellings. The external appearance of the properties is considered to be of a high quality and provide detailing and proportions that extenuate this. The properties are to provide large dwellings and flats with a large living areas and internal rooms within them, which are serviced by large windows. It is considered that individually the external appearance of the buildings and their internal layouts are acceptable. However the holistic design approach in terms of the site layout, orientation and position of the dwellings is not acceptable as detailed below.

All of the properties are proposed to face east, therefore any northern, southern and western boundary adjoining a road appear to be an afterthought in the layout and would be bounded by a 1m or 2m high fence and/or hedge to enclose the amenity space associated. Out of the 37 plots (there is no plot 13), the frontages of plots 1, 2, 3, 18, 19 and 35 will only be the frontages or the sides of properties that can be seen. The front and side elevation of the remaining plots when facing a public highway would be screened away, therefore any character that is produced through this development will be hidden from view and not creating an inclusive and active frontage. This contrasts with the approach to the existing adjacent Garden Square development, which is based on the same architectural principles, but where the entrance to the site comes in from the east and therefore the majority of the dwellings are approached onto their frontage (i.e. they provide an active frontage to the road).

The submitted Design and Access Statement explains that the reason for all the dwellings facing east, is to enable the penetration of light through the property in the morning. However, the case officer has undertaken discussions with the applicant through the pre-applications and made recommendations about turning some of the properties, so they are accessed from the west but

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with the same internal room layout to the dwellings, but this has been disregarded in this application. There has been given no justification or reasons given for such a fundamental design influence on the orientation of the dwellings and its significant effect on the overall layout.

There are nine styles of dwellings, two of them are bungalows and the rest from the site layout would appear as detached dwellings that are two stories in height with additional rooms in the roof space, allowing for accommodation over three stories. However, because of the way that they are designed some of the dwellings would actually be semi detached properties (House type Glenham, but the second front door is on the north flank elevation). The Maisonettes design is called Bealings, the secondary entrance is also to the north flank elevation of the host dwelling.

Apartments are proposed in the building types Wilby and Sudbury, these would only have one entrance door, and externally would look like large detached dwellings.

There is a mix of dwelling sizes, but this mix is hidden, within the proposed building forms and orientations, therefore giving no variation in the streetscene of the properties. They would be a mix of design and scale, but on the face value would appear to be an estate of large detached properties, therefore giving insufficient variation in the streetscene, which is not considered to be acceptable.

The variety and mix of dwellings was raised by the LPA during the first application (DC/18/2374/FUL). Within the current application two bungalows have been introduced, which have been given the names of 'Deben' and 'Bramfield'. The latter bungalow is of a contemporary design, which is out of character with the rest of the proposed properties. It doesn't appear to be a statement or landmark property given its prominent position as it has been placed side on. Out of the 75 dwellings there are to be only 2 bungalows, this does not create an adequate mix of properties and any variety to the site.

As detailed above the housing mix is hidden and the layout is not varied enough there will be no features through the site to be able to guide someone around it. There are no landmark buildings or landscape features along the few footpaths or many roads.

Therefore, despite the quality of some of the architectural design of individual buildings, the development on the whole would create a bland development based around the architectural style and the developers principles of building orientation, with all of the properties facing east, rather than well laid out development with poor and little character.

6. Working with the site and its context - Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and microclimates?

This site benefits of being a green field site, as it has only a few elements that are to be considered when it is being design and developed, but it appears that the applicant has not considered all of the relevant factors in this design.

There is an area made available for the cordon sanitaire as an Anglian Water waste water treatment is located next to the north east corner of the site. However, the play area has been

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located within this cordon sanitaire, away from natural surveillance and within an area that has potential odour and noise impacts. There is a concern that this area may not be used to its full potential or used for anti-social behaviour, due its detachment from the proposed dwellings and natural surveillance.

The proposed houses would be situated away from the water treatment plant to the north of the site to reduce any potential negative impacts of the site is to be discussed below, in regards of the impact on neighbouring amenity.

All of the properties are of an external appearance and internal layout that is similar to that of the roads leading off of Garden square, but due to the cordon sanitaire all of the properties are nearer to the properties accessed from Tidy Road. The existing properties in Tidy Road do not appear to have influenced the external appearance or layout of the proposed scheme. All of the existing properties within Tidy Road face their access road, and have a mixture of forms and layouts. Whereas the proposed properties do not, as detailed above.

It is considered that the main entrance into the site, due to the distribution of properties through the overall site will be from Tidy Road, and the un-adopted nature of the other access road. The approach into the site from Tidy Road is not satisfactory, people will be presented with a long expanse of 2m high fencing rather than attractive dwellings with an active street frontage.

