

MARTLESHAM NEIGHBOURHOOD PLAN

Submission Draft Version

**A report to Suffolk Coastal District Council
into the examination of the
Martlesham Neighbourhood Plan
by Independent Examiner, Rosemary Kidd**

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5 March 2018

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1.0 Summary

- 1.1 The Martlesham Neighbourhood Plan has been prepared to set out the community's wishes for the parish of Martlesham to address, as far as possible, the challenges that face the community.
- 1.2 I have made a number of recommendations in this report in order to make the wording of the policies and their application clearer and to ensure that they meet the Basic Conditions. Section 7 of the report sets out a schedule of the recommended modifications.
- 1.3 The main recommendations concern:
 - The deletion of Policy MAR8 and the deletion of parts of Policies MAR4, MAR12, MAR16 and MAR17.
 - Comprehensive revisions to MAR13 and the schedule of non-designated heritage assets
 - Amendments to clarify the wording of policies to ensure that they are clear and unambiguous, that they are flexible and to correct errors.
 - Ensuring that the boundaries of areas referred to in policies are shown on the Policies Map or defined in the justification to the policy.
- 1.4 Subject to these modifications being made to the Neighbourhood Plan, I am able to confirm that I am satisfied that the Martlesham Neighbourhood Plan satisfies the Basic Conditions and that the Plan should proceed to referendum.

2.0 Introduction

- 2.1 Neighbourhood planning was introduced by the Localism Act 2011 which allows local communities to create the policies which will shape the places where they live and work. The Neighbourhood Plan provides the community with the opportunity to develop a vision to steer the planning of the future of the plan area, to prepare the policies and allocate land for development which will be used in the determination of planning applications in the plan area.
- 2.2 Neighbourhood development plans that are in general conformity with the strategic policies of the local development plan for the local area (and which together form the local development plan), and have appropriate regard to national policy, have statutory weight. Decision-makers are obliged to make decisions on planning applications for the area that are in line with the development plan which will include the neighbourhood development plan, unless material considerations indicate otherwise.
- 2.3 Neighbourhood Plans are developed by local people in the localities they understand and as a result each plan will have its own character. I have been appointed to examine whether the submitted Neighbourhood Plan meets the basic conditions and the other statutory requirements.

Legislative Background

- 2.4 I have been appointed by Suffolk Coastal District Council with the consent of Martlesham Parish Council, to undertake the examination of the Neighbourhood Plan and prepare this report of the independent examination. I am independent of the Parish Council, the Neighbourhood Plan Steering Group and Suffolk Coastal District Council. I do not have any interest in any land that may be affected by the Neighbourhood Plan and I hold appropriate qualifications and have appropriate experience. My appointment has been facilitated by the Neighbourhood Planning Independent Examiners Referral Service.
- 2.5 As an Independent Examiner, I am required to determine, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, whether:
 - (a) the policies of the Neighbourhood Plan relate to the development and use of land for a designated neighbourhood area;
 - (b) the Neighbourhood Plan meets the requirements to: specify the period to which it has effect; not include provision about excluded development; and not relate to more than one neighbourhood area;
 - (c) the Neighbourhood Plan has been prepared for an area that has been properly designated for such plan preparation; and
 - (d) the Neighbourhood Plan has been prepared and submitted for examination by a qualifying body.

- 2.6 I am satisfied that the Neighbourhood Plan subject to the modifications proposed, includes policies that relate to the development and use of land and does not include provision for any excluded development. There are no other neighbourhood plans for the plan area.
- 2.7 The Neighbourhood Plan area is co-terminus with the parish of Martlesham with the exception of two areas. One in the north of the parish which was considered to be more appropriate for inclusion in the Woodbridge Neighbourhood Plan area, although Woodbridge Town Council has decided not to progress its Neighbourhood Plan. Secondly an area in the south of the parish covered by the Adastral Park strategic allocation. The area was designated by Suffolk Coastal District Council on 5 May 2015 as a Neighbourhood Area. Paragraphs 1.5 – 1.10 of the Basic Conditions Statement confirm these points.
- 2.8 Paragraphs 1.1 of the Neighbourhood Plan and 1.8 of the Basic Conditions Statement state that the lifespan of the Neighbourhood Plan is to be from 2016 to 2031. It would be helpful to plan users to show the lifespan of the plan on the front cover.

Recommendation 1: Show the lifespan of the Plan on the front cover.

- 2.9 The neighbourhood plan making process has been led by Martlesham Parish Council which is a “qualifying body” under the Neighbourhood Planning legislation which entitles them to lead the plan making process. The Plan has been prepared by the Martlesham Neighbourhood Plan Group on behalf of Martlesham Parish Council.
- 2.10 I am satisfied therefore that the Martlesham Neighbourhood Plan satisfies all the requirements set out in paragraph 2.5 above.

Conformity with Basic Conditions

- 2.11 An Independent Examiner must consider whether a neighbourhood plan meets the “Basic Conditions”. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:
1. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 2. the making of the neighbourhood plan contributes to the achievement of sustainable development;
 3. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 4. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and

5. prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The following prescribed condition relates to Neighbourhood Plans:
- Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 (as amended) sets out a further basic condition in addition to those set out in the primary legislation. That the making of the neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007) (either alone or in combination with other plans or projects). (See Schedule 2 to the Neighbourhood Planning (General) Regulations 2012 (as amended)).

