



## NORTH PLANNING COMMITTEE - UPDATE SHEET

19 May 2020

**Item 6 – DC/19/4368/FUL – Change of access arrangements to the entrance to Gunton Park at Rugby Club House, Old Lane, Corton**

### Clarification of removal of garage

The report states that the garage at No.10 Gunton Park Mews is to be removed, however this is incorrect, and the garage is to be retained. Sufficient land was granted to the rugby club by No.10 to facilitate the changes without the removal of the garage or associated boundary wall and the retention of the garage will not prejudice the delivery of the improved access.

**Item 7 – DC/18/4429/ARM– Approval of Reserved Matters of DC/14/4193/OUT - Outline Application with all matters reserved apart from access for up to 150 new dwellings (including affordable housing), associated infrastructure, open space and up to 3ha of employment land (comprising uses within use class B1 (including starter units) and use class B2) - Access, appearance, landscaping, layout and scale for the development of 150 dwellings (including affordable housing) at Part Land Surrounding Waveney Valley Pool, St Johns Road, Bungay, Suffolk, NR35 1PH**

### Additional information from applicant:

Since the application was previously discussed by the Planning Advisory Panel the applicant has provide the following additional information:

- Drawing no. CMP01 – Construction Management Plan, providing details of a secondary construction access/haul road and details relating to the accompanying Traffic Management Plan.

This information is acceptable subject to the final agreement of specification of the access and location of wheel washing facilities and construction operatives parking through planning condition.

### Comments from the chair of the Bungay Neighbourhood Development Planning Group (BNDPG):

In my capacity as Chair of the Bungay Neighbourhood Development Planning Group (BNDPG), I wrote regarding the above applications on the 17<sup>th</sup> April 2020 (**copy attached**). The letter identified several points of concern for the BNDPG and the comments were sent to all members of the Planning Advisory Panel

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North Meeting. The planning Advisory Panel subsequently deferred the applications and this is the second deferment for these sites as requiring 'more information'. The above applications continue to exceed the time for the plans to be approved therefore we believe it is time to revisit these applications and we request a complete new set of plans, which are more suitable for our local needs. In making the former statement I also refer you to section 8.5 of the report to the planning committee i.e. 'the outline permission was granted on 4th March 2016 and required, by condition, that:

- a) Application for approval of any reserved matters must be made within three years of the date of this outline permission and then
- b) The development hereby permitted must be begun within either three years from the date of this outline permission or within two years from the final approval of the reserved matters, whichever is the later date.

Since writing to the planning committee in April I had an online meeting with Bungay Town Council and Philip Ridley. Our consultant has also been in contact with the agent representing the owner of the adjoining site to development area WLP5.2. During the on-line meeting I again stressed the BNDPG were in support of the extra dwellings planned for the future growth of Bungay. However, with the information provided on the planning portal and reinforced over these last two weeks we fail to see evidence of 'joined up thinking/planning' for total development of the overall area and hence Bungay in general.

The BNDPG not only support the above two developments but also the development of the adjoining site labelled 209 (First Draft Plan East Suffolk Appendix 5 land south of Mountbatten Road). Bungay has limited room for housing development and the current sketch masterplan for the referenced applications will lead to problems with future development to the adjoining land. The agent for this landowner has written to Bungay Town Council stating 'that a condition is attached to an reserved matters consent, or incorporated within a legal agreement, which requires that the land in question is made available to facilitate access to the wider allocation in the Local Plan as and when the development on that site comes forward'. The BNDPG fully support this view. We have discussed inclusion of 209 (agreed with the landowner) into the Bungay Neighbourhood Plan with East Suffolk planning department.

The flood assessment for site WLP 5.2 has only considered the initial 150 homes not the eventual planned 400 homes. Suffolk County Council have lodged a holding objection because they have concerns over the conclusions made in the flood assessment. We have not seen a response from the developer to overcome this holding objection.

We understand Planning law requires applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.)

Many matters may be considered as material considerations, and we argue that the AECOM HNA report, requested by Bungay Town Council, is an up-to-date body of evidence on the housing need and mix for Bungay, produced by a government-appointed specialist and independent consultants. The very late inclusion of a projected housing mix from the developer is at odds with the report from AECOM. The BNDPG is repeatedly told our report has not been publicly scrutinized, but whilst our report is written by an informed public body who assessed the housing need for Bungay we are unable to find evidence of the housing mix identified by the developer. The AECOM report concludes Bungay needs a housing mix which contains less than 1% of new 4 bedroomed properties.

In conclusion whilst in agreement with the development of the site we are disappointed that both the developer and the planners chose not to recognise the requirements of growth for Bungay.

#### **Letter from 17<sup>th</sup> April from BNDPG**

In my capacity as Chair of the Bungay Neighbourhood Development Planning Group (BNDPG) I have been asked to respond to the referenced planning applications. We were only alerted to your meeting to discuss the above planning application over the Easter weekend. The BNDPG still have reservations to the two mentioned planning applications and would have expected more time to consider the revised documentation.