There needs to be a focal point at the end of the main spine road to catch the eye as you approach down the road (east to west) as you approach the site from the Garden Square entrance. Despite this being a Full application there is no detail at this stage about the 'feature space' and such a concept should have been a leading influence of the urban design of the site. This is the same for the second feature space indicated next to plot 15, which would be a feature when traveling north to south towards the Tidy Road entrance.

The finer detail of the site has not been provided considering this is a full planning application, which includes the SUD's features how are these to work in the landscape and the context of the site. Overall the layout plan is poor in demonstrating how the site will be designed.

7. Creating well defined streets and spaces - Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well?

The BLF12 guidance refers to creating streets that are principally defined by the position of the building rather than the route of the carriageway. Due to the desire for the front doors to all the properties face east the layout is very restricted. Each house ends up facing onto a shared driveway with cars parked directly in front of properties, creating a car dominated environment. There is a limited number of actual 'streets' with only plots 1,2,3, 18 and 19, out of the 37 plots, facing onto a main/through/spine road, the rest face onto a cul-de-sac, even when they do face a road. The dwellings are set well back behind parking and front gardens. The street frontage, along the main road, will therefore become hedging and boundary treatments. As previously mentioned, this contrasts with the approach to the adjacent Garden Square development based on the same architectural principles where the entrance to the site comes in from the east and therefore all dwellings are approached onto their frontage.

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None of these buildings would turn corners as requested in the BLF12 guidance, there are windows situated on flank boundaries, these are secondary windows (in some instances) but would be obscured on the ground floor by 2m high fences.

As there is no distinction between the different dwellings and the roads there is no pattern of road type, leading from one area to the other, users would either on the main spine road and loop road or on a cul-de-sac leading to dwellings. There is no mixture or distinction and hierarchy through the site.

The guidance states that the following should be avoided "Over reliance on in front of plot parking that tends to create over wide streets dominated by parked cars and driveways unless there is sufficient space to use strong and extensive landscaping to compensate the lack of built form enclosure." This is exactly what has been provided on the site for car parking for all of the properties.

8. Easy to find your way around - Is the scheme designed to make it easy to find your way around? There are very few landmarks through the site, there are no key buildings or features. The only features are the green spaces at the north east, west of the site, adjacent to plot 15 and the flats (2 storeys) plots 12, 14, 21 and 20.

Plots 18 and 19 will view the rear elevations of plots 12, 14, 21 and 20, but not their front views. Plot 15 and 17 will only view the smaller feature space adjacent to plot 15. No properties are looking over the main feature space to the west. Only 30, 31 and 35 will overlook the play space and the main feature space to the north east corner of the site.

The following plots will have no view of any of the feature spaces considered above. Plots 1-12, (there is not a plot 13) Plot 14, plots 16, plots 20-29 and Plots 32-38.

As previously mentioned the key view into the site from Tidy Road has not been taken advantage of, this should be the gateway to the site with buildings directly addressing this approach instead of the side elevations and high fences proposed. It would appear that the feature space on the west end of the site is built or made use of, this would only be appreciated when traversing from garden square towards the west of the site.

The development is a series of uniformed cul-de-sacs rather than a connected network of streets and spaces, which does not make it easy to locate which cul-de-sac a visitor would be on.

Other elements that have not been considered are shared surfaces, which can be difficult for people with visual impairments. Out of the 37 plots only 15 dwellings will be accessible from a foot path/pavement, all of the other plots can only be accessed by road and therefore primarily through the use of a car. This is not an easy way to find your way around if you are made to be dependant on shared surfaces and a resident is visually impaired.

9. Streets for all - Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?

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There is no objection to the proposal from the County Council Highways Officers in regards of the speed through the site, however as only 15 plots out of the 37 proposed in this application are only accessible by both car and footpath. The rest of the properties are to be accessible by only car, or a shared path, but is not considered to be wide enough to accommodate both a car and pedestrians on the site access road for the amount of properties that these roads are to serve. This arrangement is not acceptable.

It is considered that the main entrance into the site, due to the distribution of properties through the overall site would be from Tidy Road (south east corner of the site). For the properties on the western side of the development to access the greenspace and the play area, the residents will need to walk along the shared spaces road to access the foot paths then to access the green spaces or the rest of Rendlesham and the community facilities within it.

The natural surveillance through the site is very poor, comments have been received from the Designing Out Crime Officer on this application. They have significant concerns in regards of the lack of natural surveillance, the location of public areas in relation to private spaces and the amount of blind spots throughout the site, the boundary treatments around the properties and their relationships to one another. These comments and concerns were raised through the original application as a refusal reason and the two pre-applications and have not been addressed through this new application. This unconventional layout and specific arrangement of properties does give rise to greater risk of perceived and potentially actual crime issues than a typical residential layout.