- 2.12 The role of an Independent Examiner of a neighbourhood plan is defined. I am not examining the test of soundness provided for in respect of examination of Local Plans. It is not within my role to examine or produce an alternative plan, or a potentially more sustainable plan. I have been appointed to examine whether the submitted Neighbourhood Plan meets the basic conditions and Convention rights, and the other statutory requirements.
- 2.13 A neighbourhood plan can be narrow or broad in scope. There is no requirement for a neighbourhood plan to be holistic, or to include policies dealing with particular land uses or development types, and there is no requirement for a neighbourhood plan to be formulated as, or perform the role of, a comprehensive local plan. The nature of neighbourhood plans varies according to local requirements.
- 2.14 It is not within my role to re-interpret, restructure, or re-write a plan to conform to a standard approach or terminology. Indeed it is important that neighbourhood plans are a reflection of thinking and aspiration within the local community. They should be a local product and have particular meaning and significance to people living and working in the area.
- 2.15 I have only recommended modifications to the Neighbourhood Plan (presented in bold type) where I consider they need to be made so that the plan meets the basic conditions and the other requirements I have identified.

Policy Background

- 2.16 The first basic condition is for the neighbourhood plan “to have regard to national policies and advice contained in guidance issued by the Secretary of State”. The requirement to determine whether it is appropriate that the plan is made includes the words “having regard to”. This is not the same as compliance, nor is it the same as part of the test of soundness provided for in respect of examinations of Local Plans which requires plans to be “consistent with national policy”.

- 2.17 The Planning Practice Guidance assists in understanding “appropriate”. In answer to the question “What does having regard to national policy mean?” the Guidance states a neighbourhood plan “must not constrain the delivery of important national policy objectives.”
- 2.18 The National Planning Policy Framework 2012 (NPPF) sets out the Government’s planning policies for England and how these are expected to be applied. The Planning Practice Guidance provides Government guidance on planning policy.
- 2.19 The third basic condition is for the neighbourhood plan as a whole to be in general conformity with the strategic policies contained in the Development Plan for the area. The Development Plan comprises the 2013 Suffolk Coastal Local Plan Core Strategy and Development Management Policies which were adopted on July 2013; the Site Allocations and Area Specific Policies Development Plan Document which was adopted by the Council on 26th January 2017. A number of saved policies from the Suffolk Coastal Local Plan (incorporating the First and Second Alterations) also remain as part of the Development Plan for Suffolk Coastal District. The Council has started work on a revised Local Plan although this is at an early stage with a consultation on Issues and Options in progress from August to October 2017.
- 2.20 Representations have been made that the housing requirement in the Local Plan is out of date. This is a matter that will be considered during the forthcoming Local Plan review and is not a matter for the Neighbourhood Plan. The Basic Condition requires that I consider whether the Neighbourhood Plan is in general conformity with the strategic policies of the development plan in force at the time of the examination. As the Local Plan review is at a very early stage, no details are available yet about the revised housing supply policies.
- 2.21 I have considered the Neighbourhood Plan as a whole and each policy in turn to assess whether they are in general conformity with the strategic policies of the adopted Development Plan.
- 2.22 I have also considered whether the Neighbourhood Plan would introduce policies and designations that may constitute blanket restrictions that may restrict future development in the area contrary to the Local Plan strategy. I have considered whether there is robust evidence to support any proposed designations that would introduce such restrictions.
- 2.23 The Basic Conditions Statement sets out an assessment of how the Neighbourhood Plan policies have had regard to national policy and how it is in general conformity with the strategic policies of the 2013 Suffolk Coastal Local Plan Core Strategy and Development Management Policies. Where appropriate I have also considered the strategic policies contained in the Site Allocations and Area Specific Policies Development Plan Document and the saved policies of the Local Plan.

- 2.24 I have considered the Neighbourhood Plan as a whole against the NPPF and PPG and the adopted strategic policies. Then I have considered each of the policies to ascertain whether there is any conflict between a particular policy and the NPPF or the strategic policies of the Development Plan. Where appropriate I have highlighted relevant policies and guidance when considering each policy of the Neighbourhood Plan. I have also considered the Basic Conditions Statement submitted alongside the Neighbourhood Plan.

EU obligations and human rights requirements

- 2.25 A neighbourhood plan must be compatible with European Union obligations as incorporated into UK law, in order to be legally compliant. Key directives relate to the Strategic Environmental Assessment Directive, the Environmental Impact Assessment Directive and the Habitats and Wild Birds Directives. A neighbourhood plan should also take account of the requirements to consider human rights.
- 2.26 A Sustainability Appraisal incorporating a Strategic Environmental Assessment (SEA) and a Habitats Regulations Assessment (HRA) was undertaken on the draft Neighbourhood Plan prior to submission. The SEA report concluded that:

“The policies and proposals in the plan are designed to help implement strategic policies in the Suffolk Coastal District Local Plan – Core Strategy and Development Management Policies (adopted July 2013) which has been subject to Environmental Assessment and Appropriate Assessment under the Habitats Regulations Assessment. The policies and proposals do not allocate new land for built development but update policies from an earlier local plan. The plan does not allocate land for housing which at the strategic level was determined to be likely to have the most significant environmental effect.

“It is considered by Suffolk Coastal District Council in consultation with the Environment Agency, Historic England and Natural England that the content of the plan is such that it will not be necessary to undertake SEA or HRA in order to ensure compliance with EU obligations.”

- 2.27 Suffolk Coastal District Council consulted with the statutory bodies Historic England, Natural England and the Environment Agency on the Screening Report for the SEA and HRA in December 2016 to January 2017.
- 2.32 The Basic Conditions Statement comments that *“The Neighbourhood Development Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act.”* However no assessment has been included in the report.
- 2.33 Article 1 of the First Protocol protects the right of everyone to the peaceful enjoyment of possessions. Although the Submission Plan includes policies that would restrict development rights to some extent, this does not have a greater impact than the general restrictions on development rights provided

for in national law, namely the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011.

