



## Committee Report

Planning Committee South - 27 June 2021

Application no DC/20/5278/FUL

### Location

Land To The North And West Of  
Garden Square And  
Gardenia Close  
Rendlesham  
Suffolk

**Expiry date** 29 March 2021

**Application type** Full Application

**Applicant** Capital Community Developments Limited

**Parish** Rendlesham

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

**Case Officer** Ben Woolnough – Planning Manager (Development Management)  
01394 444593

[Ben.woolnough@eastsoffolk.gov.uk](mailto:Ben.woolnough@eastsoffolk.gov.uk)

### 1. Summary

- 1.1. This application seeks full planning permission for the development of 75 homes, open spaces and associated infrastructure.
- 1.2. The site is allocated in the East Suffolk Council Suffolk Coastal Local Plan for the development of approximately 50 dwellings under Policy SCLP12.61.

#### The Case for Development

- 1.3. The site is allocated for the development of approximately 50 dwellings by Policy SCLP12.61 of the East Suffolk Council Suffolk Coastal Local Plan (adopted September 2020) – [Local Plan - East Suffolk Council - Suffolk Coastal Local Plan \(Adopted September 2020\) - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#)
- 1.4. The principle of residential development on the site is therefore established and the application will deliver 75 homes including 25 affordable dwellings which is a significant

benefit of the proposal. However, the proposal is for notably more than the approximate 50 dwellings referred to in the policy.

- 1.5. The Local Plan allocation forms part of the Council's strategy for growth which seeks to include appropriate growth in rural areas that will help to support and sustain existing communities.
- 1.6. Planning Permission has previously been refused twice on this site for a proposal from the same applicant for same number of homes, first in 2018 (DC/18/2374/FUL) and then in 2019 (DC/19/1499/FUL). The latter was subject to an appeal which was dismissed in 2020 following a public inquiry. This proposal reflects on the outcome of that appeal, which was primarily focussed on the design of the development and has sought to address the design failure of the previous scheme.
- 1.7. Since the previous refusal the site has once again been allocated within the development plan. This follows its previous allocation in the 2017 Site Allocations and Area Specific Policies Development Plan Document and prior to that within Suffolk Coastal Local Plan (incorporating 1st and 2nd Alterations) 2001 and 2006. The site has therefore been allocated for housing for over 20 years and is the longest standing allocation in the current Local Plan.
- 1.8. The design of the development now proposed is considered to be acceptable and in accordance with Policy SCLP12.61 and the Rendlesham Neighbourhood Plan. In addition to the affordable dwellings the proposal will deliver a mix of house types, sizes and designs as well open space and landscaping providing a high-quality environment.
- 1.9. There will be economic benefits in the short to medium term through the creation of jobs in the construction industry and in the longer-term benefits to the services and facilities in the village and wider area through increase visitor spend in the local economy. The development as provides a significant benefit through the provision of an expansion and wider connection of the local Public Right of Way network, in a village which has extremely limited public access connections into the countryside.
- 1.10. The principle of residential development on the site is accepted and the proposal is in accordance with the Local Plan. The proposed method of surface water drainage attenuation for the site will adequately mitigate any flood risk, however it is not an entirely SuDs method of mitigation and this is the only design shortfall in the scheme. In this instance this does not outweigh the wider policy compliance or benefits of the scheme and there are design reasons for its acceptance.

#### Reason for Committee

- 1.11. This application is referred to the Planning Committee by the Head of Planning and Coastal Management under the terms of the Scheme of Delegation due to the level of public interest and its planning history. It is also being presented alongside the Outline Planning application for a further 75 homes in the village DC/20/3890/OUT allocated under policy SCLP12.62, therefore allowing a collective consideration of all allocated growth in the village at one Planning Committee meeting.

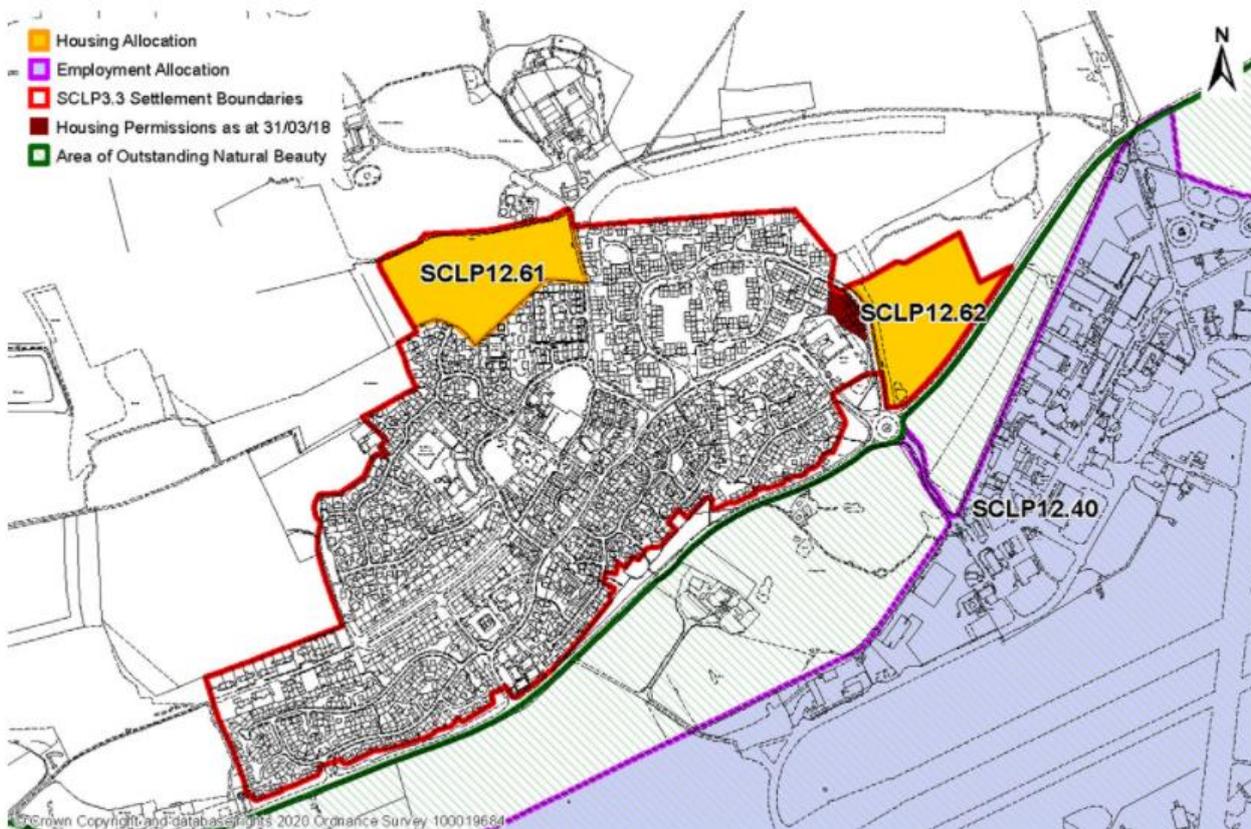
## Recommendation

- 1.12. Officers are seeking authority to approve the application with conditions, subject to the completion of a Section 106 legal agreement to secure the necessary obligations.

## **2. Site description**

- 2.1. 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.
- 2.2. The proposal site is 5.19 hectares and located within the Rendlesham Settlement Boundary of the Suffolk Coastal Local Plan and Rendlesham Neighbourhood Plan (January 2015). The site has been allocated for housing since 2001 then under the former Policy SSP12 (Land West Of Garden Square) of the East Suffolk - Suffolk Coastal District - Site Allocations and Area Specific Policies DPD January 2017. It is now an up to date allocation under the Suffolk Coastal Local Plan (2020) as SCLP12.61 and is shown below alongside the other housing allocation for the village (SCLP12.62).

### **Land West of Garden Square Rendlesham and Land East of Redwald Road, Rendlesham**



### **3. Proposal**

- 3.1. 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.
- 3.2. The first proposed access to the site is from both Tidy Road (southern edge), which crosses a small area of land that is not owned by the applicant, but it is within the applicant's red line site area and 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 and is owned by the applicant. There is proposed to be one main primary road through the site (east to west) connecting Garden Square to Tidy Road. A loop road would extend off the primary road in the form of a shared surface drive which would not be adopted by the Highway Authority and would be designed as a shared surface, therefore combining pedestrian, cycling and vehicular use into a single surface treatment, encouraging low traffic speeds and pedestrian priority. A number of shared surface cul-de-sac are also included in the layout.
- 3.3. There are four proposed pedestrian accesses to the site. Two are via the vehicular access points with adoptable pedestrian pavement provision. One is proposed is to the north of the current Maharishi Peace Palace into the southern boundary of the site and would involve private land between the existing and new communities though owned by the applicant. The fourth is a proposed new Public Right of Way connection in the north east corner of the site.
- 3.4. The 75 dwellings contain a mixture of bungalows, semi detached, detached, flatted and maisonette properties. With the exception of the small number of bungalows, they are all proposed to be two storey in height or two and a half storey with the second storey purely in the roof space. These are all proposed to front onto routes through the site with a central square open space forming a key focal point.
- 3.5. 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 the north east corner of the site. Also proposed within this open space area is a play area and pumping station. A central green route will also connect the site to the main open space, via the central square and is provided as a design feature due to the current sewer which runs underneath it and constrains development around it.

### **4. Consultations/comments**

- 4.1. A total of 108 third party representations were received throughout the consultation periods - 44 raised objection and 63 support the scheme.
- 4.2. Matters of objection are summarised below:
  - Highway impacts: Congestion; additional traffic through Campsea Ashe, Eyke and Melton (particularly at the railway crossing); cumulative impact associated with

Sizewell and Friston traffic; access roads are inadequate widths for construction traffic; and highway safety concerns (particularly with cyclists and children).

- Flood risk/surface water drainage: SuDs and swales will fail to prevent impact to neighbouring properties; and concerns associated with the holding objection raised by the Lead Local Flood Authority.
- Environmental impacts: Air pollution associated with increased traffic; air/noise pollution associated with construction (exacerbated by the proposed timeframe).
- Overdevelopment: Housing provision will exceed the number allocated within Rendlesham Neighbourhood Plan.
- Impact on residential amenity: Loss of privacy, loss of outlook, loss of light and loss of view.
- Impact on biodiversity/wildlife.
- Closed/separate development contrary to the Neighbourhood plan.
- Lack of infrastructure to support the development (limited school and healthcare capacity).
- Play area inappropriately located next to treatment works/basin.
- Design of properties fails to meet required standards (as noted within the Disability Forum's response).
- Insufficient affordable housing provision in terms of house type.
- Absent of allotments (long requested by the community).
- Concern regarding the financial viability of the project.
- Slow rate of delivery
- That the housing is targeted to be sold to a specific market of customers.

#### 4.3. Matters of support are summarised below:

- Aesthetically pleasing architectural design.
- Low density development with well-spaced dwellings that relate well to neighbouring properties.
- Provision of affordable housing.
- Provision of public open space a benefit/landscaping asset.
- Enhancement of local quality of life.
- Subsequent CIL funding will provide opportunity to invest in future facilities.
- Environmentally friendly and sustainable community.

## 5. Consultees

All comments received are collated within one table – with the respective ‘date consulted’ and ‘date reply received’ listed.

### Parish/Town Council

Consultee	Date consulted	Date reply received
Rendlesham Parish Council	14 January 2021 16 April 2021	3 February 2021 20 May 2021
“Rendlesham Parish Council (RPC) Planning Committee have met to discuss the above application on the <b>25th January 2021</b> , which was also attending by the applicant. The decision		

of the RPC Planning Committee was ratified via a full RPC meeting on the 1st February 2021. Whilst we acknowledge that there has been much improvement to this application since the previous application (C/19/1499/FUL), we are disappointed that the applicant has chosen not to engage with RPC at the pre application stage and hope going forward this can be remedied. Based on the detailed application as submitted RPC **object** to the application on the following grounds.