As already stated above there is no active streetscene that is going to be provided through this application, this development will be creating a bland development with little character, due to the orientation of the properties and the proposed boundary treatments impacting upon the streetscene. Therefore creating a poorly designed development.

10. Car parking - Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?

The car parking provided on the site meets the Suffolk County Council Highways parking standards, but this is a dominating feature along the cul-de-sacs. There is no mix of parking provision through the site, there are only 6 garages for 6 of the plots, with the remainder being off road in plot parking. This is either to the front of the properties or to the rear of the properties. The streets are not wide enough to accommodate on street parking.

There is no parking down the flank of the properties it is all to the front of the dwellings, this is not a good design feature of the site, as the streets would be vehicle parking dominated, which is detrimental to visual amenity

The BFL12 guidance states that the following should be avoided "Over reliance on in front of plot parking that tends to create over wide streets dominated by parked cars and driveways unless there is sufficient space to use strong and extensive landscaping to compensate the lack of built form enclosure." This is exactly what has been provided on the site for car parking for all of the properties.

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11. Public and private spaces - Will public and private spaces be clearly defined and designed to be attractive, well managed and safe?

In between the properties, along the site of roads and pockets through the site are areas of green space, there is no indication of who is going to maintain these areas, it is also unclear where the private and public area starts and finishes. This uncertainty does not assist in the confidence that this site is going to be well maintained for the whole life of the development.

The green spaces that are provided are not well overlooked. There are left over green space's by plots 14 and 21, and there is no indication of what this is going to be used for, or how it would be maintained.

The play space area to the north east of the site does not show which age group this is going to be for and what is going to be located in there. Broad details relating to this information would have been expected with the submission of the application, with the final detail to be submitted to the Local Planning Authority as a condition.

12. External storage and amenity space - Is there adequate external storage space for bins and recycling as well as vehicles and cycles?

It is not clear who is going to use the bin storage that is located through the site, in some instances this is located to the rear of a boundary fence that is the boundary of a very small residential garden. It has also not been made clear if the bins are going to be collected by the waste collection lorries, and/or where this is going to be collected from, as there are no presentation areas identified.

The bike storage is remote from the flats (especially plot 14 and 21) and is not well overlooked, this would make it inconvenient to use and create concerns for users in terms of security. . The rear amenity space on some of the plots is limited in depth and there are no garages or shed, therefore there would be no outside storage places for bikes and other items on many of the dwellings.

When reviewing the proposal against the Building for Life 12 (2015) guidance it comes out with the following score

- Green - 1
- Amber - 4
- Red - 8

The only green element is public transport, however, though this relies on secured publicly accessible footway connections being delivered, all other elements are considered to be red or amber.

The guidance states that developments should aim to secure as many greens (detailed can be found in the guidance) as possible, minimise ambers and avoid reds. A red light gives a warning that a particular aspect of the development needs to be reconsidered. A development needs to secure 9 'greens' to be 'Built for Life' accredited. This development falls well short of the standards set out in in BFL12 and this paragraph of the NPPF 129 states that we should have regard to this outcome. Whilst BFL12 is only currently referenced in emerging policy is a well acknowledged to

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tool for applying consideration to comprehensive urban and community design principles and this assessment is therefore of value in the determination of this application.

The NPPF paragraph 130 states that "Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents".

The test in this paragraph is quite high stating that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

The Rendlesham Neighbourhood Plan refers to objective 3a) (Type and Design) states that there is to be a healthy mix in the type and design of the house that is built. Housing should have a sustainable mix as identified in Appendix N of the Rendlesham Neighbourhood Plan.

Rendlesham Neighbourhood Plan 3c) (Street Scene) refers to the streetscene as being an important part of the development.

Objective 4 (Allotments, Orchards and Growing Places) and Policy RNPP3 both show that there is a deficient of allotments within the village. This application does not make a provision for an allotment within the site, nor is there an indication in the supporting information that a provision will be provided for this through the development of the site.

As stated above the proposal does not have a healthy mix of properties, nor an attractive streetscene. Therefore the proposal is not considered to be in conformity with the Rendlesham Neighbourhood Plan Policies, also a provision of allotments is not proposed, nor a justification of why this should not be provided on the site.

Policy DM21 of the core strategy ensures that there is a high quality development provided, if the development comprises of poor visual design and layout, or otherwise seriously detract from the character of their surroundings it will not be permitted. Any new development will be expected to establish a strong sense of place, using streetscenes and buildings to create attractive and comfortable places to live and visit. This development is considered to fail on all of these points. Therefore the proposal is not considered to be in conformity with Policy DM21 of the Core Strategy.

