

## Kesgrave Neighbourhood Plan

# Summary of Representations

This document contains summaries of the representations made in response to the publication of the Submission Kesgrave Neighbourhood Plan which was held between 24<sup>th</sup> January and 6<sup>th</sup> March 2020. The full representations were submitted to the Examiner for consideration during the Examination of the Kesgrave Neighbourhood Plan. Full copies of the representations can be viewed on the following webpage:

<http://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/kesgrave-neighbourhood-plan/>

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Anglian Water	A number of changes have been made to the document since the pre submission consultation. However, none of the amended policies raises any issues for Anglian Water, who have no comments to make.
East Suffolk Council	<p>The Council notes that many of the comments it submitted to the Reg 14 consultation have been addressed and that the neighbourhood plan is in general conformity with the strategic policies of the Local Plan other than KE1. The Council is concerned that policy KE1 includes a blanket resistance to housing and annexes in gardens and that this will not help support the delivery of housing. Such opportunities are provided for by the Local Plan subject to certain criteria. Housing requirements are set out in the Local Plan are minimum requirements and neighbourhood plans are expected to enable sufficient housing development to take place. A criteria-based approach could help to bring the policy into general conformity with the relevant strategic policies.</p> <p>In addition, the neighbourhood plan refers to the settlement boundary, whereas the policies map refers to the physical limits. The policies map key does not refer to the non-designated heritage asset called the Cedarwood Walk Sculptures. Policy KE2 refers to the Local Centre, whereas it should refer to the District Centre.</p>
Environment Agency	A large part of the Kesgrave neighbourhood plan area is located over a principal aquifer and source protection zones. An additional policy could state that planning applications on land potentially contaminated by a previous use, or a previous use on neighbouring land, should be accompanied by sufficient information to meet

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	<p>NPPF requirements for dealing with contaminated land. This should take the form of a preliminary risk assessment and provide assurance that the risk is fully understood and can be addressed through appropriate measures.</p>
<p>Gladman</p>	<p>Reference is made to a number of paragraphs of the National Planning Policy Framework and the Planning Practice Guidance which expect Neighbourhood Plans to positively support growth. Neighbourhood Plans should conform to the strategic policy requirements of Local Plans. The Neighbourhood Plan should be flexible to ensure it is effective following the adoption of the new Suffolk Coastal Local Plan.</p> <p>Gladman acknowledges that some issues previously raised have been addressed through amendments to the neighbourhood plan. However, it is felt that some neighbourhood plan policies still do not reflect national planning policies or those in the Local Plan. The Kesgrave Neighbourhood Plan should be worded in a way that is flexible to consider changes in the emerging Suffolk Coastal Local Plan.</p> <p>KE1 – Gladman object to the use of settlement boundaries if these prevent development from coming forward. Use of settlement boundaries to restrict development on the edge of settlements is contrary to the NPPF and basic condition a). The policy should be modified to be more flexible.</p> <p>KE3 – Protection of the settlement identity and key landscape features are subjective, and the policy cannot be applied with confidence when deciding planning applications. The evidence base fails to indicate why the views should be protected. To be protected a view needs to have a physical attribute. This element of the policy should be deleted.</p> <p>Coalescence is a strategic issue. Prevention of settlement coalescence should only be retained as a policy if it prevents coalescence in a physical or functional sense. A balancing exercise is required to assess the loss of physical or functional separation against the benefits of the proposal.</p> <p>KE5 – Policies to protect open greenspace must meet national policy requirements. There is very little evidence about how each designation meets national policy criteria. Failure to provide robust</p>

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	<p>evidence puts the neighbourhood plan in conflict with national policy and basic condition a).</p> <p>KE7 – Policy goes over and above national requirements and should be reworded to accord with NPPF paragraph 197.</p>
<p>Grainger PLC (Turnberry)</p>	<p>Object to the Kesgrave Neighbourhood Plan on the following grounds.</p> <p>The Neighbourhood Plan fails to identify sites for housing the development that would meet the need for 20 dwellings identified in the emerging Suffolk Coastal Local Plan.</p> <p>Policy KE2 is illegal because it has not sought to identify, allocate and evaluate sites.</p> <p>A review of the neighbourhood plan is likely to be necessary because it ignores the need for new housing development.</p> <p>Policies KE1 and KE3 seek to restrict opportunities for new housing development. This is not positive planning and therefore is not in accordance with National Planning Policy Framework paragraph 11a.</p> <p>There are no special landscape characteristics that would justify protection of the surrounding countryside. The surrounding landscape does not have a strong relationship with the built-up area because of the strong linear character of the Longstrops. Land to the south of Longstrops is agricultural, not greenspace or landscaping. A report prepared by EDB, setting out why the evidence based does not meet the tests of the Planning Practice Guidance, has been attached to the full representation.</p> <p>Policy KE3 duplicates policies contained in the emerging Suffolk Coastal Local Plan. The Local Plan policies map already designates the settlement boundary and so there is no need for the neighbourhood plan to deal with issues of settlement coalescence. The neighbourhood plan is therefore in conflict with National Planning Policy Framework paragraph 16f. Land between other settlements surrounding Kesgrave is outside of the Kesgrave</p>

