



**NORTH PLANNING COMMITTEE - UPDATE SHEET**

**10 March 2020**

**Item 5 – DC/19/1141/OUT – Outline Application – Development of up to 220 dwellings with associated open space on Land to the West of Copperwheat Avenue, Reydon, Suffolk, IP18 6YD.**

**Further Responses to Publication/Consultation**

Reydon Parish Council (received 08 March 2020):

- *“The Parish Council (PC) supports the case for applying the Principal Residence policy from our emerging Neighbourhood Plan (NP) which we do not consider is at an early stage as Reg 16 is the last stage before the Examination and Referendum.*
- *All the evidence presented to the PC, including the survey responses for the NP, show great concern among the community about the scale of this development. As a PC, however, we have accepted that more housing is needed both locally and, generally, in the district and that Reydon should take its share.*
- *However, we are concerned that this housing should meet our local needs – hence the Principal Residence requirement policy in our draft NP. This reflects a rise in second homes in Reydon to 25-30% (up from 7% in 2002) which is distorting the local housing market and pricing local people out of the market. This will be a continued pressure as the proportion of second homes in Southwold has now reached 60%.*
- *We therefore urge the Committee to apply the draft NP policy on Principal Residence Requirement as a condition of this application. (attached below). Without this condition, as many as 40 of the market houses will become second homes and more over time. These houses will not contribute to the Local Plan’s targets which are aimed at meeting the assessed housing needs of our resident population. This undermines the case for building in the AONB which is based on the assessed local need for housing.*
- *Alternatively, it could delay its decision until the outcome of the Examination of the NP. This would be a similar approach to that taken by the County Council in considering a planning application for a gravel pit in Reydon which has been deferred until the Mineral Local Plan is adopted.*
- *The NP also seeks to limit the forms of tenure of affordable housing to that of affordable rent and shared ownership only to ensure that the affordable housing can be retained in the long term. The affordable housing condition in this application is in line with current policy so that 25% will be shared equity. We believe it is possible to ensure that such housing remains available as shared equity in the long term by a planning condition and/or a covenant. We ask the Committee to place such a condition on the shared equity housing.*
- *More broadly, our draft NP seeks to ensure safe access to and from new developments, improved provision for walking and cycling to the countryside and to key locations in the village and in Southwold, good landscaping within developments and a sympathetic interface with the countryside. Absolutely*

LEGAL ADDRESS East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT  
DX: 41400 Woodbridge

POSTAL ADDRESS Riverside, 4 Canning Road, Lowestoft NR33 0EQ  
DX: 41220 Lowestoft

essentially, we need adequate sewerage provision given current problems in areas of Reydon close to this major development site.

- As part of the sewerage provision, Anglia Water have proposed an attenuation tank under the nearby Jubilee Green in order to make the flow into the current system manageable. This system is already under strain and regularly backs up and sometimes floods. We are concerned that attenuation may not be an adequate solution. In addition, we do not believe that Jubilee Green, which has just been developed in a way that meets local need, should be disrupted. We, therefore ask the Committee to require that all the necessary additional sewerage infrastructure is provided within the development site and that the developer is required to contribute to improvements to the existing infrastructure adjacent to the site.
- All the other elements of infrastructure requirements and design principles in our draft NP have been addressed by the work of the Planning Officers in the Parameter plans etc.
- Therefore, if the Committee is minded to approve this application, we ask the Committee to satisfy itself that the conditions ensure that the subsequent application for Full Planning Permission (ie to deal with reserved matters) is required to comply in full to the spirit and detail of these plans.
- We ask you to set maximum possible requirements for these aspects of the scheme and also to require adequate funding (CIL and/or S106 or equivalent) for safe access, traffic calming, walking and cycling improvements from the site to key places etc.
- Finally, we also ask that you ensure the edge landscaping is undertaken in full at or prior the commencement of work so that it has time to establish before building is complete and that the construction plans mitigate the serious effects that will be felt by those living on the access roads in particular.