- 2.34 Article 6 protects the right to a fair and public hearing before an independent tribunal in determination of an individual's rights and obligations. The process for Neighbourhood Plan production is fully compatible with this Article, allowing for extensive consultation on its proposals at various stages, and an independent examination process to consider representations received.
- 2.35 Article 14 provides that "*The enjoyment of the rights and freedoms set forth in ... [the] ... European Convention on Human Rights shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.*" In the Consultation Statement, the Qualifying Body has provided evidence on how the statutory and non-statutory consultations have been carried out and demonstrated that they were undertaken in such a way that all sections of the local community have been given the opportunity to express their views.
- 2.36 As far as I can ascertain, the policies of the plan and its preparation have taken account of the need to consider human rights. I consider that the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations and human rights requirements and therefore satisfies that Basic Condition.

Contributes to sustainable development

- 2.37 The Basic Conditions Statement has included an assessment of the contribution of the objectives and policies towards the three key principles to sustainable development: economic, social and environmental and commented on how the plan will contribute towards delivering sustainable development.
- 2.38 I am satisfied that the Martlesham Neighbourhood Plan will support the delivery of sustainable development and help to meet the social and economic development needs of the parish within the environmental context of the area.

The Neighbourhood Plan Preparation

- 2.39 I am required under The Localism Act 2011 to check the consultation process that has led to the production of the Plan. The requirements are set out in Regulation 14 in The Neighbourhood Planning (General) Regulations 2012.
- 2.40 The Consultation Statement sets out an overview of the consultation process that has been undertaken in the course of preparing the Neighbourhood Plan. The preparation of the Neighbourhood Plan commenced in March 2013 with a public meeting to enable residents to consider whether they wished to proceed with preparing a Neighbourhood Plan. The key stages of consultation were:

- 5 August 2013 – Visioning Workshop;
- 23 January, 29 March and 8 April 2014 - Open meetings in various locations in the plan area;
- September 2014 – household survey questionnaire circulated;
- November - December 2014 and August - September 2014 – Retail and business survey followed by meetings with agents. Meetings with BT and Police as major landowners;
- September 2015 - survey of young people and youth groups;
- 14 November 2016 to 31 January 2017 – consultation on pre-submission draft plan;
- 7 July 2017 to 18 August 2017 – consultation on submission draft plan;
- Extensive publicity was undertaken through the website, Facebook, posters, banner, letters to households, articles in the local magazine and press releases to the newspaper.

- 2.41 One representor has noted that they were not approached to take part in the formative discussions on the plan. However, they have made comments on the initial draft and submission plans. I am satisfied that they have had appropriate opportunities to comment on the plan.
- 2.42 I am satisfied that the pre-submission consultation and publicity has met the requirements of Regulations 14 and 15 in the Neighbourhood Planning (General) Regulations 2012.

The Examination Process

- 2.43 The presumption is that the Neighbourhood Plan will proceed by way of an examination of written evidence only. However the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or so that a person has a fair chance to put a case.
- 2.44 I have undertaken this examination by way of written representations. I have considered the representations received during the consultation on the Submission draft plan. I have presented a number of questions to the Qualifying Body and Local Planning Authority seeking further clarification and information in writing. I have undertaken an unaccompanied visit to the Plan area.
- 2.45 I have considered the Basic Conditions Statement and the Consultation Statement as well as the screening report for the Strategic Environmental Assessment and Habitats Regulations Assessment and other background evidence. In my assessment of the plan as a whole and each policy I have commented on how the plan and policy has had regard to national policies and advice and whether it is in general conformity with relevant strategic policies.
- 2.46 This report is the outcome of my examination of the Submission Draft Version of the Martlesham Neighbourhood Plan 2016 - 2031. I am required to give reasons for each of my recommendations and also provide a summary of my

main conclusions. My report makes recommendations based on my findings on whether the Plan meets the Basic Conditions and provided the Plan is modified as recommended, I am satisfied that it is appropriate for the Neighbourhood Plan to be made. Once the plan is approved by Suffolk Coastal District Council it may proceed to a referendum. If it receives the support of over 50% of those voting then the Plan will be made by Suffolk Coastal District Council.

2.47 Under the terms of the neighbourhood planning legislation I am required to make one of three possible recommendations:

- that the plan should proceed to referendum on the basis that it meets all the legal requirements;
- that the plan should proceed to referendum if modified; or
- that the plan should not proceed to referendum on the basis that it does not meet all the legal requirements.

2.48 If recommending that the Neighbourhood Plan is submitted to referendum my report must also recommend whether the area for the referendum should extend beyond the neighbourhood area to which the Neighbourhood Plan relates, and if to be extended, the nature of that extension. It is a requirement that my report must give reasons for each of its recommendations and contain a summary of its main findings.

3.0 Neighbourhood Plan – As a whole

- 3.1 In considering the policies contained in the Plan, I have been mindful of the guidance in the Planning Practice Guide (PPG) that:

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like.”

- 3.2 In order to ensure that a neighbourhood plan can be an effective tool for the decision maker, the PPG advises that

“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”

- 3.3 NPPF paragraph 183 states that parishes can use neighbourhood planning to set planning policies through neighbourhood plans to determine decisions on planning applications. The Planning Practice Guidance on Neighbourhood Plans states that neighbourhood plans should *“support the strategic development needs set out in the Local Plan”* and further states that *“the neighbourhood plan must address the development and use of land by setting planning policies to be used in determining planning applications because once the plan is made it will become part of the statutory development plan”*.

- 3.4 National planning advice in NPPF paragraphs 16 and 184 is that neighbourhood plans should support the strategic development needs set out in the Local Plan, plan positively to support local development and should not promote less development than set out in the Local Plan or undermine its strategic policies. Nor should it be used to constrain the delivery of a strategic site allocated for development in the Local Plan.

- 3.5 NPPF paragraph 55 states that *“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”*. The PPG adds the following guidance on rural housing *“all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence”*.