1. The application for 75 dwellings is not in accordance with East Suffolk Local Plan (Suffolk Coastal Local Plan), which has identified the site SSP12 (SCLP12.61) as suitable for “approximately 50 dwellings”. Section 12.427 makes clear that Rendlesham has capacity to accommodate more than the 100 homes proposed, but is limited predominantly by highway factors and the cumulative impact of both residential and employment traffic on the local highway network, and also by education capacity. As it stands, including the outline planning application for 75 homes on the allocated site SCLP12.62 (DC20/3890/OUT) and the planning application for 11 homes on the commonly referred to ‘sport centre site’ (DC/20/1035), the cumulative impact to Rendlesham is 166 proposed new homes.

2. The detailed application includes no evidence of how the provision for ‘Affordable Housing’ will be delivered within the proposed development under object 3 of the Rendlesham Neighbourhood Plan nor SCLP5.10 (previously DM1). We note that the applicant has set up its own housing association (Community Capital Homes Limited) contrary to the expectation of the Development Control Team and the Housing Strategy and Enabling Manager of East Suffolk Council. The application also lacks the detail of whether the affordable homes will be divided between rented and shared equity.

3. The application is not compliant with the detail and aims of RNPP3 of the Rendlesham Neighbourhood Plan (RNP) in respect of allotments. RNPP3 clearly states that ‘New residential or mixed use development is required to make provision towards meeting identified local need for allotments, orchards and growing spaces. The applicant has inferred that, as allotments have been provided on SSP13, there is no further requirement. This is incorrect as evidenced in the attached Rendlesham Allotment Strategy. The allotments proposed for SSP13 SCLP12.62 are equal to 5 standard allotments, the identified need is a minimum of 45. RNPP3 para 11.03 clarifies that allotments can be provided in several locations to meet the identified need. The Parish Council emphasises that at the point of sending this letter a waiting list of 87 residents exists for allotment plots.

4. There has been no Financial Viability evidence provided with the application to allow assessment in line with Appendix G of the East Suffolk Local Plan.

5. Apparent “Closed Community’ approach to marketing has challenged the availability of any (including the ‘Affordable’) properties to be available to fulfil the local housing need for those within Rendlesham or with ties to Rendlesham. During the meeting of the 25<sup>th</sup> January 2021 the applicants verbally advised RPC that marketing was not taking place and properties will be available in the future to the general public. Attached per appendix 2 to this letter is the more recent marketing material being circulated to targeted people by the applicant which is contrary to that statement.

The appended publication is located [HERE](#)

Should this application be approved RPC ask that the scheme is protected by a Section 106

agreement to ensure lettings and discount market ownership will be restricted initially to people with a strong connection to the parish. The Section 106 will also include the names of the abutting parishes to be included in the “cascade of eligible parishes” if there is no one left in need in the core parish. Each Local Authority will have its own definition of local need and local connection, but typically it would cover the following circumstances:

- Connection to the village by birth
- Current residence within the village for a number of years
- Former resident in the village within a set timescale
- Close family members resident in the village
- Employment in the village

6. RPC note the holding objection issued on the 27th January 2021 from Matt Williams, the SCC Flood and Water engineer, and agree that a further Flood Risk Assessment should be completed ahead of any consideration of the application.

It is not acceptable to RPC that in the event of extreme rainfall the current proposal will result in flooding to Tidy road and we look to the developer and the appropriate authorities to finalise a suitable surface water drainage scheme.

In light of the objection from SCC about the key proposals of the surface drainage system, RPC look to East Suffolk Council to refuse this application until this fundamental aspect of the design is agreed. Please refer to appendix 1 for pictures taken on the 29th January 2021 to reflect the current flooding issues on the boundary between the site and Tidy road.

### **Other Considerations**

1. Adoption of all roads, including service roads, on the development by SCC to ensure a satisfactory standard of highway construction. RPC strongly support the adoption of the roads to ensure proper maintenance is undertaken which will also allow waste refuse collection, and emergency vehicle access to all properties on the proposed development. It also gives security/certainty to owner/occupiers about where responsibilities lie.

It is noted that Garden Square is not adopted and currently in a poor state of repair. During the meeting on the 25th January 2021 the applicant confirmed to RPC that the road was currently up to an adoptable standard and simply required the final surface. This statement is contrary to the Suffolk County Councils (SCC) Highways report which was included within the previous appeal [Here](#) and went on to state that the current road is not completed and would not be adoptable by SCC without considerable work commenting as follows:

- The base course has been exposed since 2005 and will now have oxidised, this
- surfacing will not be acceptable and would need to be removed.
- The footways have not been surfaced and have raised covers and other trip
- hazards.
- The street lighting would need to be assessed and brought up to current
- standards
- The kerbs have not been inspected and we do not know if they are installed
- correctly, and the correct levels for the final finished surface.
- Therefore, we have to assume that all of the existing construction will need to be
- removed and replaced to current SCC standards, prior to adoption.

RPC would like to see this road adopted before the development commences. To ensure enforcement of this RPC request that in the event of any approval a suitably worded Planning Condition is issued to the applicant.

We point out to East Suffolk Council that this was a very contentious issue on a previous development (by a separate developer some years ago) and we wish to avoid any such repeat.

RPC further note that the advice given in Pre Application (e-mail Ben Woolnough to CCD 07 December 2020 13:09) is in our view not strong enough on this point. That correspondence simply says "It may be necessary to make the initial entrances of both ends of the loop road adoptable standard of the same form as the main road ". The use of the word "may" suggests that there is some option. RPC do not see this as optional and ask East Suffolk Council to make the requirement clear and mandatory.

2. It is noted that areas of land are deemed to be intended for the use of the general public as part of the proposal. It is and has consistently been the view of RPC that the ownership of such land should be legally transferred to RPC ahead of development in order for its use as part of RNPP3 to be managed and maintained by RPC. The current intent of the developer seems to be the establishment of "his own" estate management company.

3. Disability access as per the comments raised by the Suffolk Coastal Disability Forum on the 21st January 2021 should be taken on board and incorporated into the overall design to ensure any development is accessible by all.

4. The traffic survey is restricted to home ownership for those practicing TM and therefore given the development should be accessible for the wider public to purchase a survey to reflect ownership on this basis should be provided as part of the application given the importance of the cumulative impact of the wider peninsula. It is noted that the development allocates parking for over 170 vehicles which will make significant impact on local traffic which should be considered in the new assessment.

5. A condition to any approval should include a provision for ground or air source heat pumps in line with Ministry of Housing, Communities and Local Governments published commitment to achieve a 31% reduction in carbon emissions, and the intended government legislation to outlaw new Gas Boiler installation in the near future which lies within the predicted timeline of the completion of the housing allocation on this site in East Suffolk Local Plan. RPC record and ask East Suffolk Council note that similar reasoning has been used recently in Ipswich (See EADT [here](#)) to reject a development proposal.

6. Whilst the applicant has alluded to 33% of the residents owning electric cars we do not believe it in the gift of the applicant to impose conditions on the ultimate owners. That said, the applicant has not included any charging points within the detailed planning application that RPC can see and we ask that a provision is made for these for every home (including shared points for flats).

7. To close the Tidy Road entrance with a barrier and used only as an emergency exit during the construction period.

8. All construction traffic to be parked on site and construction access is in accordance with an agreed site access plan and incorporated in a Construction Management Plan i.e. that all

construction traffic is routed through Garden Square entrance/exit.

9. Contributions in respect of school and GP facilities and that CIL contributions are sufficient to mitigate the impact of the increase in population as a direct result of this development.

10. Habitats & Wildlife are not compromised as a result of the proposed development.

11. It is also noteworthy that the East Suffolk Local Plan expects this development to take 6 years to build 50 houses (see Local Plan page 514 – Appendix D). The plan actually shows first houses completed in 2023/24 (2½ years from now) with the expected delivery in the years as follows :-

FY 2023/24	FY 2024/25	FY 2025/26	FY 2026/27	FY 2027/28	FY 2028/29
5	10	10	10	10	5

This suggests that the development of 50 houses would take until late 2028 to complete. This programme effectively means vehicular disruption (if the actual number is 75) until the end of the decade. RPC feel this protracted duration justifies an objection on the grounds of “environmental impact” and quality of life for the existing residents. We welcome the applicant confirming during the course of the meetings on 25th January 2021 and 1st February 2021 that they will engage with RPC in the future with regards to proposed/potential developments.”

"I have Just noticed another 2 docs have recently been added to this Application on ES Website. These are presumed to be new drawings from the Applicant ....(Doc refs 38878-1 and 38878-4 entitled Walking Route Plans) The seems to be yet another addition after the closing date for comments . This emphasises and justifies the Parish Council reference, in our recent Objection to the proposal, to "piecemeal approach of the Appllcant" to the process. Rendlesham Parish Council now have two fundamental questions

1 Is this late submission acceptable in the Planning Process and if so when (if ever) does the option to submit new material stop ??

2 Should this additional submission trigger another "Consultation Period" for RPC and all other statutory reviewers assess this new information ??

The new drawings issued seem to be totally new and an attempt to link this application with wider walking routes around Rendlesham, but are submitted without any apparent explanation of their context.

If this additional late this information is deemed acceptable please advise this Council how long we have to assess/comment and what credence (if any) this late submission will have in the Case Officer's assessment of the Application."

## **2<sup>nd</sup> Consultation**

Rendlesham Parish Council (RPC) Planning Committee have met to discuss the proposed amendments to the application raised by the application on the 24th March 2021.

As a starting point we must express our disappointment that this application has had to be revisited in this way as such piecemeal amendments simply cause frustrations for all parties

concerned.

In respect of the amendments themselves we are also disappointed that despite previous assurances made by the applicant on both the 25th January 2021 (where the application was discussed at the Parish Council planning meeting) and the 1st February 2021 (where the objection was ratified at a full council meeting) no attempt has been made to engage with RPC nor has any effort been made to address the underlying basis for our objections highlighted in our letter of the 3rd February 2021.

We have however received an email from the applicant dated the 20th April 2021 (see appendix A) which we read as a 'fait accompli' as opposed to any attempt to engage.

For the avoidance of doubt RPC continue to object to this application for the reasons set out in our letter dated the 3rd February 2021.

RPC also make the following comments in relation to amendments proposed by the applicant:

In respect of the Flood Risk Assessment and Drainage Strategy RPC note the Holding Objection from SCC which whilst addressing that key technical issue also indicates that "a full above ground SuDS solution is achievable, in accordance with local policy (SCLP9.6). (but) would have an impact on the quantum of development." RPC read this to mean "to have a fully compliant SUDS system the site cannot accommodate 75 houses but maybe could accommodate 'approximately 50'." (As per ESC Local Plan).

We strongly urge the East Suffolk Planning team to ensure only an agreed and policy complaint solution to the surface water flooding issues faced on the site is approved going forward. We understand this is not currently the intention of the applicant who favours a non-complaint option which poses unacceptable flooding risks to both the existing residents of Tidy Road and future residents of the development.

RPC do not accept the proposals for the "Estate Management Company" based on past experience of such arrangements in Rendlesham and seek a formal transfer of any land for public use to direct ownership of the Parish ASAP within any development.

Further in respect of the Land for "Public use" RPC particularly object to the content of the proposed Landscape Management & Maintenance Plan which includes

- o reference to both a Private Management Company to be appointed by the Developer and
- o The Landscape Management Contractor being a company who may be appointed by the above.

This arrangement leaves the management exclusively in the hands of developer and offers no option to manage space for the community by RPC

RPC further note that the Landscape Management & Maintenance Plan itself includes the following statement:-

Prior to the commencement of development (or such other date or stage in development as may be agreed in writing with the LPA) a detailed long term Landscape Management and Maintenance Plan for all landscape areas shall be submitted to and approved by the LPA in writing.

Has such a document been prepared and issued as the developer is advocating its need "prior to commencement of the development" ?

RPC maintain our previous views on both the Marketing Strategy and the lack of a defined registered provider of Social housing, as this latest submission provides no tangible evidence of any change. RPC also note the views of the East Suffolk Housing Strategy Team in their response to the Application which also questions the proposed provider of social Housing as follows "The Council works closely with several Housing Associations and it is expected that one of them would own and manage the homes. A list can be found here on the Council's website.