**Draft Reydon Neighbourhood Plan (Reg 16 stage) Policy RNP 4: Principal Residence Requirement:**

*Due to the impact on the local housing market of the continued uncontrolled growth of dwellings used for holiday accommodation (as second or holiday homes) new open market housing, excluding replacement dwellings, will be supported only where there is a restriction to ensure its occupancy as a Principal Residence. Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement. New unrestricted second homes will not be supported at any time.*

***Principal Residences are defined as those occupied as the residents' sole or main residence, where the residents spend the majority of their time when not working away from home. The condition on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them. Occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or condition and be obliged to provide this proof if/when East Suffolk Council requests this information.***

***Proof of Principal residence is via verifiable evidence which could include, for example (but not limited to), residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc).***

*Reydon Parish Council asks the ESC Planning Committee to apply the bold section of the draft NP Policy to the market housing in the development proposed for the land west of Copperwheat Avenue."*

CLlr David Beavan (comments received 03 March 2020):

*"I know we get a lot of paperwork, but please bear with me.*

*The Copperwheat development plan for Reydon comes up next Tuesday. There is great concern in my ward that this will negate our neighbourhood plan that goes to referendum this year. We are fighting the tide of second homes which we fear will destroy our communities.*

*I was initially in favour of this project, agreeing with the Local Plan that we need to sacrifice some countryside to build "houses for local people". I was falsely reassured that the developers would not sell to second homeowners – following the generosity and community spirit of two other local landowners at Duncans Place and Green Lane. Unfortunately this is not now the case, and the landowners are not prepared to limit their selling price by restricting the sales.*

*I therefore argue that this application is premature in relation to the Reydon Neighbourhood Plan, specifically its residency clause which says that new builds must be for residents only.*

#### *National Planning Policy Framework*

*Paragraph 48 says, "Local planning authorities may give weight to relevant policies in emerging plans according to:*

*a) the stage of preparation of the emerging plan"*

*The Reydon Neighbourhood Plan is in regulation 16 consultation with ESC now.*

*The officers describe the plan as "at a very early stage" in section 7.2 on the agenda. I disagree. A steering committee started converting the Village Plan more than two years ago. Since then there have been drop ins, a full village survey and reg 14 public consultation on the pre-submission draft. The final plan has now been submitted and is open for representations to ESC until April 9th, when it goes to the examiner and then a referendum this year.*

*Philip O'Hear of Reydon PC agrees with me, "I agree completely. In fact all those being consulted at Reg 16 were consulted at Reg 14 stage and changes made to reflect their advice. It would be very surprising if Reg 16 throws up any need for significant change. At every stage RPC has worked with WDC/ESC Planning Policy Team and much of the wording of the proposed RNP Policies reflects their advice, including the use of the St Ives wording in the Principal Residence policy.*

*We believe RNP is both robust and sound, that it reflects the clear wishes of the community and is a good example of localism at work, and it will be approved at the Examination and endorsed in the referendum."*

#### *National Planning Policy Framework (cont. par 48)*

*b) "the extent to which there are unresolved objections to relevant policies "*

*The survey returned 95% support for the residency clause despite the sample including 12% non-residents.*

*Para 49 goes on to describe when an application may be refused on grounds of prematurity*

*"a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan;" These 220 homes are to meet the need*

for local homes until 2036. So for the whole period of the neighbourhood plan 2019 to 2036, the residence clause will not apply.

Para 50 states another precondition “permission for the development concerned would prejudice the outcome of the plan-making process.” The residency clause would become inoperable.

#### *Reydon Neighbourhood Plan*

Second homes have doubled in Reydon to 30% since 2010, catching up with Southwold’s 60%. In the last year alone the number of holiday lets registered as businesses has increased from 42 to 54.