- 3.6 The Basic Conditions require that the Examiner considers whether the plan as a whole has had regard to national policies and advice contained in guidance issued by the Secretary of State and whether it is in general conformity with the strategic local policies. I now turn to considering whether

the policies in the plan taken together have had regard to national and local strategic planning policies.

- 3.7 The parish of Martlesham has a population of 5478 in 2011. The Neighbourhood Plan area is located to the south-west of Woodbridge and east of Ipswich. It contains residential areas with a district shopping centre, a business park and an out of town retail park. There are also areas of countryside with an Area of Outstanding Natural Beauty (AONB) and a special landscape area. The strategically important Adastral Park has been excluded from the Neighbourhood Plan area.
- 3.8 The Martlesham Neighbourhood Plan as a whole is thorough, clear and well presented. The Plan seeks to manage the change that will arise as a result of the strategic development proposals for major housing and employment development at Astradal Park and its impact on the existing community, its facilities and the local environment. The Plan contains policies that support the safeguarding and improvement of various community facilities and infrastructure.
- 3.9 The plan does not make provision for housing development apart from infill housing development. It sets out physical limits boundaries and seeks to safeguard some existing open spaces and gaps between the communities. Key policies in the plan set out guidance on the future development of the Martlesham Heath Business Park and Retail Area, Sandy Lane Business Estate and the Martlesham Heath District Centre.
- 3.10 A number of policies in the Plan have been derived from the saved policies from the old Suffolk Coastal Local Plan. I have concerns that some of these policies have been superseded by policies in the Site Allocations and Area Specific Policies DPD, are no longer applicable, are out of date or not clearly worded.
- 3.11 Certain policies state that planning permission will be granted for a particular type of development. The Neighbourhood Plan policies cannot indicate whether planning permission should be granted for a particular form of development. NPPF paragraph 2 states that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan consists of the Local Plan as well as the Neighbourhood Plan and there may be other matters that have to be considered before granting planning permission. Modifications are proposed to these policies to avoid this form of wording to take account of national policy.
- 3.12 A number of the criteria set requirements with the use of the word “must”. Unless the criterion sets out a requirement in all cases, some flexibility should be built into criteria by using the word “should”.
- 3.13 In order to help plan users and decision makers to reference the criteria in policies it would be helpful to number and/or letter the criteria rather than use bullet points.

- 3.14 The maps in the Plan are clear and there is a Policies Map which shows the boundaries of sites and areas referred to in the policies. Some of the policy numbers in the key are incorrect. The numbering of the figures in the text should also be checked and corrected.

Introductory Sections to the Neighbourhood Plan

- 3.15 The Introduction to the Neighbourhood Plan sets out the national and local strategic context clearly. Paragraph 1.1 should be updated to refer to the adopted Site Allocations and Area Specific Policies Development Plan Document and the commencement of the review of the Local Plan.
- 3.16 A representation has been made stating that reference should also be made to the “saved” policies. Paragraph 1.3 refers to the expectation that the Neighbourhood Plan will help implement the strategic policies of the Core Strategy and replace some of the “saved” policies of the earlier Suffolk Coastal Local Plan. The Neighbourhood Plan policies can only replace the saved policies as they apply to the Martlesham Neighbourhood Plan area. A recommendation is proposed to clarify this.
- 3.17 A representation has questioned the statement in paragraph 1.17 that the Core Strategy is up to date as there was a requirement to review Policy SP2 and the housing land supply position may change. As the Neighbourhood Plan will be in use for some time, I am recommending that the first sentence of paragraph 1.17 be revised to remove reference to the Core Strategy being up to date.
- 3.13 Chapter 2 sets out the historical context for Martlesham, a summary of key statistical data and describes the issues facing the parish today. A representation has been made seeking the removal of the words “and the units in the industrial park” from paragraph 2.15 and the addition of “small local services” in paragraph 2.17. As this is a description of the nature of the retail units in the area, I make no recommendation about the text.

Recommendation 2: revise the Introduction as follows:

Revise paragraph 1.1 to include reference to the “*adopted Site Allocations and Area Specific Policies Development Plan Document and “saved” policies*”.

Add the following at the end of paragraph 1.3 “*within the Martlesham Neighbourhood Plan area.*”

Delete “and, under the guidance provided by the NPPF, is up to date” from paragraph 1.17.

Reference the criteria in policies by numbers and/or letters rather than use bullet points.

Correct the policy numbers in the Policies Map key. Correct the numbers of the figures.

The Neighbourhood Plan's Vision and Objectives for Martlesham

- 3.14 The vision of the plan sets out the aim that “*As Martlesham evolves and grows it will preserve the best of what already exists and harmoniously incorporate the new with the result that the whole will be better than the sum of its parts.*”
- 3.15 There are no objectives in the Plan although the vision includes five statements addressing housing mix, infrastructure, accommodation for employment, the natural and historic environment, safe walking, cycling and public transport links and building a strong community with support and facilities for all residents.
- 3.15 Paragraph 3.3 acknowledges that some aspects of the vision such as the provision of a wider range of housing will be dependent on developments in the strategic development site at Adastral Park which is outside the plan area.
- 3.16 Table 3.1 shows how each vision statement is to be addressed through various types of development and input by the community and Parish Council activities including input into the Masterplan for Adastral Park. However no assessment has been undertaken to show how the vision statements will be delivered through the policies of the Neighbourhood Plan. It is recommended therefore that Table 3.1 is revised to make this explicit.

Recommendation 3: revise Table 3.1 to demonstrate how the vision statements are to be delivered through the policies of the Neighbourhood Plan. Those vision statements that are not delivered through the plan policies should be deleted or revised.