We note that the Addendum to the Noise Report shows in Fig 5 a "Proposed Acoustic Barrier". We note the above is not shown in the revised "Accommodation Plan" (Ref 0300 K). This in itself is a clear omission from the drawing that to most people is the "layout of the scheme" and pre-empts the question about details the "Proposed Acoustic Barrier". RPC require these details to be made clear.

RPC note the play area has been relocated closer to the water treatment works and given previously raised queries around its proximity to the treatment works question the health and safety aspect of this amendment.

RPC has explained to the applicant in the meeting of the 1st February 2021 its expectation that the application complies with the detail and aims of RNPP3 of the Rendlesham Neighbourhood Plan (RNP) in respect of allotments of which a waiting list exists of 87 residents. The applicant is correct that the applicant on SSP13 has mooted an allocation for allotments and whilst we reiterate this is not agreed the suggestion in any case is only for 5 standard allotments. The identified minimum need for Rendlesham is as previously stated for a minimum of 45 Standard Allotments (Rendlesham Allotment Strategy, 2021).

We are concerned that the applicant continues to refuse to offer allotments in order to comply with RNPP3 and supporting Rendlesham Allotment Strategy. The reliance on potential future unapproved developments is a clear indication of ignoring the evidenced need of the village residents and of compliance with RNPP3.

In the original application RPC understood the plans to include an orchard giving both physical access and the feeling that one was 'allowed' access. The recent amendments mean the path is alongside the unspecified trees with only a small number of trees being within touching distance. To RPC this highlights that the applicant still refuses to accept the repeatedly proven fact that residents of Rendlesham want the physical experience of growing and harvesting. Plucking an apple from a tree might not be close to having an Allotment but it's better than only being able to see the apple in the distance.

Given the ongoing difficulties with regards to disability access within a number of the dwellings as highlighted by the Suffolk Coastal Disability forum we would refer the applicant to the Building Regulations 2010 (Approved Document M) and specifically M4(2) Category 2: Accessible and adaptable dwellings and M4(3) Category 3:

Wheelchair user dwellings (see appendix B) and ask East Suffolk to ensure in the event the application is approved that conditional application of these regulations is included.

We feel we should also respond more formally to some of the points raised in the 'Fait Accompli' provided to RPC by the applicant on the 20th April 2021 (appendix A) as follows:

1. Number of Dwellings

a. RPC maintain as per our objection letter dated 3rd February 2021 that an application for 75 houses is not approximately 50 as per the local plan and any approval at this level along with a similar number on SSP13 would be unsustainable.

b. RPC also note the holding objection from Suffolk County Council which includes from the Flood Risk Assessment that there is no ability to provide a fully compliant SUDS system for 75 Properties on this site

2. Affordable Housing

a. The statement confirms that

i. The affordable housing will be managed by a registered provider of social housing. Currently there are 1,632 registered providers in England.

ii. CCD has set up a company, Capital Community Homes Ltd (CCH), which has applied to become a registered provider."

iii. RPC note that CCD are effectively looking to be registered as the 1633rd provider. We are unclear as to the intention of CCD to become a registered provider as this is not being shared but note the opinions expressed within East Suffolk Housing's response to the application and their requirement that a "Provider" from their approved list be engaged

b. RPC also note the more recent letter from East Suffolk with regards to the actual housing need within Suffolk which is not restricted to flats but rather the actual need which is:

i. 2 bed 4 person house – 14 applicants

ii. 3 bed 5 person house – 14 applicants

c. We expect the applicant to review their allocation in line with this actual housing need although record (as per CCD recently filed accounts) deposits for properties have already been taken amounting to £964,690 which leaves uncertainty as to what properties have not already been reserved

### 3. RNPP3 - Allotments, orchards and growing spaces

a. As mentioned earlier in this letter the application has not remained the same in this aspect and the previously offered (inadequate) 'orchard' is no longer identified in the new landscape details.

### 4. Viability assessment

a. RPC make no further comment on this as a requirement but still maintain that the development and its business model (of seeking money up front from prospective owners) is unviable and would result in an overly protracted Construction Programme.

### 5. Approach to marketing

a. RPC have previously shared copies of CCD's own marketing material with the applicant and remain unclear why this point is continued to be denied. We also refer to the recently filed accounts which evidences further the taking of deposits.

b. RPC maintain as per our previous objection that the marketing is being controlled and targeted to a specific group.

c. RPC also remain unconvinced that a conventional estate agent would engage in marketing a "Pay now build later" property development given the limited market of people who would be in a position to purchase a property on this basis.

### 6. Surface water drainage

a. RPC do not dispute CCD's view that the existing Flooding issues in Tidy Road are not "created by this development" The issues will potentially be exacerbated by the development. (as indicated in the previous Flood Risk Assessment which conveniently showed water flow direction away from Tidy road when the reality was different.)

b. RPC expect any development to ensure that the existing situation is made no worse and as the current floods stem from the site of this proposed development any development should be undertaken so as to prevent such flooding being repeated.

### 7. Other considerations

#### a. Adoption of roads

i. RPC refute that Garden Square is up to an adoptable standard which was supported by a statement by Suffolk County Councils (SCC) Highways report included in the last application.

ii. RPC's view remains that the roads must be brought up to an adoptable standard before any development begins and ask that the East Suffolk planning team to ensure a condition to this effect is included should the development be approved.

#### b. Adoption of open space

i. CCD continue to cite space being "made available to the entire Rendlesham village in perpetuity, and that it will be maintained and managed by an estate management company", comprising local residents.

ii. RPC maintain that ownership of the land should be provided to RPC for the following reasons

iii. The land will not come into existence until completion of the development and there are new residents to be part of the management group.

iv. Experience with Land Management companies in Rendlesham is full of issues both over the costs to residents and the lack of "management" actually undertaken. It is in fact a proven unsuccessful model here in Rendlesham.

#### c. Disability access

i. RPC note and support the Suffolk Coastal Disability forum recent objection of the 22nd April 2021 in that disability access is severely lacking on this application.

#### d. Programme of construction

i. RPC feel the construction of three phases over three years is a laudable aim but sadly experience

often Construction of Garden Square and Gardenia Close does not give confidence that this is achievable with the Business model proposed.

Consultee	Date consulted	Date reply received
Tunstall Parish Council	12 January 2021 16 April 2021	No response No response
No response received.		

Consultee	Date consulted	Date reply received
Melton Parish Council	12 January 2021 16 April 2021	28 January 2021 26 April 2021

*"Melton Parish Council Planning and Transport Committee considered this application at its meeting on **27 January 2021**. Whilst the Council accepts the principle of development on this site in accordance with Policy SCLP12.61 in the Local Plan and the Rendlesham Neighbourhood Plan, Councillors nevertheless have concerns as to why, when the Local Plan recommends a limit of c50 units on the site because of the proximity of a sewage treatment plant and sewers crossing the site, the application seeks permission for 75 dwellings. Additionally, whilst the AQA submitted seeks to demonstrate (pages 8-11) that the additional road traffic impacts at Melton generated by this development are "judged to be insignificant", Councillors are nevertheless concerned by the steady year on year growth in permissions for development which impact on the volume of traffic at the Melton crossroads, which is considered by Highways to be operating at saturation point, and there is no longer term strategy in place to divert through traffic from the centre of Melton."*

*"Melton Parish Council Planning and Transport Committee considered this application at its meeting on **22 April 2021**. Whilst the principle of development on this site is established in accordance with Policy SCLP12.61 in the Local Plan and under the Rendlesham Neighbourhood Plan, Councillors see no need to depart from their position advised on 28 January 2021 in respect of the previous application. In making a recommendation for rejection, Melton Councillors expressed concern at the proposed number of units (75) compared with the recommended number in the Local Plan (50) together with concerns at the cumulative impact of the additional traffic likely to be generated on the Melton crossroads. In respect of the revised application, there is a holding objection on grounds of flooding from Suffolk CC, which could be mitigated by constructing fewer units. In the circumstances Melton Parish Council continues its objection to this application as now submitted and recommends refusal."*

Consultee	Date consulted	Date reply received
Eyke Parish Council	12 January 2021 16 April 2021	26 April 2021 27 April 2021

Eyke Parish Council objected to the previous application on the basis of an unacceptable projected increase in traffic movements through the village. The number of properties remains the same as in the previous application, and it is projected that each property could generate between 7 and 8 vehicle movements a day, allowing for service and delivery vehicles. Most of this traffic would

travel through Eyke Street, already overburdened with traffic, and where road safety is a major concern, due to road width, lack of pavements in places and continuing problems with speeding vehicles.

The Parish Council very strongly objects to the current application.

April response

"Eyke Parish Council has consistently opposed this application on the grounds that an additional 75 houses will further exacerbate the existing traffic problems in Eyke. There is nothing in the latest additional information to suggest that this problem has been addressed in any way. The Parish Council's stance remains unchanged."

Consultee	Date consulted	Date reply received
Campsea Ashe Parish Council	12 January 2021 16 April 2021	27 January 2021 10 May 2021

*"Further to above planning application we would like to strongly object to granting permission for the following reasons;*

*1 Its is our opinion that by allowing yet another batch of 75 dwellings will have further negative impact on our already stretched road infrastructure. Especially on the B1078 and Ivy Lodge Road (ILR). These roads are barely coping safely at current levels, with incidents of grid lock events already happening on ILR at regular intervals, as more vehicles are using those roads to reach the A12, because of avoiding the busy Melton cross roads. The B1078, which has become a popular shortcut to the A12 from Rendlesham, has several pinch points where it is difficult for even cars to pass safely each other. The resulting increase of traffic on that road will most certainly increase incidents and impact safety.*

*2 We are gravely concerned by the apparent failure of ESC to take into account the cumulative impacts of all the developments currently being contemplated.*

*3 We strongly object for the development of 75 units, when the original local plan allowed for 50 units. Whilst we do feel that a saturation point has been reached, we recognise that 50 units developments are legally possible.*

*4 We would like to refer to DC20/3890/OUT, which appears to operate under similar circumstances and which reinforces our cumulative impact statement. Those developments, if granted to its full extend, would add approximately 600 journeys a day to the area.*

*5 We are concerned about the lack of infrastructure with regards to local services for such an amount of homes, which will inevitable lead to more car journeys being undertaken."*

*"Campsea Ashe Parish Council continues to strongly object to the development of 75 new homes. As outlined in our original objections, CA PC is highly concerned about cumulative traffic impacts in the area. This development will add ca 450 vehicle movements a day to our area, especially affecting Campsea Ashe, with certain areas of the B1078 and Ivy Lodge Road not capable of safely supporting further increases of traffic volumes, especially at peak times.*

*CA PC is surprised that the well known traffic volume issues are not being considered appropriately*

*by ESC and by allowing developments to exceed LP and Neighbourhood Plan agreed limits. CA PC is concerned about the effect this and the other larger developments will have on the Rendlesham infrastructure with regards to educational and medical services."*

Consultee	Date consulted	Date reply received
Bromeswell Parish Council	12 January 2021 16 April 2021	2 February 2021 4 May 2021

*"Bromeswell Parish Council considers there has been no substantial change in this application to that previously submitted and refused by East Suffolk Council. This application continues to seek a much higher density of units than originally foreseen for this site and fails to address the infrastructure issues identified in the Rendlesham Neighbourhood Plan. The PC also has concerns about cumulative traffic issues given the exceeding of traffic limits on the neighbouring Bentwaters Business Park at certain times of the year. Bromeswell PC therefore recommends REFUSAL of this application."*

**May response**

*"Bromeswell Parish Council wishes to object to this application as it is not within the policies set out in the East Suffolk Council Local Plan nor the Rendlesham Neighbourhood Plan. The PC is also concerned about the cumulative increases in traffic from developments across the peninsula, much of which travels through our village, that at times is causing considerable congestion and delays at the traffic lights in Melton."*

Consultee	Date consulted	Date reply received
Ufford Parish Council	12 January 2021 16 April 2021	8 February 2021 29 April 2021

*"Ufford Parish Council object to this application on the grounds of the unacceptable impact this would have on the Highway. The Local Plan refers to the Melton Crossroads in 12.377 saying "Significant further development in the area around the Deben peninsula, which is primarily accessed via Melton, is constrained due to issues related to capacity at the crossroads in Melton." Although development in Rendlesham is not on the Deben Peninsula, the additional traffic created by the residents of the 75 dwellings trying to get to work in Woodbridge, Ipswich or beyond, between 8.00am and 9.30am will further increase the congestion at the Bromeswell roundabout, the Melton level crossing and the Melton Crossroads. The greatest relevance to Ufford is that after experiencing the long queues through Melton, the new residents will look at a map and will soon learn that they can use Ufford as a 'cut through' to the A12; resulting in our very narrow country lanes, often single track with passing places, being further abused and eroded. This application also comes just days after applications DC/20/3361/FUL and DC/20/3264/FUL were permitted by ESC, allowing a further 130 houses to be built just north of Ufford and further increasing the traffic through the village wishing to access the A12 and Woodbridge. We would refer the LPA to the NPPF, Article 109: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"."*

**April response**

*"No further comments will be submitted from Ufford PC."*

## Statutory consultees

Consultee	Date consulted	Date reply received
Anglian Water	12 January 2021 16 April 2021	3 February 2021 No response

Summary of comments:

No objection - a number of informative notes are provided.