Paragraph 127 of the NPPF seeks to ensure that the function and overall quality of the area is not just for the short term but over the lifetime of the development. The development should be visually attractive and a result of good architecture, layout and appropriate and effective landscaping. The dwellings should be sympathetic to local character and history, including the surrounding built environment, establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit, create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future

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users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

As detailed above this has not been achieved, but has been brought to the attention of the developer at both of the pre-application stages and in the previous refusal of the application on the site. The proposal does not meet the requirements of the NPPF in regards of design, crime and overall function of the site.

All of the properties face east, and they have small gardens and large dominating boundary treatments. There is no justification within the supporting information of this application to demonstrate why this layout of development is required or such dominant personal design principles are necessary. When asking the applicant why the dwellings are to face east the response is that if they are to face west you will be turning your back to the sun when entering a property, allowing them to face east ensures that you face the sun when entering or leaving a property. This is not considered to be a material planning reason to justify the proposed layout and its effect on the quality of the layout is significantly detrimental.

There are already 50 dwellings that have built in this style and nature to the south east of the site though in that development a more cohesive approach between building and estate layout design was adopted. There is no material justification or information put forward as to why this needs to be duplicated in this location, and/or why a similar layout to that scheme with a less linear road layout could not be adopted on the current application site. A previous refusal reason in application DC/18/2374/FUL was because of the concern that this development would not be aimed at the open market. The same concern remains with this application as no clear justification has been provided for the unusual layout.

The 5th bullet point of Policy SSP12 of the Site Allocations and Area Specific Policies refers to the need to have a design, layout, mix and type of housing proposed is compatible with the housing and transport objectives set out in the 'made' Rendlesham Neighbourhood Plan, this refers to Objective 3a of the Rendlesham Neighbourhood Plan. As there is no affordable housing mix and the plots have not been specified within the application, as stated above it is considered that this is not acceptable in regards of the Rendlesham Neighbourhood Plan and Policy SSP12 of the Site Allocations Document.

In summary it is considered that the development is not in accordance with the NPPF and the Core Strategy. There has been an objection raised to the application from the East Suffolk Design and Conservation Officer.

Local and National Policies both require a development to create a socially inclusive development through a well designed and safe built environment. Therefore the application is being recommended for refusal on the matter of design and function, also the development not being for the open market and therefore not socially inclusive.

Impact on Residential amenity

The layout of the site is proposed in a grid formation, with the front elevations of the properties facing east and the gardens to the west. The majority of the properties are two storeys in height,

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with additional accommodation in the roof and windows on all elevations and rooflights. Only two of the properties on the site are proposed to be bungalows. Surrounding the properties are proposed either 2m or 1m fences, this is mixed through the site, there is a detailed plan showing all of these.

As detailed above there are a variety of housing types through the site and because of this there are a variety of windows and height of properties.

The main concerns are the lack of private amenity space, overlooking and overshadowing between properties. These concerns were raised through both of the pre-applications and the first application. One of the refusal reasons of the previous application was on this matter.

Out of the 37 plots that would contain the 75 dwellings, there are proposed to be 16 plots with a rear garden depth that would be less than 5m. Of these 16 plots, 9 of the plots would contain more than one dwelling on the site (e.g. flats and maisonettes), which includes up to 5 flats. One of the plots (Plot 15) has a 1m deep garden onto a 1m high fence. The plots that contain a single dwellings have three bedrooms and above, which is not creating a garden space that would be adequate for the amount of bedrooms within the properties.

This is not an acceptable standard of living on a green field site that is being designed with few constraints through the site. The amenity space is not acceptable and it would be expected to be larger for the size of the properties and the amount of potential residents within the dwellings. One resolution for this would be to reduce the amount of dwellings on the site to be able to increase the amount of living space.

Due to the small amenity spaces, in 11 of the plots there will be habitable rooms that look out onto a 2m high flank fence. In some instances this is the only window for this room, or the main window for the room. There is only 1m to 3m between the fences and the flank windows, which are on the north and south flanks of the properties, therefore in some instances blocking out the majority of the sun throughout the day to these habitable spaces.

The ground floor flat in Plot 15 is going to be completely overlooked. It is surrounded by a 1m high fence on all boundaries, to the east of the site is a pedestrian route through the site and to the west is an access road to Plots 15 and 16. There is 1m to 2m between the dwellings and the fence. This is not acceptable as there would be direct overlooking to the property from the public spaces. Therefore there would be no privacy for the ground floor flat, where all of the rooms are on the ground floor. This is not acceptable and will be directly overlooked.

Plots 12 and 21 would have bedroom 1 and a kitchen on the ground floor that is next to a 1m high fence and a public foot path leading towards the western feature space, these are proposed as the only windows for these habitable rooms.