4.0 Neighbourhood Plan – The Policies

Strategic Context for Development in Martlesham

- 4.1 Suffolk Coastal Local Plan sets out the settlement hierarchy in Policy SP19. This policy identifies the scale of housing, employment and retail development that is to be developed in each type of centre.
- 4.2 Martlesham lies within the area east of Ipswich which is classed as a Major Centre and is a sub-regional centre for commercial and social facilities. Martlesham village is classed as a key service centre.
- 4.3 Major allocations of large scale development to meet strategic needs are identified in the Core Strategy under Policy SP20 Eastern Ipswich Plan Area. This includes the parish of Martlesham. The development proposals are on sites mainly in the parish but outside the Neighbourhood Plan area and are to be addressed in detail by the Suffolk Coastal District Council Local Plan Review and the Adastral Park development. Significant proposals include the development of 2000 new homes to the south and east of Adastral Park, the designation of Adastral Park as a Strategic Employment Area, improvements to transport and community infrastructure, and environmental safeguarding.
- 4.4 Other Core Strategy policies include the identification of concentrations of employment uses as General Employment Areas. The potential for the expansion of the out of centre retail park and superstore at Martlesham Heath is considered to be limited due to impact on neighbouring retail centres particularly Woodbridge. The Core Strategy's emphasis is on protecting existing centres.
- 4.5 The introduction to the Neighbourhood Plan expresses the community's original aspiration for the Plan that it would be able to help shape the new developments and integrate them into the existing settlements. However the District Council determined that the area of the strategic allocation should be excluded from the Neighbourhood Plan and that the development proposals should be addressed through the Suffolk Coastal District Council Local Plan Review and the Adastral Park development.
- 4.6 The Neighbourhood Plan therefore addresses the future of the remainder of the parish excluding North Ward which was intended to be included in the Woodbridge Neighbourhood Plan. No housing allocations are proposed in the Plan as it is intended that the housing requirement is to be met through the strategic allocation.
- 4.7 Table 2 of the Site Allocations and Area Specific Policies Development Plan Document shows that in Martlesham 37 houses were completed between 1/4/2010 – 31/3/2015 and 170 houses had permission or were subject to a resolution to grant permission as at 31/3/2015. Giving a total of 207 dwellings in the parish outside the strategic development area.
- 4.8 Table 5.1 assesses the implications of planned growth for the Neighbourhood Plan. It concludes that in view of the strategic allocation, no further land is

required to be allocated for housing development. This conclusion is at odds with advice in the PPG which states that neighbourhood plans can allocate additional sites to those in the Local Plan. Alternative sites can boost housing supply, provide greater choice and help to meet particular needs identified in the plan area.

- 4.9 The Plan relies on providing additional housing through infill development. However no assessment of potential infill sites has been undertaken and no attempt has been made in the plan to quantify the number of dwellings that may be developed from this source over the lifetime of the plan.
- 4.10 A representation has been made on the Plan's approach to meeting housing need as set out in paragraphs 3.3, 5.5 and 9.2 and Tables 3.1 and 5.1. The representation highlights the strategy that Martlesham lies within an area that is a Major Centre that is expected to deliver a substantial proportion of the District's housing requirement. The representation comments that the Neighbourhood Plan is relying on the strategic allocation at Adastral Park and should have been proactive in finding suitable sites for housing within the plan area. The representor considers that the approach based on limited infill development is not a reasonable approach and will not help to boost housing supply in the area. Another representor suggests that sites on the Martlesham Heath Business Park are available and suitable for extra care / care home accommodation.
- 4.11 The PPG states that neighbourhood plans may allocate sites for housing development but are not obliged to do so. National planning guidance advises that all settlements can play a role in delivering sustainable development and blanket policies restricting housing development should be avoided unless their use can be supported by robust evidence. In my examination of the Martlesham Neighbourhood Plan I will consider whether those policies that restrict development accord with strategic policy and are supported by robust evidence.

Approach to Development

Policy MAR1: Physical Limits Boundaries

- 4.12 A review of the Physical Limits Boundaries around Martlesham has been undertaken as part of the preparation of the Neighbourhood Plan in accordance with Policies SP26, SP27 and SSP2 of the Local Plan. The main changes have been the inclusion of sites to the south and west of Martlesham village which have been developed or have the benefit of planning permission. The policy intends for any future development to be in the form of windfall development within the Physical Limits Boundary.
- 4.13 A representation has been made that opposes the use of Physical Limits Boundaries if these would preclude the delivery of otherwise sustainable growth opportunities from coming forward. I consider that the identification of

Physical Limits Boundaries accords with the strategic policy approach. I have no comments on the wording of the policy itself.

- 4.14 The Physical Limits Boundary shown on the Policies Map excludes the area of Deben Avenue. This area of housing is shown within the Physical Limits Boundary on Map 40 of the Site Allocations and Area Specific Policies DPD January 2017. Whilst the housing is part of the community of Kesgrave, it lies within the Martlesham Plan area. I can see no reason why the area should not be shown as within the Physical Limits Boundary of the Martlesham Neighbourhood Plan map.
- 4.15 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 4: Include the area of Deben Avenue within the Physical Limits Boundary on the Policies Map.

Add the following after paragraph 4.2: “*Although Deben Avenue is within the physical limits of Kesgrave (as shown in Map 40 in Appendix 6a of the Site Allocations and Area Specific Policies - Development Plan Document January 2017), it is within the Martlesham Neighbourhood Plan area*”.