In respect of the Cordon Sanitaire:

“we can accept that the amenity of the development as currently proposed, is unlikely to be impaired by the emissions of odour or noise that would be anticipated from the normal operation of the Rendlesham WRC”.

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	12 January 2021 16 April 2021	No response No response

Summary of comments:

No response received.

Consultee	Date consulted	Date reply received
Network Rail Property (Eastern Region - Anglia)	12 January 2021 16 April 2021	15 January 2020 22 April 2021

Summary of comments:

No objection.

Consultee	Date consulted	Date reply received
SCC Highways Department	12 January 2021 16 April 2021	26 January 2021 26 April 2021

Summary of comments:

Further to the submission of amended drawings, the County Council as Highway Authority make the following comments:

1. It is noted that the layout and access arrangements of the main loop road have been improved and subject to the following amendments (issues are all introduced on new drawing), it is envisaged that the loop road would be suitable for adoption by the Highway Authority: a) Remove sections of footway with right angled turns (where the footway offsets to bypass the swales). Any changes in direction should have a radius or suitable angle. b) Remove or relocate the two western end visitor layby spaces from the laybys north of plot 47-48 as these are currently too close to an access.
2. It is noted that the applicant has provided information regarding the strip of land where the site adjoins Tidy Road. As an essential link, the condition relating to the access/footway connections is still recommended overleaf.

3. Plans relating to parking noted and the recommended planning conditions overleaf have been updated to reflect this and any other amendments.

4. No further comments have been received from other SCC stakeholders (Rights of Way, Passenger Transport, Travel Plans), so unless a further separate response is provided, any comments from my previous response dated 26/01/2021 and previous separate responses remain applicable.

We would recommend that a slightly revised layout plan is provided illustrating an adoptable main access road through the development.

**The following planning conditions are recommended:**

Condition: No part of the development shall be commenced until details of improvements to the road and footway known as Garden Square, Rendlesham have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be laid out and constructed in its entirety and Section 38 Agreement entered into with the Highway Authority prior to occupation.

Reason: To ensure that the necessary improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time.

Condition: No dwelling shall be occupied until continuous road and footway access onto Tidy Road, Rendlesham has been completed in its entirety in accordance with details previously submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that adequate access to the highway is provided and designed and constructed to an appropriate specification and made available for use at an appropriate time.

Condition: Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

Condition: The use shall not commence until the area(s) within the site shown on drawing no. 216-20 0300 Rev K for the purposes of [LOADING, UNLOADING,] manoeuvring and parking of vehicles has been provided and thereafter that area(s) shall be retained and used for no other purposes.

Reason: To ensure that sufficient space for the on site parking of vehicles is provided and maintained in order to ensure the provision of adequate on-site space for the parking and manoeuvring of vehicles where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.

Condition: Before the development is commenced details of the areas to be provided for secure cycle storage and electric vehicle charging infrastructure shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose. Reason: To ensure the provision and long term maintenance of adequate cycle and low emission vehicle infrastructure.

Condition: All HGV traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the planning authority for approval a minimum of 28 days before any deliveries of materials commence. No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan. The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period

of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

Condition: No part of the development shall be commenced until details of a 3m wide bridleway within the development site to link from the north end of Garden Square to the end of the proposed new off-site bridleway have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be laid out and constructed in their entirety prior to occupation.

Reason: To ensure that the necessary improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time.

Consultee	Date consulted	Date reply received
SCC Flooding Authority	12 January 2021 16 April 2021	27 January 2021 20 April 2021

Final Response:

There are a few minor design tweaks I'd still like to see and supporting details such as sections through swales and basins, but this detail can be conditioned. As such, please see below recommended conditions.

1. No development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority (LPA).

*Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained*

2. No development shall commence until details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the LPA. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

*Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.*

3. Within 28 days of practical completion of the last dwelling or unit, surface water drainage verification report shall be submitted to the Local Planning Authority, detailing and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks, in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

*Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as*

*required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk*

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

4. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the LPA. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include:  
Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-
- i. Temporary drainage systems
  - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
  - iii. Measures for managing any on or offsite flood risk associated with construction

*Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater*

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

Initial response:

The submitted documents have been reviewed and we recommend a holding objection at this time. A holding objection is necessary because two options have been presented in Appendix L of the Flood Risk Assessment. Option 1 seeks to maximise the use of above ground SuDS within the existing layout but relies upon below ground storage elements. Option 2 assess the land required for a solely above ground SuDS solution. It is clear from Option 2 that a full above ground SuDS solution is achievable, in accordance with local policy (SCLP9.6). It is however acknowledged that this approach would have an impact on the quantum of development. Based on the revised site layout submitted, SCC LLFA are of the understanding that SuDS Option 1 is what the Applicant wishes to progress. This does not accord with local policy. This is the basis of SCC LLFA's holding objection. If the LPA were to advise that in the planning balance, they are not seeking full policy compliance RE above ground SuDS, SCC LLFA could reassess the application on that basis. However, at the time of this response, no such discussion has taken place and thus, the proposal is contrary to local policy. Given this is a full application, there is no scope to progress the design with a view to assessing both options further. To be clear, SCC LLFA have not considered the technical details of either Option 1 or Option 2. The above point of principle needs to be resolved and a firm solution put forward before any technical assessment is undertaken. The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required in order to overcome the objection(s).

## Non statutory consultees

Consultee	Date consulted	Date reply received
SCC Fire and Rescue Service	12 January 2021 16 April 2021	19 January 2021 No response
Summary of comments: No objection subject to condition for fire hydrants.		

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	12 January 2021 16 April 2021	11 May 2021 No response
<p>Summary of comments:</p> <p>Thank you for reconsulting us on this application, we wish to update our previous comments (January 2021) and make a holding objection for the following reasons:</p> <p>Hedgerows are a UK and Suffolk Priority habitat (under section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)). It appears that the proposed development will result in the uncompensated loss of this habitat present within the site. The Preliminary Ecological Assessment Addendum (Basecology, December 2020) identified this habitat in the south western corner of the site, however the landscape proposals schedule this for removal and replaced by a non-native <i>Ligustrum ovalifolium</i> hedgerow. The National Planning Policy Framework (NPPF) (2019) and SCLP10.1 of the Suffolk Coastal Local Plan seek to ensure that all development maintains and enhances the environment, including protecting Priority habitats and species. Consent should therefore not be granted for any development which would result in the uncompensated loss of Priority habitats. Therefore, the native hedgerow should remain and enhanced. As this is to be included within garden area, then further native hedgerow planting, of a greater length than the hedgerow currently present, will be required within the Public Open Spaces onsite. This should incorporate a diverse range of native species.</p> <p>We note that the landscape proposals contain a range of native and non-native species planting. This includes within the Sub Canopy Mix B bordering the woodlands on the northern and western boundaries, where the non-native cherry plum <i>Prunus cerasifera</i> are proposed to be planted amongst native species. Furthermore, non-native standard trees are proposed in this area, including walnut varieties such as <i>Juglans regia</i> "Lara", and domesticated varieties of native species such as <i>Fagus sylvatica</i> "Purpurea". This planting is recommended within the Preliminary Ecological Assessment Addendum in order to buffer the woodlands from disturbance caused by the development. In order to achieve this and to maximise the potential for biodiversity, the new tree planting should comprise of a diverse range of native species. Therefore, we recommend that the non-native species proposed for planting in these sections are removed and replaced with native species instead, which increases the value of this section for biodiversity. We also note that most of the Public Open Space area is to be sown with turf. In order to increase the value of this area for biodiversity, a wildflower mix should be sown.</p> <p>We are concerned that areas of the Sub Canopy planting are incorporated into gardens. As this planting was recommended within the ecology report to buffer the impacts of the development upon the areas of woodland, then we recommend that this is included outside garden boundaries. This is to ensure that appropriate management to maintain the functionality of the buffer is carried out.</p> <p>We are pleased to see that hedgehog links provided within the fencing of garden boundaries to</p>		

maintain connectivity for the species. In order to provide connectivity with habitats of value to the species, we recommend that hedgehog permeable boundaries should be incorporated into fencing bordering onto the woodlands.

Consultee	Date consulted	Date reply received
East Suffolk Housing Development Team	12 January 2021 16 April 2021	14 January 2021 28 April 2021

Summary of comments:

I note the changes of the affordable rented housing scheme from 9x1 bed flats and 3x2 bed flats to 9x1 bed flats and 3x2 bed houses. Unfortunately, there is a greater need for family size housing in Rendlesham.

The number of applicants with a local connection to Rendlesham needing a two bed, 4 person house is 14 , whilst there are 14 applicants needing a 3 bed, 5 person house.

To meet the Councils housing need, I would advise a reduction in the number of flats for rented accommodation and an increase in the number of 2 and 3 bed houses.

Consultee	Date consulted	Date reply received
East Suffolk Economic Development	12 January 2021 16 April 2021	No response No response

Summary of comments:

No response received.

Consultee	Date consulted	Date reply received
Disability Forum	12 January 2021 16 April 2021	21 January 2021 22 April 2021

Summary of comments:

This was not the easiest of applications to go through.

The design of all the dwellings gives much concern as it appears that the majority of them are designed with steps to the front entrances with some of them appearing to have ramped access to doors on the side elevations of the dwellings.

We therefore object in principle to this application as disabled people should be able to access all the entrances and especially the front doors!

The application is for 75 dwellings, 12 of which are affordable for rent, and 13 of which are for ownership. The application indicates that wheelchair accessible provision is in the Sudborne and Blakenham designs.

All the dwellings should be visitable to everyone and meet Part M4(1) of the building regulations. As a minimum 50% of all the dwellings should also meet Part M4(2) of the building regulations and therefore be accessible and adaptable.

Our view remains that 3% of the dwellings in a housing development of this size should be bungalows as opposed to the flats planned for this scheme but the drawings are so difficult to view on line that some of the flats can be defined in this instance as bungalows.

All footpaths throughout the site should be wide enough for wheelchair users, with a minimum width of 1500mm, and any dropped kerbs should be absolutely level with the road for ease of access.

Surfaces should be firm, durable and level. No loose gravel, cobbles or uneven setts should be used.

Provision is made for visitor parking on the site and within this, at least two of the spaces should meet the requirements of a disabled parking space. That provision does not appear to be in place on the site plan.

We do not see why East Suffolk Council cannot encourage those who put in planning applications to consider that those who are consultees can read and understand their drawings more easily than one such as this.