Plots 14 and Plot 20 would have a dining room on the ground floor, which also face a 1m high fence and a public foot path leading towards the western feature space.

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There are 17 out of the 37 plots which would not have a dwelling directly to the south of it. As all but two (which are included in the 17) of the dwellings are two storey dwellings and the plots are detached from each other, they are considered to be close enough to each other to cause overshadowing on the 20 plots. Due to the layout of the dwellings on the site if there is a property to the south of the host dwelling there will only be light in the late evening as there is a staggering of the dwellings to overcome some of the overlooking issues. This is not an acceptable amount of overshadowing, on either the rear amenity space or habitable windows.

Due to the close proximity of the properties and their scale, with windows on all elevations of the building there will be overlooking between properties. Which are detailed below, some of the properties are staggered, so there will not be direct overlooking, but it would be close enough to cause concern at the overlooking between properties:

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

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

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

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

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

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

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

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

The Wilby style dwelling is proposed to have a flat on the 3rd floor, which is only served by rooflights and two dormer windows (these do not serve habitable spaces), this is not a positive outlook for the future residents of this dwelling. This type of dwellings is on plots 18, 19, 34 and 35. Which is not acceptable.

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There is a particular concern in regards of plot 15 and the potential overlooking that this is going to cause to 5 Peace Palace Gardens. The separation distance between these two properties would be 15m, from the front elevation of the proposed dwelling to the rear elevation of the current property. Therefore the windows on the front elevation will directly overlook the rear garden amenity space and windows of the neighbouring property.

All of the properties within the proposal site are east facing, therefore the front of the dwellings will face into the rear gardens of the properties to the east. There are different heights and styles of building, as they are all (apart from 2 bungalows) three floors in height, the separation distances are at a minimum of 20m. There is a concern of some overlooking from the third storey elements of the buildings into the rear gardens of the neighbouring properties. But this has been an improvement from the previous application and pre-applications.

Anglian Water has raised the concern of the odour impact of the Anglian Water Treatment Plant to the north east corner of the plot and wish for a detailed assessment to be carried out. The assessment that has been provided states that there would be no harm to the amenity of the new residents, but this appears to have been modelled on an old site location plan, hence Anglian Water asking for more details.

East Suffolk Environmental Protection Officers have asked for more detail is required on the noise of the site.

If this application is to be recommended for approval it is recommended that additional work is undertaken to understand the impact on the dwellings as required by Anglian Water and East Suffolk Environmental Protection Officers.

Paragraph 127 part f) states:

"create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."

Policy DM23 of the Core Strategy ensures that Privacy/overlooking, outlook, access to daylight and sunlight and the resulting physical relationship with other properties are considered when determining a planning application.

This proposal will not create a high standard of amenity for existing and future users of the site due to the lack of amenity space, overlooking and overshadowing. This is due to a poor relationship between the properties on the site, windows being located on the flank elevations, where these are the only windows for habitable rooms, therefore creating overlooking. Poor boundary treatments which will dominate plots and obscure habitable room windows. Small amenity space for the size and scale of the dwellings that are being proposed.

The BFL12 under part 12 (External storage and amenity space) states that "It is a good idea to ensure that rear gardens are at least equal to the ground floor footprint of the dwelling. Triangular shaped gardens rarely offer a practical, usable space. Allow residents the opportunity to access their garden without having to walk through their home.". This is not the case as 37 plots that

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contain the 75 dwellings, there are 16 plots that have a garden size that is less than 5m from the rear elevation of the dwelling to the 2m high fence to the rear of the property. There are other dwellings on the site which also have a small rear amenity space, which is less than the floor area of the ground floor.

The proposal does not conform with Policy DM23 of the Core Strategy, BFL12 and the NPPF and should be recommended for refusal on this basis.

As stated above there will be harm to the amenity of the future and current residents of the site, there will be overlooking, no privacy, reduced access to daylight and sunlight, poor relationship between other properties and poor safety and security. Therefore the proposal is not in conformity with Policy SCLP11.2 of the emerging local plan.

Highways and Rights of Way

Suffolk County Council Highways commented on the application they have stated that the development will not negatively impact upon the surrounding highway network with regard to traffic flows. Further clarification has been provided to state that both of the accesses start on adopted roads, either from Tidy Road or Sycamore Drive as Garden Square is not an adopted road and it is understood that this remains unfinished and un-adopted as a result of a non payment of an S106 obligation on the Garden Square development.

There were points raised in the previous application which have been addressed through the application. However, there are some of the roads within the application would not be suitable for adoption by the Local Planning Authority. A section 278 agreement would be required to link the development access road to Tidy Road, where minor dropped kerbs improvements on Tidy Road will also be required. Conditions have been recommended by the Highways Officers. Due to the lack of continuous ownership to that road and the necessity of a public route into the site prior to first occupation, this should be secured through Grampian style condition (if permitted). This would conflict with the indicated approach to phasing in the Design and Access Statement which oddly suggests that the development would come forward off the Peace Palace site and without a vehicular access route via either of the proposed routes.