Policy MAR2: Areas to be Protected from Development

- 4.16 Martlesham Heath is a planned community developed in the 1970s to 1980s. It contains areas of woodland, heath, greens and open spaces which are an essential part of its character. The justification to the policy explains the significance of the open spaces.
- 4.17 These areas were covered by Saved Local Plan Policy AP28 as Areas to be Protected from Development. This policy has been updated and included in the Site Allocations and Area Specific Policies Development Plan Document which was adopted in January 2017.
- 4.18 Representations have been made that the policy is overly restrictive, does not conform to national policy and the areas should be reviewed to provide opportunities for residential development.
- 4.19 The wording of Policy MAR2 is the same as that of the saved Policy AP28. The recently adopted Policy SSP39 includes a revised form of wording that has taken account of current national guidance. The areas included on the map are the same as those shown under saved Policy AP28. Martlesham parish is not shown on the maps for the Site Allocations Document as the area is covered by the Neighbourhood Plan. It is recommended that the policy wording should be revised to be consistent with that of Policy SSP39.

Recommendation 5: Revise Policy MAR2 to read:

“Areas to be protected from development, as identified on the Policies Map, comprise local scale sites, gaps, gardens and spaces that make an important contribution to the character and setting of Martlesham in their undeveloped form. Accordingly, development within these areas will be severely restricted.”

Delete reference to saved Policy AP28 from the justification.

Policy MAR3: Development within Martlesham Heath

- 4.20 The policy sets out matters to be considered in the location and design of windfall development within the built up areas of Martlesham Heath, including the Village Centre.
- 4.21 The policy refers in the first and second paragraph to “development will be expected to”; this should be rephrased to be more positive by the use of the word “should”.
- 4.22 It is considered that the wording of paragraph 4 which refers to the retention or re-provision of leisure uses in accordance with Policy MAR9 is unclear. Inclusion of the word “if” is not necessary. A recommendation is made to improve the clarity of this paragraph.
- 4.23 A representation has been made concerning the plan’s approach to health care facilities. Concern is expressed that Policy MAR3 would restrict development opportunities on land adjacent to the GP surgery at The Square pending a decision about whether the surgery should be expanded. The representor makes the point that there is scope to provide additional health care facilities at Adastral Park. The representor notes that the title of the photograph on page 23 is incorrect.
- 4.24 The Qualifying Body has informed me that discussions are still ongoing between the developer, the LPA, CCG, NHS England and the Practice. They have proposed revisions to the wording of the final paragraph of Policy MAR3 to refer to proposals not “*prejudicing the potential for expansion of the healthcare facility until it is clearly demonstrated that it is not necessary*”. They have also proposed a consequential revision to paragraph 4.20. I have recommended that the revised text be incorporated to update and improve the clarity of the policy.
- 4.25 In view of the recommendation to delete the section of the Plan on Access to Health Facilities, the Qualifying Body has asked that reference should be included in the text to the Non Policy Action in Table 9.1 of the Plan by the inclusion of the following text after paragraph 4.20: “*The Parish Council will continue to work with all relevant parties to try to ensure that any new surgery provision which serves all or part of the community in the Neighbourhood Plan Area complements rather than displaces the existing one, or in the event*”

that a new replacement health facility is required, that it is located as centrally as possible such that it has good sustainable access for all users including those who walk, cycle or use mobility scooters.” I agree that this additional text would provide a useful cross reference to the Non Policy Action following the deletion of the section on health facilities. The wording of the Non Policy Action in Table 9.1 should be revised to accord with it.

- 4.26 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 6: revise Policy MAR3 as follows:

Revise the first paragraph to read: “....*new development should be in keeping with*”

Revise paragraph 2 to read: “In particular, development *should be....*”

Revise paragraph 4 to read: “Any existing leisure uses on sites accessible to the public should be retained or re-provided in line with Policy MAR9.”

Replace the “; and” at the end of the third bullet point with a full stop.

Revise the last paragraph to read: “Any development proposals must demonstrate that they have engaged with the Clinical Commissioning Group in respect of the existing primary healthcare facility. Proposals shall not *prejudice* the potential for expansion of the existing healthcare *unless it is clearly demonstrated* that this is not necessary to support the growth proposed in the Neighbourhood Plan area and at the strategic site at Adastral Park during the plan period.”

Revise paragraph 4.20 to read: “*Any future planning decisions made in the village centre (as defined on the Policies Map) should take account of the demonstrated need for the future expansion of the healthcare facility.*”

Include the following text after paragraph 4.20: “*The Parish Council will continue to work with all relevant parties to try to ensure that any new surgery provision which serves all or part of the community in the Neighbourhood Plan Area complements rather than displaces the existing one, or in the event that a new replacement health facility is required, that it is located as centrally as possible such that it has good sustainable access for all users including those who walk, cycle or use mobility scooters.*”

Revise the wording in Table 9.1 on Non Policy Actions for Surgery Facilities to reflect the Parish Council’s aspirations as set out above.

Housing

Policy MAR4: Residential Design and Amenity

- 4.27 The policy sets out a number of design and amenity matters to be considered in the design of new housing that will be built on infill plots.
- 4.28 The second bullet point refers to development meeting Policy MAR2. This is already addressed in Policy MAR3 on the location of development and it is considered to be unnecessary when considering the design of a development.
- 4.29 The eighth bullet point promotes high quality interior spaces and light. The PPG advises that a neighbourhood plan should set out policies that will be used to determine planning applications. The design of internal spaces is not a matter that will be considered when assessing a planning application and it is therefore recommended that this criterion be deleted.
- 4.30 Most but not all of the bullet points finish with “and”. To ensure that all points are taken into account in using this policy, the correct form is to insert “and” at the end of the penultimate criterion.
- 4.31 A representation has been made concerning the statements in paragraph 5.3 reflecting the community’s views of supporting relatively low density development and the ability of the plan to deliver this form of development through infill sites.
- 4.32 I consider that paragraph 5.3 is a summary of the community’s views and Policy MAR4 includes general design statements that development should respond to local surroundings and does not prescribe any density.
- 4.33 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 7: Revise Policy MAR4 as follows:

Delete second and eighth bullet points.