Consultee	Date consulted	Date reply received
SCC Andy Osman Emergency Planning	12 January 2021 16 April 2021	No response No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
Police - Alan Keely Crime Reduction Beccles Police Station	12 January 2021 16 April 2021	04 February 2021 No response
Summary of comments: On behalf of Suffolk Constabulary, I have viewed the available plans and would like to register the following comments with regards to Section 17 of the Crime and Disorder Act. As the proposed development area comprises open land, historically it is a reasonably low crime area. However, a number of criminal offences have been recorded around the surrounding area, particularly antisocial behaviour (see para 4). Comments have been made over concerns regarding the layout of previous applications, however, from looking at the current plans the designers should be applauded for the way the area has been set out and in particular how the positioning of properties have been angled to incorporate surveillance for new house owners' parked vehicles. The positioning also affords surveillance for the middle Open Spaced Area, proposed Play Area and to some small degree the new Pumping Station. It is appreciated that designing parking to accommodate good surveillance and enough spaces for both home owners' and visitors', along with allocating garages for every household can be a challenge. So again, the designers should be applauded for designing as many spaces as possible into areas where they will have surveillance from either their own or a nearby property. However, a small minority of the parking for some plots is a concern that include: a) Parking and garaging areas are set too far back for plots 8-11, 16, 19-20, 22-23. b) Parking for plots 6, 31, 49, 53 and plot 74-75 are too far to the side of their respective properties. c) Rear parking appears to have been incorporated for plots 28-29. The Bin		

Storage areas are a concern, along with the central footpath where it runs along the rear of plots 26-27 and 32-37. It is noted that the current properties at number 17 and 25 on Garden Square have a footpath that borders this development by plot numbers 63-68, which is also a concern. Whilst it would be appreciated if the above concerns could be taken into account and if possible alterations or further security measures made, the police have no objections to these new well laid out proposals.

Consultee	Date consulted	Date reply received
SCC Section 106 Officer	12 January 2021 16 April 2021	14 January 2021 22 April 2021
Summary of comments: No objection (S106 legal agreement and CIL contributions apply).		

Consultee	Date consulted	Date reply received
East Suffolk Design and Conservation	12 January 2021 16 April 2021	No response No response
Summary of comments: No response required		

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	12 January 2021 16 April 2021	2 February 2021 27 April 2021
Summary of comments: Internal Planning Services consultee - comments included within the planning considerations section of this report.		

Consultee	Date consulted	Date reply received
SUSTRANS	12 January 2021 16 April 2021	No response No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
SCC Rights Of Way	12 January 2021	No response
Summary of comments: Discussions have been on going with this consultee and have informed the Highway Authority's response.		

Consultee	Date consulted	Date reply received
Waste Management Services - East Suffolk Norse	12 January 2021 16 April 2021	No response No response
Summary of comments: No response received.		

Consultee	Date consulted	Date reply received
East Suffolk Drainage Board	N/A 16 April 2021	29 January 2021 26 April 2021
Summary of comments: No objection (informatives apply).		

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	12 January 2021 16 April 2021	15 January 2020 19 April 2021
Summary of comments: No objection subject to conditions.		

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	12 January 2021 16 April 2021	26 January 2021 19 April 2021
Summary of comments: No objection subject to conditions on unexpected contamination and the provision of a noise attenuation fence.		

Consultee	Date consulted	Date reply received
East Suffolk Ecology	12 January 2021 16 April 2021	No response No response
Summary of comments: Internal Planning Services consultee - comments included within the planning considerations section of this report.		

Consultee	Date consulted	Date reply received
East Suffolk Planning Policy	12 January 2021 16 April 2021	No response No response
Summary of comments: No response required.		

Consultee	Date consulted	Date reply received
Ipswich & East Suffolk CCG & West Suffolk CCG	12 January 2021 16 April 2021	2 February 2021 10 May 2021
<p>Summary of comments:</p> <p>Please be aware that the CCG has previously responded to this planning application earlier through the planning stages and the original response is still up to date for the current position of primary care in the area. The CCG will therefore not be making another HIA to go with this application and would like to continue to use the previous comments in the previously entered HIA.</p>		

## Publicity

The application has been the subject of the following press advertisement:

Category	Published	Expiry	Publication
Major Application	21 January 2021	11 February 2021	East Anglian Daily Times

## Site notices

General Site Notice	Reason for site notice: Major Application Date posted: 27 January 2021 Expiry date: 17 February 2021
---------------------	--

## 6. Planning policy

- 6.1. National Planning Policy Framework 2019
- 6.2. East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020 policies:

The site is allocated for the development of approximately 50 dwellings by Policy SCLP12.61 of the East Suffolk Council Suffolk Coastal Local Plan (adopted September 2020) – [Local Plan - East Suffolk Council - Suffolk Coastal Local Plan \(Adopted September 2020\) - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#)

- SCLP3.1 - Strategy for Growth
- SCLP3.2 - Settlement Hierarchy
- SCLP3.3 - Settlement Boundaries
- SCLP5.1 - Housing Development in Large Villages
- SCLP5.8 - Housing Mix
- SCLP5.10 - Affordable Housing on Residential Developments
- SCLP7.1 - Sustainable Transport
- SCLP7.2 - Parking Proposals and Standards
- SCLP8.2 - Open Space
- SCLP9.2 - Sustainable Construction

- SCLP9.5 - Flood Risk
- SCLP9.6 - Sustainable Drainage Systems
- SCLP9.7 - Holistic Water Management
- SCLP10.1 - Biodiversity and Geodiversity
- SCLP10.4 - Landscape Character
- SCLP11.1 - Design Quality
- SCLP11.2 - Residential Amenity
- SCLP11.4 - Listed Buildings
- SCLP11.6 - Non-Designated Heritage Assets
- SCLP11.7 - Archaeology

### 6.3. Rendlesham Neighbourhood Plan

- Policy RNPP3 New residential or mixed use development is required to make provision towards meeting identified local need for allotments, orchards and growing spaces.
- Housing and Transport Objectives

## 7. Planning considerations

### Principle of Development

- 7.1. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that, if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, determination must be made in accordance with the plan unless material considerations indicate otherwise. The relevant policies are set out above.
- 7.2. The Local Plan was adopted in September 2020 and sets out the level of growth which needs to be planned in the area and identifies where that growth should be located for the period up to 2036.
- 7.3. The site is allocated in the Local Plan under Policy SCLP12.61 for the development of approximately 50 dwellings. The application seeks 75 dwellings. The principle of a greater number of dwellings, also at 75, was accepted within the previous appeal and evidence was provided in the public inquiry to confirm that this great number of homes was both suitable for this location and in compliance with the development plan.
- 7.4. The principle of residential development on the site is therefore accepted. This allocation forms part of the delivery of the strategy of the Local Plan as set out in Policy SCLP3.1 - Strategy for Growth, which sets out that opportunities for economic growth and for creating and enhancing sustainable and inclusive communities includes appropriate growth in rural areas that will help to support and sustain existing communities.
- 7.5. The approximate number provided for in the allocation policy is neither a limit nor a goal, it is a guide based up on the analysis and evidence available at the time of the examination of the Local Plan. In this case a leading limitation on the amount of developable area on the site was the extent of 'cordon sanitaire' required around the adjacent sewage

treatment works. The evidence provided within this application demonstrates the extent of the cordon sanitaire accepted by Anglian Water and Environmental Protection. This has enabled the applicant to present a layout proposing the efficient use of the developable area at an appropriate density for this edge of village location leading to a total of 75 homes.

- 7.6. The environmental effects of the 75 homes including in combination with a further 75 homes in the village also presented for consideration at this same planning committee is addressed in later sections of the report.

### Highways Considerations

- 7.7. The village of Rendlesham and the wider area was confirmed to have capacity to support two allocations for approximately 50 dwellings each in the Local Plan. In particular, focus was placed on the capacity of the Melton crossroads, the Melton level crossing and traffic utilising routes through local villages such as Eyke and Campsea Ashe. The local transport network relies upon the A1152 and B1069 which both lead from Rendlesham to the south west and northeast respectively. These routes also serve the wider Deben peninsula and rural villages east of the A12. Along with the residential part of Rendlesham, the Bentwaters Airbase employment site is also a significant source of traffic on these routes.
- 7.8. The two combined planning applications for the village, at a total of 150 homes would be a 50% increase in the approximate number of new allocated homes for the village, which currently has approximately 1,224 dwellings. The additional 25 homes on this site and 50 additional in total for consideration would not have a significant effect on overall traffic number on this A and B road network. The proposal would accord with SCLP7.1 (Sustainable Transport) and it has objection form the Highway Authority. In addition, there has been no objection from Network Rail in respect of traffic effects on the Melton level crossing.
- 7.9. SCLP7.1 is also a policy which seeks to encourage travel by non-car modes. Rendlesham is a sustainable village and a substantial sized village which does include shops, a primary school, doctors surgery, dentists, church, community centre, sports facilities and one of the District's largest employment sites within a reasonable walking distance. Despite the relative isolation of the village from immediate larger settlements it is a sustainable community where residents can live, access employment, education, facilities and services without the need to travel by car. It is however recognised that car ownership is reasonably high with only 61 dwellings which do not own cars in the village ([Rendlesham-Village-Profile.pdf \(eastsoffolk.gov.uk\)](#)) and this is to be expected, particularly because many residents do commute out of the village to other towns in the area for employment. Development must therefore be designed with both sustainable local travel in mind and car ownership.
- 7.10. As a primary consideration, the site has been designed to accommodate good quality pedestrian access into its layout. This was a major shortfall in the previous schemes and an issue upheld by the Planning Inspector. However this resubmission pays good attention the walking routes through the site, ensuring that they are direct, legible, well observed and attractive. The Highway Authority accepts, subject to a couple of small changes that the site will provide safe walking facilities. It will also connect conveniently onto Tidy Road as the primary walking route from the development into the village centre.

- 7.11. The central spine road has been suitably designed to accommodate drainage swales and segregated footway on one side with a standard roadside pavement on the other. This is an attractive and positive arrangement for walking. The road also features a number of 90 degree bends and corners which add both interest to the route and encourage slower driving speeds. Both Garden Square and Tidy road are suitable and were always intended to serve this site for vehicular access as part of its inclusion in the original Rendlesham Masterplan.
- 7.12. A large number of the homes on the development would be served by shared private drives with only the central spine road being intended for adoption by the Highway Authority. This is acceptable but it would result in the majority of residents having management company costs in occupying the site, which is an expectation in most developments of this scale anyway. It will be important for the management company structure to be agreed under a condition as this would also extend to management of open spaces.
- 7.13. There is no objection from the Highway Authority to the extent of private road status proposed and in this submission those shared surface route have been effectively designed for good pedestrian and cycle awareness to ensure that they are used a lower speeds and that priority is given to pedestrians and cyclists. This is an acceptable design approach which is also complemented by a central dedicated pedestrian walking route running east-west.
- 7.14. Beyond the edges of the site, the existing pedestrian pavement routes in Rendlesham connect all services and facilities safely. It is considered highly desirable for the full route from Sycamore Drive, along Garden Square and through the site to Tidy Road to be adopted. This cannot be required but at the very least it should be finished to an entirely adopted standard on both the road and footways, including along Garden Square which remains unfinished. This road currently is not adopted though it provides an adoptable sized pavement leading to the adopted Sycamore Drive.
- 7.15. A pedestrian connection is also proposed through the Peace Palace site to the south. This is a privately owned site in the same ownership and it is not intended to be an adopted route or a public right of way. However, it will help to integrate two adjacent communities.
- 7.16. The new Public Right of Way connection to the north east corner of the site won't provide any connectivity to services and facilities but it will provide a vital opportunity to connect this development and existing community with the countryside and wider public right of way network. Because the village currently only has one off road walking route connected to it, this will add a further walking opportunity in the countryside and will likely lead to less driving from Rendlesham to other walking destinations in the area.
- 7.17. Finally, the proposed development will make a proportionate and necessary Section 106 contribution to provide new Real Time Passenger Information displays for a village bus stop. Whilst this wont add additional public transport opportunities it will better enable the use of existing bus services in order to reduce reliance on private cars.
- 7.18. The development includes a good mix and quantity of parking, with at least one space per property and 2-3 spaces for the vast majority of homes. A good range of street integrated

visitor parking spaces are included (although three do need to be deleted from the plan). The development included a relatively small number of garages and therefore these are not heavily relied upon as part of the parking provision. It is a positive design feature to have so few garages, giving a lower density appearance and more open street scenes. However, a condition is required to ensure that every property is provided with a good quality covered cycle store and/or shed provision and some details of this have already been provided.