#### *P5 “3.6 THE NEED FOR A NEIGHBOURHOOD PLAN*

*“The popularity of Southwold as a holiday and retirement destination has put pressure on Reydon. Southwold, because of its location and geography, cannot expand. But the proximity of Reydon to Southwold encourages tourists and retirees to look to Reydon to satisfy their need for holiday lets and second homes. This is pricing local residents out of the market and putting at risk the current vibrant community. A neighbourhood plan is needed to control these pressures and to plan for sustainable growth.”*

*P7 “In 2018, only five houses in Reydon (out of 40) were sold for under £200,000. The commercial housing market, therefore, is increasingly beyond the reach of many with a strong local connection but with only a modest income.”*

*In both recent Reydon market housing developments at St George’s and Shearwater Way, houses are on the market for £400k and 50% are second homes.*

#### *Policy RNP 3: Principal Residence Requirement:*

*“Due to the impact on the local housing market of the continued uncontrolled growth of dwellings used for holiday accommodation (as second or holiday homes) new open market housing, excluding replacement dwellings, will be supported only where there is a restriction to ensure its occupancy as a Principal Residence.”*

*The central purpose of the neighbourhood plan is to restrict new holiday lets and second homes. Allowing this development to pre-empt the residency clause will defeat this central purpose as the residency clause will not apply, The reduced density will also lead to more four bedroom houses in a rural setting designed for the £500k plus second home market.*

#### *Waveney Local plan WLP6.1*

*“The main strategy for Southwold and Reydon is to allocate more housing to increase the range of affordable homes in the area whilst protecting the sensitive built, historic and natural environment... Reydon has limited scope to expand as it is within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty.” p132*

*These 220 homes with existing commitments will provide for housing need to 2036.*

*“6.9 There is a high number second homes within Southwold and Reydon. One of the key objectives behind this allocation is to increase the provision of housing and in particular affordable housing to allow more people who work in the area to live in the area. “*

*The purpose of the Waveney Plan is to supply enough housing for future local needs. If the houses go to second homeowners, local need will not be satisfied. More AONB countryside will have to be sacrificed for the second homers. Where will it end?*

*Second home buyers push market prices above what local people can afford. The house price to earnings ratio is 15 to 1 in Reydon. Ironically this development will make affordable housing at 80% market value less affordable.*

#### *Rendlesham 2014 Precedent*

*There is a precedent where Suffolk Coastal did not give planning to a development because of an emerging Neighbourhood Plan. An application to build houses on a site that the emerging neighbourhood plan wanted to keep for the community was rejected on appeal in November 2014.*

*“This is the second formal stage of the NP making process. The pre-submission draft plan is therefore a material consideration for planning applications”- officers report to SCDC planning committee 20th August 2014 from SCDC statement of case to the appeal on C/12/2408.*

*The inspector said that the emerging Neighbourhood Plan, which was at an earlier stage than Reydon’s, passed all tests of being substantial, prejudicial to the NP and at an advanced stage.*

*Par 122 he concludes “As a result, the proposal is premature to the emerging RNP ...These matters attract significant weight against the proposal”*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/407485/Angel\\_Theatre\\_Suffolk\\_2218507.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/407485/Angel_Theatre_Suffolk_2218507.pdf)

#### *Conclusion*

*I welcome that there will 88 affordable homes in this development, but this is not enough for 16 years growth and I do wonder if viability issues may be raised further down the line. People are angry that we are sacrificing our countryside to build houses that will not be lived in – and what does that do for our climate change emergency?*

*Surely, we should respect the wishes of local people clearly expressed through their neighbourhood plan, otherwise we are fomenting a divided society, and eventually a loss of our community.*

*I am happy to answer any queries – davidbeavan@live.com.*

*Thank you for reading this,*

*Yours*

*Cllr David Beavan, ward member”*

### Natural England (received 26 February 2020):

Natural England (NE) advises that further information is required to determine the recreational disturbance impacts of this development. This has been submitted by the applicant and officers will continue to liaise with NE, pursuant to the recommendation in the committee report to secure NE agreement to the proposed development and conclusions of the Habitat Regulations Assessment: Appropriate Assessment prior to any grant of planning permission.

