

Date: 18th August 2017
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Attn: Mr Conor Crowther
Planning Policy and Delivery Team
(Neighbourhood Plans)
East Suffolk House
Station Road
Melton
Woodbridge
IP12 1RT

Dear Martlesham Parish Council,

Submission consultation of the Martlesham Neighbourhood Plan

Thank you for consulting Suffolk County Council on the submission version of your neighbourhood plan.

The county council is not a plan making authority, except for minerals and waste. However, it is a fundamental part of the planning system being responsible for matters including:

- Archaeology
- Education
- Fire and Rescue
- Flooding
- Health and Wellbeing
- Libraries
- Minerals and Waste
- Natural Environment
- Rights of Way
- Transport

This response, as with all those comments which the County Council makes on emerging planning policies and allocations, will focus on matters relating to those services (and others).

As this is the submission version of the neighbourhood plan any matters raised will also be in relation to the basic conditions a neighbourhood plan must meet in order to proceed to referendum¹.

Suffolk County Council is supportive of the Martlesham Neighbourhood Plan vision and notes that this version of the Plan has addressed the issues raised by the County Council at the pre-submission consultation. However, a small number of matters remain the County Council wish to highlight.

¹ <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

Policy Mar13: Non-Designated Heritage Assets

The County Council is concerned it is unable to implement this policy to protect the heritage of Martlesham in the way the neighbourhood plan intends, as it is not in accordance with paragraph 135 of the National Planning Policy Framework, which states *'In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'*

It is not clear what evidence has been used in identifying the significance of the assets listed in Appendix 1, this evidence may be required in order to ensure the policy meets basic condition 'a', which states a neighbourhood plan must have *'regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).'*

This issue could be resolved by rewording the policy to be less strict, allowing for balanced judgement based on the scale of harm or loss and the significance of the asset to be made. However, by listing the assets it will aid decision makers in understanding assets of importance to the local community.

The inclusion of Gorseland Primary School in Appendix 1 is a concern to the County Council in its statutory responsibility as a provider of school places. Policy Mar13 may prevent the County Council making any changes to this school if the education needs of the local area were to change, which needs to be balanced against paragraph 72 of the NPPF. For this reason the policy does not contribute to sustainable development, meaning it does not meet basic condition 'd'. The suggestion to reword the policy as set out above would resolve this issue.

Highways

Figures 7.1 and 7.2 – Traffic flows

It is not clear what evidence has been used to prepare these diagrams – for example, where 'projected peak time traffic' is shown, it is not clear how this projection has been informed.

It is understood that these diagrams have been developed to identify the locations which are considered relevant for the consideration of the Adastral Park application. The County Council will assess the highways implications of the Adastral Park proposal based on evidence submitted as part of the application, and will scrutinise the quality of that evidence.

Policy MAR16: Parking Standards

The County Council welcomes the commitment to the adopted countywide guidance. However, it is not clear that the clause relating to permanent availability of garages/car port facilities is enforceable as, once dwellings are occupied, the use of garages for storage cannot be prevented. The Suffolk Guidance for Parking (2015) recognises this and, in section 4.1.1. notes that garages need to be large enough to accommodate a large car and some storage. Size requirements, which have to be met in order for the garage to count towards meeting parking needs, are set out. On this basis, it may be preferable to strike out the sentence beginning 'Parking provision can take the form' in order to make the policy more effective and enforceable.

Policy MAR17: Parking Provision at Martlesham Heath Retail Park and Business Park

As with Policy MAR16, support for the County Council's approach to parking standards is welcomed. The policy notes the relationship between new proposals and existing parking provision. This is understood to mean that development proposals should consider whether any spare car parking capacity exists. The policy could not be used to require that proposals remedy existing problems as it is an established principle of planning that new developments cannot be required to remedy existing infrastructure deficits.

Please contact me via the details at the top of this letter if you would like to discuss any of the matters raised.

Yours sincerely,

Cameron Clow
Planning Officer
Resource Management