- 7.19. In conclusion, the proposed development would be well located and designed to reduce reliance on private cars whilst also being designed to accommodate a modern level of car ownership and use. There is no objection from the Highway Authority, subject to some very minor changes to the plans and the proposal would accord with the expectations of SCLP12.61 and SCLP7.1 and would be both sustainable and safe.

### Design

- 7.20. The background to this application involves two past applications, a dismissed appeal and pre-application enquiries between those. It is clear from past refusals and the appeal decision that the strong design principles previously proposed by the applicant were not compatible with this site or its surroundings to achieve a suitable, safe and cohesive community under current planning expectations. It was therefore very pleasing to see the applicant adopt a fresh design approach to the layout of the site with a new designer. Previously the layout of the development was very led by all dwellings facing east and the consequence was an arrangement which formed multiple single sided culs-de-sac.
- 7.21. This proposal does still include three culs-de-sac and these are not negative design features in themselves at all, they are a typical and welcomed element of most developments. This time however, they are dual fronted, ensuring that dwellings on both sides face each other and there are no instances in this scheme of back garden boundaries presenting onto the roads or culs-de-sac. The designer has made a conscious effort to ensure that active frontages are key consideration throughout the development and this has created a diverse and interesting layout.
- 7.22. Importantly this achieves well observed spaces and routes which would be safe and welcoming for pedestrians and residents. It also aids important community cohesion and interaction with residents where all homes will feel a close association with other homes both beside and opposite them. This will benefit both future residents on the development and existing residents in the village walking through or visiting the development. In particular, the route from Tidy Road now presents the frontages of six homes and good quality landscaping.
- 7.23. The proposal has also been designed around a central public square area, with homes and apartments fronting onto it. This formal arrangement to the centre of the site provides a focal point, legibility and identity to the community. It also aligns with an east-west landscaped walking route. This route is as a result of an existing drain which cannot be built over. The designer has chosen to work with this constraint and make it a landscaped public open space feature which will connect both sides of the site both in terms of movement and views.

- 7.24. Another constraint on this development is the cordon sanitaire around the sewage treatment works. This limits the area where homes can be placed and therefore it has created an area of open space larger than would normally be expected of 75 homes. The location and form of this open space has not previously been a cause for concern in past applications but it was the arrangement of dwellings around it which was previously poorly done. Now we have an open space with well observed spaces and interaction between landscaping and homes.
- 7.25. The architectural design of the dwellings has been relatively constant throughout the applicant's promotion of this site. The homes are largely designed to be similar to the applicant's previous development to the south which has a strong neo-Georgian architectural identity. The homes are specifically designed around internal layout and living principles to ensure that spaces are well lit by natural light and clear symmetry and architectural logic is identifiable in the elevations and footprints of the homes. The Garden Square and Gardenia Close development to the south present good architectural design and character and generously landscaped plots. This has fed into this design and the spacious arrangement of homes and the spaces around them is welcomed.
- 7.26. The architectural design, materials and detailing has a specific style, whilst not entirely reflecting 21<sup>st</sup> century architecture and some modern tastes, the homes remain attractive and compatible with the area. There is one exception to the style with a contemporary bungalow in the south west corner. This is well designed and doesn't create conflicts in its contrasting appearance in its end of cul-de-sac location.
- 7.27. Overall, the design and layout of the development is a success in this submission and will create a unique and characterful development which also integrates well with its surroundings. This submission from the applicant and their designer should be applauded for working closely with the council in a collaborative manner to overcome past differences and the identified failures of previous schemes to achieve this proposal.

### Housing mix

- 7.28. Policy SCLP5.8: Housing Mix seeks that "New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location, reflecting where feasible the identified need, particularly focusing on smaller dwellings (1 and 2 bedrooms)". The proposed development provides the following housing mix.

Market housing - Proposed						
No. bedrooms	1 bed	2 bed	3 bed	4+ bed	Unknown	Total
Detached		6	6	11		23
Semi-detached			9	2		11
Maisonettes		8	8			16
Apartments						0
<b>Total</b>	<b>0</b>	<b>14</b>	<b>23</b>	<b>13</b>	<b>0</b>	<b>50</b>
Social, Affordable or Intermediate Rent - Proposed						
No. bedrooms	1 bed	2 bed	3 bed	4+ bed	Unknown	Total
Detached						0
Semi-detached		3				3
Maisonettes						0
Apartments	9					9
<b>Total</b>	<b>9</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>12</b>
Affordable Home Ownership - Proposed						
No. bedrooms	1 bed	2 bed	3 bed	4+ bed	Unknown	Total
Detached						0
Semi-detached		4				4
Maisonettes						0
Apartments		9				9
<b>Total</b>	<b>0</b>	<b>13</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>13</b>

- 7.29. This achieves a good balance of open market homes across two, three and four bed open market units and large proportion of smaller affordable units. Feedback from the Housing Strategy and Enabling Manger on behalf of the Head of Housing sets out that there is a need for more affordable 2 and 3 bed houses. The flat led approach to affordable housing delivery does address some need which the village has in the case the proposal has approached affordable housing delivery through two 9 unit apartment blocks in two locations on the site. These blocks are a key element of the design of the site and provide a tenure blind and integrated approach to delivering affordable homes in a way which would be well suited to housing associations.
- 7.30. Despite the lack of larger affordable homes on balance the appropriate proportion, delivery strategy and design on this site is acceptable.
- 7.31. The applicant has confirmed that at least 50 pct of the dwellings will be accessible and adaptable dwellings that meet the requirements of Part M4(2) of the Building Regulations, as required by Policy SCLP5.8. In addition, in response to comments from the Disability Forum, they state that they have “chosen to follow the optional requirement M4(3) of the Building Regulations for wheelchair user dwellings, with its recommendations on access

paths, gates, ramps, steps and associated issues. Ramps are an important feature of the designs, as all the buildings in the proposed development have a raised ground floor of 460 mm rather than the usual 150 mm. This avoids single steps (ref M4(3) 11g), as recommended on the stepped entrances into houses". This has been emphasised in response to comments from the Disability Forum.

## Landscape

- 7.32. In respect of external landscape effects of this development, it benefits from a very enclosed and unexposed position. It is surrounded on two sides by development and the southern edge was previously left without a landscaped boundary as this site was allocated at the time. So expansion of the village north was always anticipated and this accords with how the 1990's masterplan vision for Rendlesham integrated with its rural setting. The northern and western boundaries are almost entirely woodland creating an attractive backdrop to the open space and providing a verdant edge between plots and over the northern edge rooflines. The western edge is onto agricultural land with a well-established hedgerow to be retained.
- 7.33. There are no identified landscape impacts as a result of this development and the plots have been laid out in a manner which ensures that the majority of existing trees on the site and adjacent to the site will be preserved and protected.
- 7.34. In addressing the Arboricultural and Landscape Officer's initial feedback the applicant has responded during the application with a fully detailed landscape scheme for the site. This was submitted in March as a detailed landscape masterplan, management and maintenance plan and measured works schedule for both housing plots and open space. This extent of detail is usually submitted under a pre-commencement condition so it is very reassuring to see it submitted at this stage. There are some minor changes to plans still to be made following comments on the landscaping from Suffolk Wildlife Trust and the applicants response to those but they won't significantly change the proposals considered in this report.
- 7.35. A good quality proposal for landscaping has been prepared, taking advantage of a wide range of spaces and planting opportunities. This has been designed in a mix of formal and natural areas and takes some inspiration from the generous landscaping to the south in Garden Square and Gardenia Close. An actively observed play area is proposed and although this is adjacent to the on-site sewage pumping station, this should not adversely affect the enjoyment of that facility.
- 7.36. The proposal includes well landscaped routes with a mix of hardsurface and hoggan paths. These allow for a short walking route around the open space whilst also connecting up with the wider Public Right of Way route proposed.
- 7.37. A large area of the open spaces is proposed to be a community orchard and this would make both an attractive and accessible feature. The applicants have proposed this as their contribution to meeting Rendlesham Neighbourhood Plan policy RNPP3 which states "New residential or mixed use development is required to make provision towards meeting identified local need for allotments, orchards and growing spaces.". It is clear that there is a need for allotments in the village and this is something which this site alone cannot

satisfy, and a large allotment provision would not be proportionate to the scale of this development. The Council is keen to work with the Parish Council to explore more comprehensive opportunities for village allotments but in this case the community orchard provision is seen as suitably scaled for this development and meeting part of the identified for of community planting space desired by the Neighbourhood Plan.

- 7.38. The layout of the northern part of the site with rear gardens onto the external woodland is not typically the preferred way to integrate homes into such an edge. It is preferable to have frontages onto woodland so that trees can be managed outside of private gardens. However, in this case there are other constraints and considerations affecting how the site is designed and they outweigh the need to reorientate these homes. The plots proposed on that edge do have generous rear gardens so overhanging trees and sunlight should not cause issues on the living conditions of residents.
- 7.39. In conclusion this proposal is entirely compatible with the local landscape and the surrounding residential areas. It would create good quality open spaces and urban landscaped areas and private plots and streets have been designed around a good level tree planting.

### Ecology

- 7.40. The site has been subject to the necessary species and habitat surveys and the Council's Ecologist is satisfied with the conclusions of those along with the recommendations to be secured by condition. The development will bring areas of biodiversity value and therefore a Landscape and Ecology Management plans will guide future maintenance and protection of features and habitats. In addition, a lighting strategy will be required under a condition in order to address any impacts on bats foraging in the area, particularly the woodland edge.
- 7.41. The key ecological consideration for this site has been the ability to address the Habitats Regulations through suitable mitigation to avoid direct impacts on the nearby Sandlings Special Protection Area. Rendlesham is very unfortunate in having just one public footpath walking route leading from the residential area and this route leads south directly into The Sandlings. The limited dog walking opportunities cause an intensified impact on that route and more driven dog walks from homes taking residents into other parts of The Sandlings in the area.
- 7.42. East Suffolk has established clear expectations of developments for over 50 dwellings which requires a good quality 2.7km walking route to be demonstrated from the site in order to pass an Appropriate Assessment under the Habitats Regulations. Achieving this was a matter of much debate in the previous appeal but eventually a solution was agreed and that has followed through into this application. Through landowner commitment and S106 funding for the County Council to deal with a Public Right of Way creation agreement, a new loop route of footpath will be created to the east of the site which will also enable connectivity with the wider countryside and footpath routes to the north west.
- 7.43. As previously acknowledged, this is a significant benefit in rights of way terms but it also delivers necessary mitigation for this purpose. Having considered the proposed avoidance and mitigation measures above Officers conclude that with mitigation the proposal will not have an Adverse Effect on the Integrity of the European sites included within the Suffolk

Coast RAMS. Natural England have previously confirmed this position and will confirm it for the purpose of this application prior to it being issued. Based on our established guidance, subject to appropriate mitigation in the form of a per dwelling contribution to the RAMS strategy and provision of on and off-site measures in the form of the walking route to be secured in a S106 Agreement.

- 7.44. Officers consider that the proposal is acceptable in this regard in accordance with SCLP10.1 (Biodiversity and Geodiversity).