In the previous application the Suffolk County Council Rights of Way Officers comment on the application, they have not commented on this proposal. But it is considered that their recommendations are carried on into this proposal, which are the following. A bridleway is to be created along the track which runs along the eastern side of the site, as this would link the estate to the wider countryside. This is as the Rendlesham estate is currently poorly served in terms of public rights of way and access to the countryside, this link would help to fill that gap for this development and the wider estate. There is no doubt that such a right of way route would benefit the wider community, however funding of a creation agreement/order does not guarantee delivery of such a route, particularly as such a route could be contentious with landowners. The Rights Of Way Team have not been clear in the specific location of this route and it is currently unclear as to whether this should be secured as a s106 obligation or funded through CIL.

Through the development there are to be limited footpaths creating connections through the site. This proposal will fail to enhance the existing foot paths by reducing the connections through the

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site. There is no proposal of having a public right of way through the proposal nor additional cycle networks. The proposal is not considered to be in conformity with Policy SCLP 7.1 of the emerging Local Plan, however, there is no objection on the application from Suffolk County Council Highways on the impact from the development to the existing transport network. Therefore there are elements of the application that can be improved.

The amount of parking is considered to be acceptable in regards of Policy SCLP 7.2 of the emerging Local Plan, but there is no demonstration through the application if there are proposed to be electric charging points provided in each of the properties. Therefore there is some conflict with this policy.

Surface Water Drainage

Comments have been received from the Suffolk County Council Flooding Officer and the submitted Flood Risk Assessment. It is considered that the proposal is acceptable subject to conditions being applied to the application if it is to be recommended for approval.

The proposal is located within Zone 1, therefore there is no identified risk of fluvial or tidal flooding.

Anglia Water have provided their comments on the application, they have requested further details are to be provided through a detailed odour risk assessment. This is to establish the range at which the amenity of dwellings is likely to be impaired.

There are pipes and other Anglian Water assets that cross the development site, both east to west and north to south. It is stated in the Anglian Water comments that an adoption agreement is to be entered to either move the assets or building over them, but the development should take them into consideration when designing the site.

From the layout that has been provided, and the information supplied by Anglian Water, this has not been taken into consideration through the design of the layout of the site as no indication has been made in the application that the required easements have been included through the site or if the pipes are going to be relocated. Nor has an adoption agreement been undertaken at the point of writing this report. Therefore it is not clear if the dwellings can be built in this location and not effect the assets owned by Anglian Water. SCLP12.62 recognises the sewers crossing the site and this alignment of these is clearly set out in Enclosure 5 of the Design and Access Statement. With particular regard to the sewer passing east-west across the site, this is currently below the proposed location of plots 19, 21, 24, 25, 28, 29, 31, 35, 38 which accommodate 20 units. The application suggests the sewer will be relocated but provides no detail on where or how. The relocation of such a length of existing sewer is a significant infrastructure burden on a site of this scale and the ability to undertake this work should be demonstrated as part of the application in order to show that the proposed layout can be achieved. Without this certainty the deliverability must be questioned and it does not comply with Policy SCLP12.62 in that respect.

Policy SCLP 9.6 of the Local Plan review refers to the need to have a Sustainable drainage systems for more than 10 dwellings on a site. As there is no objection from the County Council Officers on this matter it is considered that this Policy is conformed with. However, Policy SCLP 9.7 would not

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have been conformed with as there is no detail to show how the water on the site is to be managed.

Habitats Regulations Assessment

The proposal site is located within the 13km zone of influence over the following European Protected sites:

- o Alde-Ore Estuary SPA/Ramsar
- o Sandlings SPA
- o Orfordness-Shingle Street SAC

The development is for 75 new dwellings, therefore it is concluded that there would be likely significant effects on the European Sites through the increase on recreational pressures. Therefore stage 2 "the integrity test" is to be applied to this application.

The East Suffolk Ecology Officer has reviewed the application and the supporting information. The supporting information states that there is an adequate space within the site to be able to provide mitigation within the site as the proposed development, in combination with other development proposals for Rendlesham and the District is considered to have a Likely Significant Effect on European sites in the local area.