However, the BNDPG wish to emphasise that we fully support appropriate housing and commercial development on site 5.2 to ensure the long-term sustainability of the local economy. We reinforce the need for all proposed development to be consistent with the National and Local Plan policy. We have the following general comments to the above applications you will be considering on the 21<sup>st</sup> April.

We note a masterplan for site 5.2 has been produced but you state it is not binding. If the decision is reached by the committee that the application should proceed we request it must be on the understanding that a binding masterplan is produced before the commencement of any work on the site. This masterplan would be subject to consultation with the residents of Bungay as required by the Examiner.

Another general point is three times you mention 'this policy was not in place at the time that outline planning permission was granted it is not considered reasonable to impose a condition....'. We are of the view that if there are better known practices, technologies and indications of future trends then they should be applied to the development of the site e.g. heating only by heat pumps.

We make the following specific points which should be considered as conditions for the planned development.

#### **Access**

Provision to be made for a pedestrian crossing to safely access the swimming pool and gymnasium complex.

It should be expected the planned vehicular access to the A144 from the site will be busy. We suggest to either have a different entrance and exit from the A144 to the site and/or have an access through the King's Road development. This negates the need for all vehicles having to access the A144 from a single point.

The layout diagram of the site has not adequately addressed earlier concerns of poor access for service/waste vehicles, no details of 'bus connectivity for the site and limited property parking for cars, which may lead to irresponsible street parking.

#### **Layout/Landscape**

The proposed open spaces and some amenity sites are too small. There is no indication of any tree planting along the streets. We recommend appropriately sized trees are planted.

We believe the acoustic fence around the swimming pool will be inadequate at the southern end for plots 25 and 26 owing to the closeness to the mechanical services unit of the swimming pool. If the builder is not prepared to make provision for appropriate fencing a statement needs to be made stating any noise complaints will be quickly remedied by the developer.

## Sustainable construction

I refer to our earlier comment regarding your statement. The impact of climate change is with us and future building needs to take account of this phenomenon. However, we are pleased to see the removal of the gas main from the plan as this will mean the use of non-gas heating systems. We would expect a sustainability statement under WLP8.28 for this site.

## Lifetime design

Same argument as before; it is not acceptable to agree to a design, which mirror out-of-date practices. It is becoming good practice to provide building design, which allows for greater social interaction of residents and this should be applied to this development. With reference to WLP8.31 the current plan fails to provide detail of how 40% of dwellings meet Requirement M4(2) of Part M of the Building Regulations for accessible and adaptable dwellings and how homes support the needs of older people and those with dementia through creating familiar, legible, distinctive, accessible, comfortable and safe environments.

*With reference to WLP8.1 – ‘The mix of sizes and types of units on any particular site should be based on evidence of local needs including the Strategic Housing Market Assessment and in consultation with the local planning authority. Proposals for new residential developments will only be permitted where at least 35% of new dwellings on the site are 1 or 2 bedroom properties, unless this can be satisfactorily demonstrated to be unfeasible. Neighbourhood Plans can set out a more detailed approach to housing type and mix which reflects local circumstances and is supported by evidence.*

In response the BNDPG commissioned AECOM to carry out an in depth Housing Needs Assessment for Bungay (submitted to ESC March 2019). In the report recommendations it states, *‘In order to avoid misalignment between supply and demand and to re-equilibrate the stock over the plan period, we recommend that 12% of houses in new developments be one-bedroomed homes, 36% two bedroom, and 51% three bedroom.*

*Most of the community’s need will be for two or three-bedroom homes and **there will be no need to build further large properties with four or five bedrooms.*** Should approval be given, we wish a condition be applied to the plan in order that housing mix is informed by this report and simultaneously enable it to achieve compliance with WLP8.1.

We are glad to see that a condition regarding car electric charging points has now been included although clarity is required on who is responsible for road maintenance beyond the main thoroughfare routes.

## Appearance

The majority of properties in Bungay are built using facing brick and there are few rendered properties. It is inappropriate to build properties with rendered exteriors as there will be on-going maintenance for the occupier i.e. they are not designed for life. The report’s assertion that *‘The design of the dwellings themselves relate well to vernacular buildings that can be found in Bungay..’* we refute entirely. Currently the plan indicates that it will ‘just be another generic anywhere housing estate’. We require something distinctive and related to the character of the town echoed in the building design to draw people to live in Bungay. This was the purpose of commissioning The AECOM design report which analysed the character and special qualities of the town and provided guidelines that particularly references new housing development. This report was shared with ESC planners in March 2019 and we are dismayed that this document appears to have been ignored. We wish the recommendations within the AECOM report to be incorporated as a condition, to any planning approval.

**Drainage**

The submitted plans for the attenuation pond(s) do not indicate which drainage basin is preferable. Our understanding from the information provided by the report shows the size is inadequate and does not comply with Environment Agency's guidelines. Whichever, of the proposed basins are used it will not be large enough for the total development of the site. A new attenuation pond design is a prerequisite before the start of any development.

In conclusion whilst in agreement with the development of the site we are disappointed that all the recommendations made at the last ESDC planning committee have not been addressed. Of greater concern is that we end with an ad hoc housing development for the total site because the first part of the development is rushed through.