#### Drainage and Flood Risk

- 7.45. The application site is fully within Flood Zone 1 and therefore at the lowest risk of any flooding event. Concerns have been raised by some neighbours in respect of current surface water drainage issues on the southern edge of the site. The topography of the site is relatively flat but with a slight fall in levels north to south. Photographs provided by neighbours do show poor field drainage and minor flooding on the southern boundary. Under the existing use of the site this may be due to poor land drainage or impacts of the the previous development affecting the drainage of land to the north such as compaction of soils or severing of field drains.
- 7.46. To comply with policy SCLP9.6 (Sustainable Drainage Systems) and the NPPF the proposed development should use sustainable drainage systems (SuDS) to drain surface water , unless demonstrated to be inappropriate. Sustainable drainage systems should:
- a) Be integrated into the landscaping scheme and green infrastructure provision of the development;
  - b) Contribute to the design quality of the scheme; and
  - c) Deliver sufficient and appropriate water quality and aquatic biodiversity improvements, wherever possible. This should be complementary of any local designations such as Source Protection Zones.
- 7.47. The approach to such drainage within this application has been subject to revision during the course of the application. This has concluded with two options being presented, though Option 1 is the only option accommodated within the layout and design of development provided.
- 7.48. Option 1 seeks to maximise the use of above ground SuDS within the existing layout but relies upon below ground storage elements. Option 2 assess the land required for a solely above ground SuDS solution. It is clear from Option 2 that a full above ground SuDS solution is achievable, in accordance with SCLP9.6 but this approach would have an impact on the design of the development and number of homes.
- 7.49. Option 1 utilises a combination of roadside swales to move road water through the site along with two open drainage basins and an underground storage system under the central square open space. Option 2 would not include the underground storage and would require two larger basins at both vehicular access points into the site on the southern boundary.
- 7.50. Option 2 is not compatible with the design which has been proposed and which was primarily designed around Option 1. The location of the two larger basins would place them in positions outside of the open space and in order for them to be integrated effectively they should become part of an open space arrangement. It is considered that in

this instance, because there are other physical and design factors which have influenced the locations of open spaces the open basins would result in a significant and disproportionate amount of open and undevelopable space. The basins would be negative design features at the immediate entrance points into the site, which are fixed and where a lot of attention has been given to overcoming design shortfalls in these locations in the previous scheme.

- 7.51. Option 2 would result in a reduction of at least nine dwellings and whilst this would be consistent with the approximate number of the allocation, as described previously, at 75 dwellings the site remains at a modest density and with a substantial amount of open space included.
- 7.52. Option 1 makes effective dual use of the central square and has been designed in a manner where it could be adopted by Anglian Water instead of a management company. It is also not the only form of attenuation with swales and basins in a SuDS form remaining a part of the design.
- 7.53. Subject to the final version of the Flood Risk Assessment and Surface Water Drainage Strategy being submitted and only making reference to Option 1, the Lead Local Flood Authority have confirmed that they do not object to the proposals and that the option 1 proposals are technically sound.

#### Environment and Amenity

- 7.54. The site is located adjacent to a sewage treatment plant operated by Anglian Water. This serves the village and has associated noise and odour effects. Through the allocation history of this site it has been a known constraint to address with the need to establish a 'Cordon Sanitaire' into the site. This being an acceptable distance at which residential development could take place without harmful effects on residents and where that residential use would not compromise the efficient running of the waste water facility or lead to a need for Anglian Water to undertake significant improvements as a result of the increased residential proximity.
- 7.55. The Cordon Sanitaire has been established in this proposal through odour modelling and circular boundary for that has dictated the closest proximity of homes to the source of potential odour. The layout plan is informed by this and it is a large influence on the amount of open space to be provided. Whilst potential odours may create a perception of the open space being less attractive at times this would not prohibit this being an enjoyable and valuable space. It will have a good standard of planting and a large amount of space at the edges of the area.
- 7.56. Environmental Protection have commented on this matter that it is "very much based around the water industry requirements. As such and given the cordon sanitaire area around the water treatment plant, the odour assessment should be approved by Anglian Water prior to acceptance of the development proposals". Anglian Water have responded stating that "we can accept that the amenity of the development as currently proposed, is unlikely to be impaired by the emissions of odour or noise that would be anticipated from the normal operation of the Rendlesham WRC". The proposal therefore satisfies this requirement and important planning policy consideration which has for many years

affected the ability for this site to come forward and has made it difficult to confirm the full extent of home the site may deliver.

- 7.57. Also associated with the treatment works is its noise effect. This has also been assessed in a professional report and accepted by Environmental Protection subject to the proposed noise attenuation fence being installed on the northern boundary.
- 7.58. The proposal is accompanied by a Contaminated Land Assessment which finds that there is a low risk of contamination on the site and any unexpected contamination can be covered by a standard condition.
- 7.59. The application is also supported by an Air Quality Assessment, in order to demonstrate that there would be no local or wider air quality impacts from the traffic associated with 75 homes. This concludes that there will not be a significant impact and this accepted by Environmental Protection. It has been suggested that in order to encourage the use of electric vehicles the developer should provide domestic and visitor electric vehicle charge points, along with a travel plan to encourage and enable sustainable travel.
- 7.60. In terms of residential amenity effects of the proposed development on neighbouring properties, as a result of the re-design in this scheme a number of changes have attempted to address this. This includes greater distances from neighbouring boundaries to the south and orientations which address the relationship with adjacent properties first. None of the proposed dwellings would adversely affect the residential amenity of neighbours through loss of light, loss of privacy or overbearing dominance.
- 7.61. The increase in traffic through both Garden Square and Tidy Road would not be significant enough to adversely impact on the peaceful enjoyment of homes in both adjacent estates. There would be temporary effects of noise and disturbance through construction. Some objections have raised concern that this would be prolonged through potential slow delivery of homes. The rate at which the homes are delivered is outside of the Council's control but the development is accompanied by a phasing plan ensuring the phases are delivered in an organised manner. This can all be controlled and monitored through a Construction Management Plan to be submitted under a condition.
- 7.62. The previously proposal for this site had a large number of properties which had uncomfortably close relationships between side first and second floor windows resulting in poor privacy for future residents. That has largely been designed out of this scheme and the few instances can be controlled through the requirement for obscure and fixed glazing.

### Infrastructure

- 7.63. The Infrastructure Delivery Framework appended to the Local Plan identifies the infrastructure needed to support new development. The Infrastructure Funding Statement (2019-2020) takes this information a step further through the allocation of District CIL, through the collection and use of s106 contributions or through planning conditions (such as highways works). The Parish Council would also receive 25% of the CIL received from this development which can be spent flexibly on local projects such as play and sports facilities, which would also serve residents of this development.
- 7.64. In terms of education provision, the Infrastructure Funding Statement (IFS) identifies the need for at least £362,000 of CIL funding for primary school capacity expansion in the

village. The application response from the County Council predicts the contribution as a result of this development to be £293,556.

- 7.65. For secondary expansion there are a number of secondary schools in the area which may need to be expanded and one new secondary school at Brightwell Lakes to be built. Taking a strategic view of the wider area it is very likely that some CIL funding generated by this development will feed into secondary school expansion to support growth and the County Council predicts the contribution as a result of this development to be £299,148.
- 7.66. Suffolk County Council confirm the need for a contribution to secondary school transport through a S106 contribution of £72,300.
- 7.67. Pre-school, Primary school, library improvements and waste infrastructure would also be funded through CIL.
- 7.68. In terms of health provision the Ipswich and East Suffolk Clinical Commissioning Group have stated that CIL funding will be sought to increase capacity and the IFS sets this at at least £108,000. However, it is understood that recent improvements have recently been made at the village surgery which may have already addressed the needs of this planned growth. This will be reviewed on an ongoing basis in regular discussions with the CCG on growth and CIL bids for expansion where and when required.

#### Benefits and harm of the development

- 7.69. Officers consider that the proposed development will provide a well-designed residential development with a good mix of homes. The development will yield a number of benefits including, amongst other things, affordable housing, green infrastructure and rights of way creation. There are also a number of economic benefits that will arise as a result and noting that this forms one of the strands of sustainable development, including Neighbourhood CIL, spent in the local economy and the short-term benefits of the construction employment.
- 7.70. This reports no direct or indirect harm from the development which is not due to be mitigated. There are no significant landscape impacts, no impacts on heritage and all biodiversity effects are to be addressed locally and cumulatively. The proposal would not result in severe or unsafe traffic impacts.
- 7.71. In all respects above the proposal has also been considered on a cumulative basis with the other planning application in Rendlesham (DC/20/3890/OUT) to be considered at this planning committee. Both are allocated sites in the Local Plan and both were also allocated previously in the former Local Plan. Collectively they are allocated for approximately 100 dwellings but they have both been submitted for 150 dwellings collectively (75 dwellings each). Each is considered on its own merits for its ability to accommodate that number but together they area also assessed in terms of the effects of an additional 50 homes beyond the number allocated in the local plan.
- 7.72. In terms of traffic, the additional 50 homes has not given rise to an objection from the Highway Authority and in particularly the most sensitive locations along the network such as Eyke, Campsea Ashe and Melton would not be severely affected by this increase, particularly when judged against paragraph 109 of the NPPF, which states “Development

should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

- 7.73. Cumulatively the number of homes would not change the Local Plan assessed effects of housing growth on protected sites and the greater number of homes both justifies better and wider local mitigation measures and the same proportionate, per dwelling mitigation contribution towards RAMS.
- 7.74. The greater number of homes would be mitigated in terms of infrastructure in the same way as the allocated number, primarily through CIL contributions which are calculated based on the floor area of dwellings proposed. Therefore, an increase in both Neighbourhood and District CIL would be generated to address both local and wider infrastructure needs, including education expansion and healthcare expansion.
- 7.75. There are no known physical constraints on infrastructure to absorb this increase. Up to date pupil generation assessments have been carried out in the County Council’s response to the applications to ensure that primary and secondary school pupils can be placed in local schools and some expansion can be achieved where required through CIL bids. The village medical centre has also recently undergone some expansion which should already serve planned growth according to recent feedback from the CCG.
- 7.76. Overall, therefore there are significant benefits in utilising allocated, sustainable sites for more efficient housing delivery and without adverse impacts on design, density or open space provision through the numbers proposed. The position therefore achieved by both proposals individually is therefore of benefit with no demonstrated harm. This is consistent with the aims of Paragraph 122 of the NPPF in achieving efficient use of land for development.

## **8. Conclusion**

- 8.1. This site has both a long planning history going back to the original 1996 Rendlesham masterplan and a more recent challenging history to reach this stage. The more recent applications have failed on grounds of poor design with the last refusal having been dismissed at appeal. However, this latest application has benefitted from a fresh take on the layout and design of the site and well progressed pre-application process. The merits of the location and nature of the site have now been able to shine through in a scheme which achieves good design.
- 8.2. As an allocated site this delivers on a plan-led approach to necessary housing growth in the District and achieves additional efficiency within the allocated area without an unacceptable density or any harm. Rendlesham is a very large village which has grown significantly over the early part of the 21<sup>st</sup> Century, however in the past 5 years it has seen very limited housing growth particularly whilst allocated sites like this were not coming forward. The site will provide a significant benefit to the housing needs of the village an area, which also has a notably young working age demographic. It is a sustainable location which can support housing growth currently planned and has the infrastructure and capabilities for expansion to support that.

- 8.3. A number of representations have made comments that this development won't provide for local housing need because of how the site is and may be marketed. It is acknowledged that the adjacent development has a specific sense of community based around the adjacent belief led community and the associated Peace Palace and that the developer of that site is the same applicant for this site. However, this planning permission goes with the land and not the applicant. It is not for the Local Planning Authority to dictate or control how properties may or may not be marketed. This application must be considered on face value and an open market and affordable housing development.
- 8.4. In respect of the affordable housing, the Section 106 agreement requires letting in accordance with local needs and the housing register and can be controlled in how it will be occupied. The applicant is eager to achieve Registered Social Landlord status to enable the housing to be locally managed. This is acceptable and subject to a number of non-planning requirements to achieve that status. The affordable housing will, in any case, remain under the obligations for its occupation in the mix of tenures as affordable housing proposed in the s106 agreement.
- 8.5. In conclusion, the proposal is a policy compliant scheme which delivers plan-led housing growth in a well designed manner. Paragraph 2 of the NPPF (2019) states that "Planning Law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise". That section of the law is contained in S38(6) of the Planning and Compulsory Purchase Act 2004. There are no material considerations which persuade that this development should be considered other than in accordance with the development plan and therefore it is recommended for approval.