It has been concluded by the East Suffolk Ecology Officer that the land that is proposed within the site the layout includes one area of greenspace in the north-eastern part of the site and another, smaller area, on the western side. However, it has not been demonstrated that residents of the development would have access from the development to a 2.7km circular walking route, either within the site or connected to existing rights of way. In the absence of demonstration that such a route is available there remains the potential that nearby designated sites will be used for regular recreational activities (such as dog walking) which may result in significant adverse effects on such sites. This on site mitigation is necessary for developments over 50 dwellings within the Zone of Influence in addition to strategic mitigation in the form of a RAMS contribution.

The information that has been supplied within the application details that a Mitigation amount will be provided to the Local Planning Authority. The HRA report and Planning Statement quote different figures for the RAMS contribution, the (per dwelling) figure within the HRA report would appear to be correct at £321.22 per dwelling. This would be a total of £24,091.50 for the whole development. A heads of terms has been submitted to the Local Planning Authority as part of this application, but it was submitted at a late stage of the application and in draft from that has not been commented on by Local Planning Authority, therefore the contribution that is to be paid cannot be commented on. A S111 form has not been submitted on this matter.

On Site Ecology

Local Plan policy DM27 (Biodiversity and Geodiversity) criterion (c) states that all development proposals should incorporate beneficial biodiversity conservation features where appropriate.

A Preliminary Ecological Appraisal (PEA) report (BasEcology, March 2018) has been submitted as part of this application. There are mitigation recommendations proposed, but no further surveys are recommended.

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Comments have been received from East Suffolk Ecology Officers stating that, within the PEA it refers to ecological receptors that can be found on the site at present and details the necessary mitigation /compensation measures that should be implemented through the proposal and the site. However, these mitigation/ compensation measures are not then identified within the plans and proposals for the site, therefore it is unclear how these will be provided or over what time period.

From the plans provided it is unclear whether the layout of the development includes external lighting. As recognised in the PEA lighting has the potential to result in an adverse impact on bats and therefore if external lighting is required/proposed an ecologically sensitive lighting strategy should be provided.

Trees and Landscaping

The proposal site is visually well contained to the north and west by existing woodland and will have no visual connection with the wider rural landscape, and by existing residential development to the east and south. There are no public rights of way in the locality and so any visual impacts will be confined to the existing dwellings to the south and east. Therefore it is considered that there would be no impact on the wider landscape from this proposal, as confirmed by the East Suffolk Landscape Officer.

In respect of the landscape strategy plan, there is an allocation of open space, and an acceptable degree of separation from the existing woodland, into which woodland fringe planting is indicated. Subject to final planting details, which would be requested by a condition the indicated landscape layout is acceptable.

A tree survey has been submitted which shows that three trees will need to be removed because they obstruct the two access points, as well as various groups of Sycamore trees along the southern site boundary in order to achieve the proposed site layout. It is considered that these removals will not have a significant impact on wider landscape character, although their removal will have a localised affect on the outlook of immediately adjacent properties.

There is proposed to be a play area within the development, this will meet Policy SCLP 8.2 of the Local Plan review, but there are no details of the play area and how this is to be used and the age groups that it is to serve. It is also considered that the provision of open space through the development will not serve the whole of the development as it is not completely walkable by all future users of the site.

The Rendlesham Neighbourhood Plan and SCLP 8.3 of the Local Plan review both refer to the need for allotments, this has not been provided through this application and therefore the proposal is not considered to be compliant.

Archaeology

Comments have been received from the Suffolk Archaeological Officers on the application. It has been identified that the site lies within an area of archaeological potential recorded on the County Historic Environment Record. Multi-period crop marks (RLM 076) and finds scatters (RLM 050) and

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the site of Rendlesham Hall (RLM 019) have been located within the vicinity of the proposed development site.

There is a high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist. This is due to a survey in 2017 and a trenched evaluation in 2018. The results of this work identified an area of archaeological interest as late Iron Age and Roman remains, possibly indicating settlement activity, were found in the Northern part of the site.

It has been stated by the consultee that there would be no grounds to consider refusal of permission, in order to achieve preservation in situ of any important heritage assets. Conditions will need to be applied to the application to ensure that Paragraph 141 in the NPPF is complied with to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

Land Contamination

Appropriate information has been submitted as part of this application to be able to demonstrate that that contamination will not be an issue on the site. It has been confirmed by the Head of Environmental Protection, that there is no objection to the application subject to a condition if the application is going to be recommended for approval.

S106 and CIL

CIL contributions will be provided through this development. Any contributions which are collected will provide 25% to Rendlesham Parish Council as a made Neighbourhood Plan is in place.

A S106 is also going to need to be completed as part of this application or any subsequent appeal to secure the amount and potential phases of payments to the Local Planning Authority and County Council. This was a refusal reason in the previous application, due to the lack of information. A draft document was not included within the submission of the current application to the Local Planning Authority. A draft document was submitted in the final stages of this application. The S106 is not at a stage that can be considered acceptable and therefore the application is still being recommended for refusal on this matter, specifically the inability at this time to secure affordable housing, RAMS contribution, Open Space delivery and management and other matters.