Delete the word “and” from the end of bullet points except for the penultimate one.

Policy MAR5: Housing Needs

- 4.34 The first part of the policy seeks to address the need for smaller properties in the Plan area and goes on to state that the mix of house sizes should be as set out in the Core Strategy Policy SP3. Table 3.6 in the justification to Policy SP3 sets out the target proportions of house sizes for development of 5 or more dwellings and is the default position for developments throughout the District.

- 4.35 The second part of the policy seeks to provide for the significant majority of 2 and 3 bedroomed properties as bungalows, flats and sheltered accommodation. I have asked the Qualifying Body for their evidence to support the policy. They have provided me information from the residential survey, consultation with estate agents and census information on the size of properties (in terms of bedrooms) that is required.
- 4.35 There is likely to be a demand for a variety of house types and tenures to meet the future needs of young people and the ageing population, mainly of 2 and 3 bedrooms. However, I have concerns that the policy is unduly prescriptive in the type of housing that is to be sought. A more generic form of wording has been proposed by the Qualifying Body in response to my question on the subject. I have recommended that this revised wording be included.
- 4.37 A representation has been made that the housing needs will change over time and the policy should include reference to the latest housing needs assessment. I agree that housing needs surveys should be undertaken to provide evidence for any specialist types of housing, such as affordable housing, bungalows or extra care housing. I have recommended that a reference to future housing needs surveys being undertaken is added to the justification to provide evidence for any special types of housing. Reference in paragraphs 5.10 – 5.11 on sheltered housing and bungalows should consequently be deleted.
- 4.38 Table 5.1 is poorly presented and illegible. It should be redesigned. The background evidence report to support the residential mix should be published separately.
- 4.39 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 8: Revise Policy MAR5 to read:

“Residential developments should provide a mix of dwelling sizes and tenures, both market and affordable housing, that meet the requirements of Suffolk Coastal Core Strategy Policy SP3. In particular, this should provide two and three bedroom properties to meet the needs of older people looking to downsize and local people looking to remain in the area.”

Delete that second sentence of paragraph 5.10 and all of paragraph 5.11. Add the following to paragraph 5.10: “*Housing Needs Surveys will be undertaken in the future to determine the need in the plan area of any particular types, sizes and tenures of housing.*”

Redesign Figure 5.1.

Policy MAR6: Residential Boats

- 4.40 The first part of Policy MAR6 and the first four bullet points set out the circumstances where development affecting residential boats and associated jetties, platforms and sheds requires planning permission. This does not set out the policy approach to determining such planning applications and should be included in the justification for information purposes. The introduction to the second part of the policy which does set out the matters to be considered in determining the planning application should be amended as a consequence.
- 4.41 The punctuation of the final three bullet points should be corrected so that all points are taken into account in the consideration of planning applications.
- 4.42 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 9: revise Policy MAR6 as follows:

Place the first paragraph and the first four bullet points in the justification to Policy MAR6.

Revise the second paragraph to read:” The development of a *new mooring for a residential boat, alterations to or replacement of an existing residential boat or for the construction of jetties, platforms and sheds associated with residential boat moorings should demonstrate the following:*

Delete “that” from the first bullet point.

Replace the full stops in the first and second bullet point with semicolons and add “and” at the end of the second bullet point.

Recreation, Leisure, Services and Environment

Policy MAR7: Local Gaps

- 4.43 This policy seeks to protect the gaps between Martlesham Heath and Martlesham Village and the neighbourhood settlements to help retain the identity of the settlements. Three locations are indicated on the Policies Map.
- 4.44 The open land within the gap between Martlesham Heath and Kesgrave is covered by the areas to be protected under Policy MAR2. It is considered that further protection under Policy MAR7 is unnecessary and superfluous. However, reference to the protection of the area under another policy may be included in the justification for completeness.
- 4.45 Policy SP15 makes provision for the protection of “*sites, gaps, gardens and spaces that make an important contribution to a particular location in their*

undeveloped form....; or more generally avoided where development in these locations would lead to coalescence.” I consider that the identification of local gaps accords with this strategic policy.

- 4.46 A representation has been made that questions the purpose of the gap designations if this would prevent sustainable and deliverable housing sites coming forward.
- 4.47 The relatively small gap between Martlesham Heath and Martlesham Village consists of an area of woodland and heath which contains footpaths and appears to be a popular open area.
- 4.48 The gap between Martlesham Village and Woodbridge is an area of farm land with farmsteads and associated buildings. It is crossed by the railway line. The enhancement of the area has been encouraged through saved Policy AP214 as the area is part of the Fynn Valley and lies adjacent to the AONB and Special Landscape Area.
- 4.49 To improve the clarity of the policy it is recommended that reference should be made to the gaps being shown on the Policies Map. The delineation of the areas by arrows may result in some ambiguity for decision makers; it would be preferable for the boundary of the areas to be shown on the Policies Map. The Qualifying Body has provided me with a map showing the boundaries of the two areas to be covered by the policy.
- 4.50 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 10: Revise Policy MAR7 as follows:

“Development proposals within the gaps between Martlesham Heath and Martlesham Village; and Martlesham Village and Woodbridge, as shown on the Policies Map, should demonstrate that: bullet points 1 and 2.”

Show the boundaries of the two areas on the Policies map and delete the three arrows.

Policy MAR8: Special Landscape Areas

- 4.51 Local Plan Policy SSP38 provides the up to date policy on Special Landscape Areas. The boundary of the area shown on the Neighbourhood Plan Policies Map is the same as that shown for Policy SSP38. The wording of Policy MAR8 appears to precede Policy SSP38 as it refers to Policy SP15.
- 4.52 A representation has been made that the policy repeats local strategic policy. I agree that the policy adds nothing locally to the strategic policy and is therefore superfluous and should be deleted.