## **9. Recommendation**

- 9.1. AUTHORITY TO APPROVE with conditions (including but not limited to those below), subject to the completion of a S106 Legal Agreement within six months to secure obligations (including but not limited to):
- Provision of 25 affordable dwellings;
  - Per-dwelling contribution to the Suffolk RAMS;
  - Provision and long term management of public open space;
  - Financial contribution to fund secondary school transport;
  - Financial contribution to fund improvement works to local bus stop;
  - Financial contribution to fund the creation of a new public right of way.
- 9.2. If the S106 is not completed within six months AUTHORITY TO REFUSE the application (at the time of writing the report the S106 was close to being signed).
- 9.3. **Conditions:**
1. The development hereby permitted shall be begun within a period of three years beginning with the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 as amended.

2. The development hereby permitted shall be completed in all respects strictly in accordance with the submitted plans and documents (to be listed)

Reason: For the avoidance of doubt as to what has been considered and approved.

3. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Strategic Policies SP1 and SP 15 of Suffolk Coastal District Council Core Strategy Development Plan Document (2013) and the National Planning Policy Framework (2012).

4. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Strategic Policies SP1 and SP 15 of Suffolk Coastal District Council Core Strategy Development Plan Document (2013) and the National Planning Policy Framework (2012).

5. The site shall be developed in a phased manner in accordance with the three phases set out on the phasing plan. No work, except site investigations, shall take place outside of the relevant phased area before the Council has been notified of commencement within that phase and all relevant conditions addressed within that phase (through a CIL commencement notice)

Reason: To ensure that the development is built out in accordance with the proposed phasing plan as a phased development.

6. Prior to the commencement of development, a scheme for the provision of fire hydrants within the development shall be submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: In the interests of fire safety.

7. The recommendations of the Preliminary Ecological Appraisal March 2018 shall be implemented in full.

Reason: In the interests of minimising the impacts on the identified ecological receptors.

8. Prior to the commencement of development full details of the mitigation/compensation measures (including nesting plots for skylark) and ecological enhancement measures identified in the Preliminary Ecological Appraisal (PEA) report (BasEcology, March 2018), shall be submitted to and agreed in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.

Reason: In the interests of minimising the impacts on the identified ecological receptors.

9. Prior to the commencement of development, a Construction Environment Management Plan (CEMP) and Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.

Reason: In the interests of minimising the impacts on the identified ecological receptors.

10. No development or vegetation clearance will commence within the breeding bird season (March-August inclusive) unless works have been immediately preceded by a breeding bird check undertaken by a qualified ecologist. Should a breeding bird be found located on the site, works shall only take place in accordance with the advice put forward by the ecologist, who will advise on suitable mitigation and buffer distances.

11. No development shall commence until means of protecting the trees on and surrounding the site have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

12. Prior to the commencement of development, soft and hard landscaping details will be submitted and will include the following: play equipment and features and other structures including public bins and signage.

13. The landscaping management plan for public amenity areas shall be implemented and all approved Landscaping shall be retained and managed in accordance with the standards and annual maintenance regime set out in the approved Landscape Management Plan.

14. Prior to the commencement of development full details of the acoustic bund/barrier adjacent to the northern boundary of the site shall be submitted to and approved in writing by the local planning authority. The approved acoustic bund/barrier shall be completed in accordance with the approved details prior to the occupation of the adjacent dwellings.

Reason: In the interests of residential amenity and to ensure root protection areas are not disturbed by compaction or excavation.

15. Prior to the commencement of development a sustainability statement which demonstrates that Sustainable Construction methods have been incorporated into the development proposal shall be submitted. The development shall thereafter be carried out in accordance with the approved details unless otherwise approved in writing by the Local Planning Authority.

Reason: in accordance with the sustainable construction objectives of policy SCLP9.2 of the East Suffolk (Suffolk Coastal) Local Plan.

16. No development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority (LPA).

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained.

17. No development shall commence until details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the LPA. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details. Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

18. Within 28 days of practical completion of the last dwelling or unit, surface water drainage verification report shall be submitted to the Local Planning Authority, detailing and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks, in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register. Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk <https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

19. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the LPA. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include:  
Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-

- iv. Temporary drainage systems

- v. Measures for managing pollution / water quality and protecting controlled waters and watercourses
- vi. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

20. In the event that contamination which has not already been identified to the Local Planning Authority (LPA) is found or suspected on the site it must be reported in writing immediately to the Local Planning Authority.

Unless agreed in writing by the LPA no further development (including any construction, demolition, site clearance, removal of underground tanks and relic structures) shall take place until this condition has been complied with in its entirety.

An investigation and risk assessment must be completed in accordance with a scheme which is subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and conform with prevailing guidance (including BS 10175:2011+A1:2013 and CLR11) and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority.

Where remediation is necessary a detailed remediation method statement (RMS) must be prepared, and is subject to the approval in writing of the Local Planning Authority. The RMS must include detailed methodologies for all works to be undertaken, site management procedures, proposed remediation objectives and remediation criteria. The approved RMS must be carried out in its entirety and the Local Planning Authority must be given two weeks written notification prior to the commencement of the remedial works.

Following completion of the approved remediation scheme a validation report that demonstrates the effectiveness of the remediation must be submitted to and approved in writing by the LPA.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

21. Details of the estate roads and footpaths to be adopted and not adopted, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority in the following order.

1. To submit details for the completion of the construction of the road and footway at Garden Square, and to get these approved prior to commencement.
2. To complete the construction of Garden Square to an adoptable standard prior to first occupation in Phase 1.
3. To submit details for the construction of the main road through the site from Garden Square to Tidy Road, and to get these approved prior to commencement.
4. To construct and complete the main road through the site from Garden Square to Tidy Road to an adoptable standard prior to first occupation in Phase 1.
5. To get Garden Square and the main road through the site adopted after Phase 3 is completed, ie when the roads are no longer used by construction traffic.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

22. Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

23. The approved scheme for areas to be provided for the manoeuvring and parking of vehicles including secure cycle storage shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

24. Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Pack (RTP) in accordance with the requirements in the Transport Statement. Not less than 3 months prior to the first occupation of any dwelling, the contents of the RTP shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include details of walking, cycling (for transport and recreation) and bus maps, latest relevant bus and rail timetable information, car sharing information, personalised Travel Planning and a multi-modal travel voucher. This pack should also provide information on any designated local dog walking routes accounted for the Appropriate Assessment to encourage residents to undertake dog walking in areas away from the Sandlings Special Protection Area.

Reason: In the interest of sustainable development

25. Before the development hereby permitted is occupied full details of the electric vehicle charging points to be installed in the development shall have been submitted to the Local Planning Authority and approved in writing.

Reason: To ensure that the development makes adequate provision for electric vehicle charging points to encourage the use of electric vehicles in accordance with the Suffolk Guidance for Parking and paragraph 110 of the National Planning Policy Framework.

26. No part of the development shall be commenced until details of a Public Right of Way link (as set out in the section 106 agreement) within the development site to link from Sycamore Drive to the northern east corner of the site have been submitted to and approved in writing by the Local Planning Authority. The link shall be laid out and constructed within an agreed timescale as part of phase 1 of the development.

Reason: To ensure that the necessary improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time.

27. Prior to commencement of development a waste management strategy for collections of domestic waste by a public or private operator shall be submitted and agreed. This will include details of bin storage locations and bin collection points and collection arrangements.

Reason: Due to the extent of unadopted roads and private drives creating potential difficulties in bin collection from individual properties or communal collection areas as access is dependent on agreement between the waste collection service and developer.

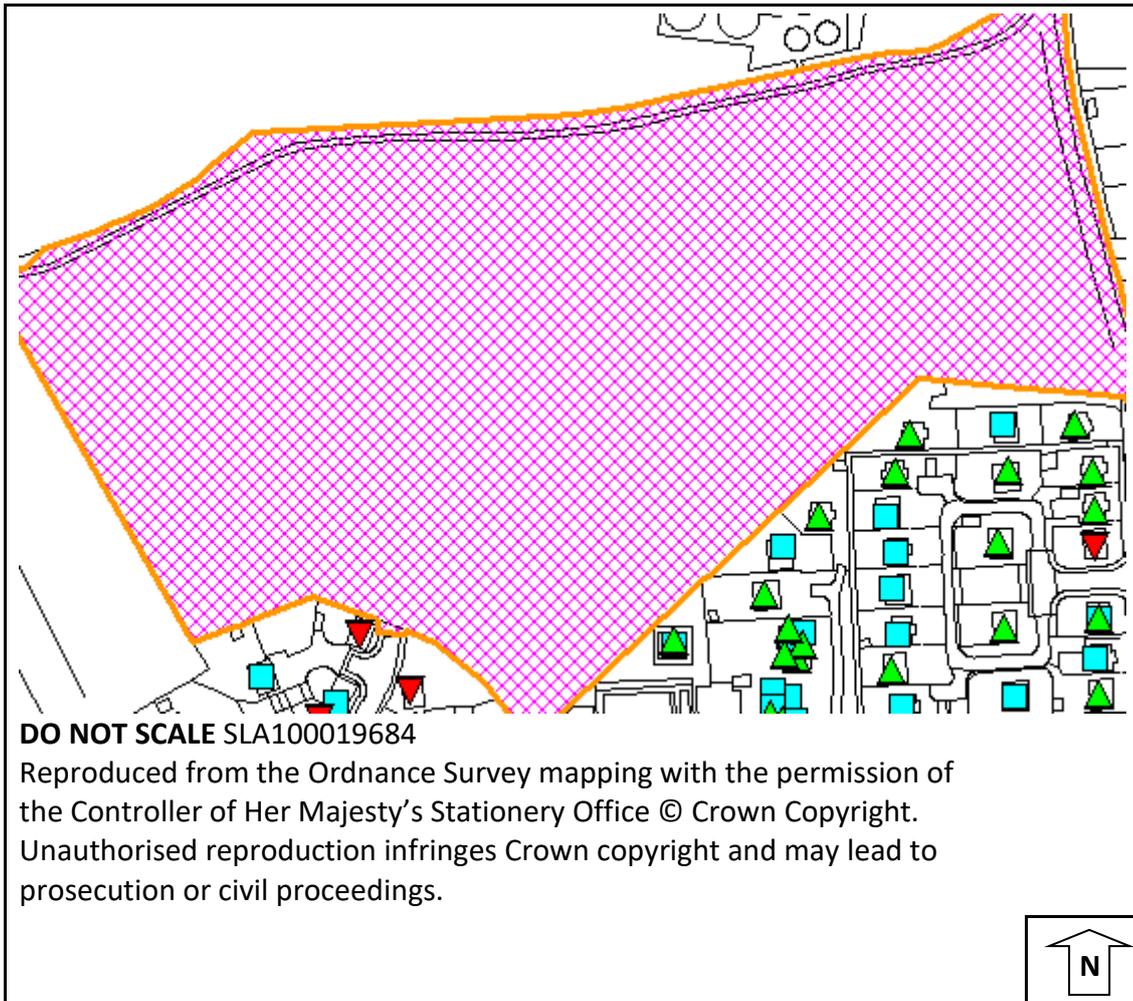
28. Prior to the commencement of any development in phase 1 a Construction Method/Management Statement shall be submitted to and approved in writing by the Local Planning Authority. This shall also be submitted prior to the commencement of phase 2 and phase 3. The Statement shall provide for:

- a) The parking of vehicles of site operatives and visitors;
- b) Loading and unloading of plant and materials;
- c) Construction methods and piling techniques.
- d) Storage of plant and materials used in constructing the development;
- e) Programme of works (including measures for traffic management and operating hours);
- g) Details of HGV delivery and collection vehicle routes and times to and from the site during construction phase. The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.
- h) The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
- i) Site security and public safety measures;
- j) Wheel washing facilities to prevent mud and sand from vehicles leaving the site during construction;
- k) Measures to control the emission of dust and dirt during construction;
- l) A scheme for recycling/disposing of waste resulting from construction works;

## **Background information**

See application reference DC/20/5278/FUL on [Public Access](#)

## Map



### Key

-  Notified, no comments received
-  Objection
-  Representation
-  Support