Through the Local Plan review Policy SCLP 3.5 identifies the infrastructure that is to be provided and the requirements for each development and how this is to be funded. As this applicant did not provide a S106 in a timely manner to be able to be considered by the Local Planning Authority, this proposal is not considered to conform to this policy.

Climate change

Policy SCLP 9.2 of the Local Plan review details the measures that are to be met by all new developments of over 10 dwellings. From the information that has been submitted it is considered that the proposal will not meet the details of the Policy and therefore is not in conformity.

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Planning Balance

The application of an NPPF tilted balance is not necessary in this case. However the applicant promotes the proposal on a tilted balance basis and therefore consideration is given to such a balance in the circumstance that it was deemed applicable. Under the circumstance the decision should be made in accordance with Section 38(6) and there are no material reasons to decide otherwise. Due to the very clear and significant harm that has been identified above it is considered that this will not be overcome from the limited benefits to the site from this development.

Summary of Benefits and Adverse Impacts

The benefits of the scheme have been identified as:

- Economic benefits including both spend in the local economy and job creation in the construction industry, during construction and upon occupation,
- Provision of affordable housing (though this is affected by deliverability concerns highlighted in the report),
- Very limited weight to CIL contribution to be spend on infrastructure projects, a proportion of which would be directed to the Town Council (15% of receipts), as this is required primarily to mitigate the effects of the development and New Homes Bonus.

The adverse impacts of the proposals have been identified as:

- The poor design and layout of the development.
- The lack of connectivity to the existing wider community, through limited public routes into and through the development, and limited visual cohesion with the adjacent built environment in terms of layout and form,
- The creation of locations which would be vulnerable to fear of crime, due to lack of natural surveillance,
- The impact on residential amenity, through limited residential amenity spaces for some units and direct overlooking to both proposed and existing dwellings,
- Insufficient information on the provision of affordable housing,
- The impact of odour from the adjacent treatment centre upon the proposed open space and future residents.
- Impacts upon the habitats of protected species and impacts upon environmentally designated sites from increased visitor numbers, resulting in likely significant effects.

The adverse impacts of permitting this development would significantly and demonstrably outweigh the benefits, when assessed against the NPPF taken as a whole.

Conclusion

The concerns that have been raised on the original application and at pre-application stage have not been overcome. These are in regards of the design and function of the layout of the site, how the dwellings and the street layout are to relate to each other to create a cohesive and safe community. The impact on the amenity of the neighbouring properties, in regards of overlooking with the site, the adequate provision of amenity space. The proposal does not meet the

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requirements of the NPPF, Rendlesham Neighbourhood Plan, the policies in the Core Strategy, Site Allocations and Area Specific Policies Document and the Building For Life 12 Guidance.

Another reason for refusal that is to be applied to this application is in regards of odour, because of the location of the Cordon Sanitaire and the Anglian Water Treatment Works to the north east of the site. There does not appear to be adequate provision for these facilities and how the site is going to be impacted upon. Furthermore the ability to deliver the layout and re-route the existing sewer has not been demonstrated, which is a policy requirement.

As there are material planning concerns on the site as stated above there is a principle objection to the site in regards of the proposed housing numbers, the application is above the 50 dwellings as stated in Policy SSP12 and therefore should be reduced to overcome the material planning concerns and make it more in line with the number of dwellings stated in Policy SSP12.

A draft S106 has been submitted for the proposal. However, due to the late submission of this document and the outstanding issues within it, it is not a signed or agreed s106 and is it therefore still to be refused on this basis.

The on-site HRA mitigation is not adequate and there is no sure detail of how the contributions are to be provided. This will therefore result in likely significant effects on European Sites.

Therefore the application is being recommended for refusal due to the overall harm that would be cause from this development, it is considered that there would be no benefit recommending the application for approval on the basis of new dwellings in this sustainable location versus the impact and harm that would be caused on the overall design and function of the site and harm to the amenity of the future residents of this site lack of affordable dwellings, HRA mitigation and no firm detail on the S106. These concerns and refusal reasons have been raised throughout the pre-applications and previous application that has been recommended for refusal. Therefore this application cannot be supported and is being recommended for refusal.

Whilst there have been representations of support from third parties, there have been no representations of support from Rendlesham Parish Council or Statutory Consultees, and therefore the referral process has not been triggered, so the application will be determined at officer level in accordance with the adopted scheme of delegation.

Case Officer: Jane Rodens, Area Planning & Enforcement Officer, (01394) 444505

Authorising Officer: Liz Beighton, Planning Development Manager, (01394) 444778,

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