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	<p>Neighbourhood Plan area and therefore KE3 and its supporting evidence cannot be admitted.</p> <p>Grainger’s previous representation suggested additional wording for policy KE5 with regard to pruning of trees. It is noted that similar wording has been inserted into the text. However, there should also be text which permits the removal of trees to enable safe access onto the client’s site. Without this the policy is not positively prepared and is ambiguous. KE5 fails policy 16 of the NPPF in terms of being positively prepared and policies that clearly written and unambiguous. The Local Green Space should be cognisant of future housing need and the promotion of land south of Long Strops for housing.</p> <p>The wording regarding Foxhall Radio Station Non-Designated Heritage Asset should be amended to support development that would in turn finance the renovation of the site.</p>
Highways England	<p>Welcomes the promotion of sustainable development, provision of facilities, services and sustainable transport. However, the level of development proposed is small and remote from the strategic road network. Traffic impact is covered in the evidence base for Local plans in the surrounding area, including mitigation measures.</p>
Historic England	<p>Historic England does not wish to comment at this time and refers to comments submitted during the regulation 14 consultation. Further guidance about how to incorporate the historic environment into neighbourhood plans can be found via the following link:  <a href="https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/</a></p> <p>Please inform Historic England when the neighbourhood plan is made by East Suffolk Council.</p>
Martlesham Parish Council	<p>Martlesham Parish Council fully supports the plan.</p>
National Grid (Avison Young)	<p>National Grid has no electricity or gas transmission assets within the Kesgrave Neighbourhood Plan area.</p>
Natural England	<p>Natural England has no comments to make about the Kesgrave Neighbourhood Plan. Annex 1 of the response provides more information about neighbourhood planning and the conservation of the natural environment.</p>
Sport England	<p>Attention is drawn to the role of the planning system in the provision of sports facilities and promoting healthy lifestyles.</p>

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	<p>Neighbourhood planning groups should refer to the Local Plan evidence base regarding the provision of sports facilities. New housing generates increased demand for sports provision. The planning system has an important role to place in promoting healthy lifestyles.</p>
<p>Suffolk County Council</p>	<p>SCC welcome changes made to the plan in response to comments made at Reg 14 stage.</p> <p>Suffolk County Council’s comments relate to whether or not the Kesgrave Neighbourhood Plan meets the basic conditions for neighbourhood plans. Comments are made with reference to the Final Draft Suffolk Coastal Local Plan where the Inspector considers (so far) that there is not a need for major modifications.</p> <p>A new policy should be included to support the provision of extra care housing in response to an ageing population across the County.</p> <p>Policy KE9 should have regard to the Ipswich Strategic Plan Area Transport Mitigation Strategy, which outlines the likely impact of development. Wording should be amended to require improvements to the pedestrian and cycle network as part of the development process.</p> <p>Policy KE10 – Remove reference to shelters, waiting areas and timetables because this is already explained in the supporting text.</p> <p>Paragraph 8.1 – ‘...isa...’ should read ‘...is a...’</p>
<p>WO and PO Jolly and the Kesgrave Covenant Ltd (Howes Percival LLP)</p>	<p>WO and PO Jolly note differences between the draft Kesgrave Neighbourhood Plan and submission Kesgrave Neighbourhood Plan. However, the Kesgrave Neighbourhood Plan still fails to address earlier representations.</p> <p>Two fences, 1.5 metres apart, were erected along the edge of the Long Strops, separating it from private property. A hedgerow was planted in the space between the two fences. The area between the two fences should not be identified as Local Green Space. A Local Green Space designation will not protect the hedgerow, nor will it confer public access in the space between the two fences.</p> <p>The space between the two spaces is governed by a planning instrument, which provides sufficient protection for the local</p>

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	<p>community. The Kesgrave Neighbourhood Plan must make clear that the area between the two fences is not Local Green Space.</p> <p>Policy KE5 has been amended to remove reference to ‘small in scale (in terms of height and bulk)’. However, the requirement to ‘enhance’ the role or function of green space goes beyond the protection afforded to green belt. It is noted that the National Planning Policy Framework gives substantial weight to harm of the green belt but there is no requirement to enhance it.</p> <p>Attention is drawn to an earlier letter dated August 2019 and this has been attached to this representation.</p>