



Waldringfield Parish Council

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RE: Waldringfield Parish Council's response to:

Waldringfield Parish Council response to DC/24/2810/VOC - Variation of Condition No. 1 of DC/21/4002/ARM - the construction of 173 dwellings (including **80 affordable houses**) together with associated works, landscaping and infrastructure for Brightwell Lakes (Phase W1) - on DC/20/1234/VOC - to amend this condition to allow for changes to the layout and proposed house types to better accommodate a suitable mix of affordable housing. Land To The South And East Of Adastral Park, Martlesham, Suffolk

Dear Danielle:

WPC **OBJECTS STRONGLY** to this application for the following reasons.

Our main concern is the significant reduction in the provision of "affordable dwellings" within this phase.

The overall total of dwellings in the approved RMA (DC/21/4002/ARM) for the W1 parcel of land was 173, of which 80 would be "affordable" across the categories. The number of affordable housing was shown as being deliverable and was agreed on 24/02/2022 as per the recent response from ESC's Housing Enabling Officer.

Application DC/24/2810/VOC is not seeking to make "*changes to the layout and proposed house types to better accommodate a suitable mix of affordable housing*"

It seeks instead to increase the number of market homes from 92 to 130 by reducing the total number of affordable dwellings to just 43, a reduction of 46%. (although when you add the different categories it comes to 44 -(see drawing Partial site re-plan – Planning layout)

Of the 43/44 affordable dwellings, only 14 are to rent, compared to the original 40, a reduction of 65%. The remainder are listed variously as "shared ownership".

So this VOC is to significantly reduce the affordable housing provision and increase the number of market housing. It is not to allow for changes to the layout and proposed house types to better accommodate a suitable mix of affordable housing as stated in the application.

In addition to the numbers being inconsistent across the various documents (this might be explained if they have included the parcel W1A in some of their figures) the descriptions of the affordable housing categories are also inconsistent/contradictory across the application documents.

eg. 1) The Partial Site Replan Planning Layout 22277/RP/PL1 Rev C lists:

Market Housing	130
Affordable Rent	14
Shared Ownership	8
Shared ownership	22

eg. 2) The REPLAN – Housing Distribution Layout 22277/RP/HDL/01

PRIVATE HOUSING TOTAL – 128 no.

AFFORDABLE HOME – 43no.

eg. 3)The approved RMA (DC/21/4002/ARM) breakdown of affordable provision

Affordable Rent	40
Shared ownership	20
First Homes	20

In the April 2024 BLCF Taylor Wimpey provided a “W1 Replan – Reason Statement” which stated that based on discussions with “affordable housing providers” the re-plan was to reduce the provision of 1 bed “affordable” properties and increase the provision of the 2+ bed properties. There was no mention, neither written nor spoken, of an overall reduction in the affordable dwelling provision. The reasons given at the time seemed at odds with satisfying the identified local housing need - ie the number of local households on the ESC’s housing waiting list.

We note that this has not been included or referred to in the new application **DC/24/2810/VOC**, perhaps because it shows the RPs in a very bad light in relation to the more vulnerable on the housing waiting list.

In summary

WPC objects strongly to this application for the following reasons:

- The inconsistency in the housing numbers across the documents.
- The inconsistency of the affordable housing categories across the documents.
- The affordable housing numbers proposed in this VOC, when taken in isolation, do not comply with ESC’s SCLP5.10: Affordable Housing Policy, which requires that the overall provision of affordable housing across large developments is 33% and of those dwellings, 50% should be for affordable rent / social rent, 25% should be for shared ownership and 25% should be for discounted home ownership. It barely meets the requirement of 25%. Previous RMA/VOC applications have shown that it is not planned for the affordable homes provision to be distributed evenly the across all of the phases/parcels. Clearly phase W1 had been identified in DC/21/4002/ARM to include a higher allocation in order to balance the lower provision in the phases/parcels already approved and those still to come.
- We consider that there is a lack of evidence to justify the swingeing reduction of the affordable housing provision in phase W1, as this undermines the council’s obligation to satisfy local housing need, particularly in this time of crisis.
- We consider that the stated purpose of this VOC, namely, *“to allow for changes to the layout and proposed house types to better accommodate a suitable mix of affordable housing”* is

inaccurate as the VOC is blatantly seeking to significantly reduce the affordable housing provision and increase the number of market housing. The applicant offers no justification to make such changes. It does not offer any evidence to indicate that the original affordable provision is now unviable.

Jennifer Shone-Tribley, Clerk on behalf of the Waldringfield Parish Council