### Third Party Representations

Further letters of objection have been submitted by a local resident, the Southwold and Reydon Society (SRS), and Reydon Action Group for the Environment (RAGE). The full comments are viewable on the planning applications public access page; however, the key concerns raised (inter alia) are summarised as follows:

- Neighbourhood Plan (NP) Concern about the scale of this development as well as incursion into the AONB.
- NP consultation identified very strong concern about the impact of the increasing proportion of second homes in Reydon.
- SRS recommend refusal of this application unless a condition can be set to require that all the market housing on this development should be occupied as principal residences. If this is not possible, the application as it stands should be rejected, or deferred until the NP is adopted.
- SRS object to the application being for a bigger site than that allocated in the Waveney Local Plan (WLP). SRS are concerned that this would provide a lower density of housing and too many executive style homes.
- That said, SRS, along with the PC and NP Steering group, recognise that, as set out in the application, the larger site allows for the kind of landscaping within and in the edge of the site called for in the NP.
- Construction which will have a huge impact on the immediate neighbours, very strict conditions are needed.
- The proposed upgrade of footpath 2 to a bridleway required by SCC may not be deliverable and/or effective.
- The SCC requested conditions refers to the upgrading to a bridleway of Footpath 2 *within the site*; however, the proposed conditions in the Committee Report differ from those requested by SCC.
- The plans show the footpath is outside the application site, and therefore its upgrade cannot be relied upon unless it relates only the central section within the site.
- SCC recommended condition requires bridleway upgrade before occupation of any dwelling; however recommended condition in committee report is prior to occupation of the 101<sup>st</sup> dwelling.
- Phasing of development will be dependent on market conditions therefore it could be some time before the bridleway upgrade is delivered.
- The Habitats Regulation Assessment undertaken by officers will need to be re-considered.

**Item 6 – DC/19/4450/FUL – Change of use from B1 (Office use) to C3 (dwelling house) including provision of a single storey rear extension at Hubbards Barn, Hubbards Hill, Peasenhall, Saxmundham, Suffolk, IP17 2LA**

The applicant is unable to attend planning committee and would like the following points to be considered in response to the content of the Committee Report prepared for presentation to the Committee (please see the planning public access page for full text of email and accompanying attachments):

- Do not agree with the introduction of policies that have allowed the conversion of totally inappropriate, albeit redundant agricultural buildings to dwellings.
- No need to advertise agricultural buildings to an alternative use, could the same apply to Hubbards Barn?
- Planning application was previously refused Ref: DC/17/3527/FUL, for a traditional agricultural cart lodge style building to be used for storage. If approved the necessary, space to allow V-M Orthotics to grow would have been achieved and would still be operating from Hubbards Barn.
- An application for change of use from business to holiday accommodation including a single storey rear extension was approved Ref: DC/19/0145/FUL (Copy on I@W). This was found not to be economically viable.
- Conversion to holiday accommodation would only provide part time work for one cleaner, and part time work for one maintenance person. The cleaning and maintenance would be carried out by members of the Vander-Molen family.
- Pre-Application Planning Advice, relating to the change of use B1 business to C3 residential class 0, part 3, the advice received, (copy on I@W), made no reference of the need to market Hubbards Barn for a period of 12 months.
- Marketed by Clarke and Simpson, Chartered Surveyors and Estate Agents, since April 2019 at £495,000. There has been very little interest. Recently offered to remove overage and reduce price to £470,000.
- Submission of a revised O-S site plan, 1:1250 scale to show a dramatic reduction in garden curtilage outlined in red, with the land that goes with Hubbards Barn outlined in blue, retained as grassland suitable for livestock grazing.
- RAMS payment was paid in relation to ref: DC/19/0145/FUL, it is assumed that this contribution can be transferred to a new planning permission, should Committee Members grant planning permission for change of use to a dwelling.