- 4.53 It would be helpful to plan users to retain the supporting text which should be updated to refer to the latest strategic policies to highlight the significance of the Special Landscape Area and relevant strategic policies. The Qualifying Body has supplied the following text:

“Special Landscape Areas are a county level landscape designation recognised in Core Strategy Policy SP15 (Landscape and Townscape). Part of the Deben Estuary/ Fynn Valley SLA is located within the Martlesham Neighbourhood Plan area. The Martlesham Neighbourhood Plan makes no change to the SLA boundary as previously designated which is shown on the Martlesham Neighbourhood Plan Policies Map. In the interests of applying a consistent approach to applications for development within SLAs, Policy SSP38 of the Site Allocations and Area Specific Policies Document will apply, superseding “saved” policy AP13. This means that development will not be permitted in these areas where it would have a material adverse impact on the qualities of the landscape that make it special. Where development is considered acceptable, landscape improvements should be included as an integral part of the development proposal.”

Recommendation 11: Delete Policy MAR8. Retain the Special Landscape Area designation on the Policies Map and delete the reference to Policy MAR8 in the key.

Revise the supporting text to read:

“Special Landscape Areas are a county level landscape designation recognised in Core Strategy Policy SP15 (Landscape and Townscape). Part of the Deben Estuary/ Fynn Valley SLA is located within the Martlesham Neighbourhood Plan area. The Martlesham Neighbourhood Plan makes no change to the SLA boundary as previously designated which is shown on the Martlesham Neighbourhood Plan Policies Map. In the interests of applying a consistent approach to applications for development within SLAs, Policy SSP38 of the Site Allocations and Area Specific Policies Document will apply, superseding “saved” policy AP13. This means that development will not be permitted in these areas where it would have a material adverse impact on the qualities of the landscape that make it special. Where development is considered acceptable, landscape improvements should be included as an integral part of the development proposal.”

Policy MAR9: Existing Community and Leisure Uses

- 4.54 The policy seeks to safeguard existing community and leisure facilities and sets out how alternative replacement provision should be made.
- 4.55 The fourth bullet point refers to any replacement facility being within or adjacent to the “built up boundary”. For the sake of clarity and consistency

with Policy MAR1 this should be amended to refer to the “physical limits boundary”.

- 4.56 The final paragraph of the Policy states that outside the built-up area boundaries, Policy MAR1 will apply. It is considered that this statement is unclear and unnecessary and should be deleted.
- 4.57 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 12: revise Policy MAR9 as follows:

Revise the third bullet point to read “....relevant *Physical Limits* Boundary where....”

Delete the final paragraph of the policy.

Policy MAR10: New Leisure Uses

- 4.58 This policy sets out support for the development of new leisure facilities and matters to be considered in their development.
- 4.59 The wording of the policy is such that the matters are requirements (they must be....). It is not clear whether these requirements would affect the deliverability of any new community facilities. In order to provide a degree of flexibility in the wording of the policy, it is recommended that the word “should” is used in lines 2 and 5 of the policy.
- 4.60 The penultimate paragraph of the policy supports the development of walking and cycling links to new facilities in Adastral Park. The Qualifying Body has informed me that the routes are deliverable and are proposed as part of the Adastral Park Transport Assessment linking through to Martlesham Heath and to Old Martlesham. It is intended that these are to be secured by planning condition and S106.
- 4.61 The final paragraph of the Policy states that outside the built-up area boundaries, Policy MAR1 will apply. It is considered that this statement is unclear and unnecessary and should be deleted.
- 4.62 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 13: revise Policy MAR10 as follows:

Replace “must” with “should” in lines 2 and 5 of the policy.

Delete the final paragraph of the policy.

Policy MAR11: Provision of Children’s Play and Youth Facilities

4.63 I have no comments on this policy.

Policy MAR12: Allotments and Community Growing Spaces

- 4.64 The policy supports the provision of allotments and community growing spaces. The second part of the policy requires the provision of community growing spaces as part of residential development unless it makes the development unfeasible or unviable.
- 4.65 A representation has been made proposing that a minimum threshold be set for the requirement to be provided. I have concerns about the deliverability of community growing spaces as part of the small scale infill development that is envisaged in the Neighbourhood Plan.
- 4.66 I have asked the Qualifying Body to explain how the community growing spaces are to be delivered. They have replied that it will be as part of any estate size residential developments outside the physical limits boundary.
- 4.67 Community growing areas are an aspiration of the Local Plan review; I consider that their provision is laudable but is not deliverable within the scale of development proposed in the Neighbourhood Plan. It is recommended therefore that the second paragraph of the policy is deleted.
- 4.68 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 14: revise Policy MAR12 by deleting the second paragraph.

Policy MAR13: Non Designated Heritage Assets

- 4.69 Policy MAR13 is a very restrictive policy and states that planning permission will not be granted for development that would result in the loss of the non-designated heritage assets set out in Appendix 1.
- 4.70 It is considered that the policy does not accord with the national guidance in NPPF paragraph 135 which states that “*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. 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.*”
- 4.71 Core Strategy Policy SP15 seeks to enhance and preserve the historic assets of the area.

- 4.72 Representations have been made, including one by Suffolk County Council, that the policy wording does not accord with national guidance. The County Council has expressed concern about the lack of evidence to assess the significance of the assets listed in Appendix 1. They also have concerns about the implication of including Gorseland Primary School as a non-designated heritage asset and the policy as worded may impact on their statutory responsibility to provide school places.
- 4.73 The Local Planning Authority and Qualifying Body have put forward a suggestion to revise the wording of the policy. I have considered their proposed revisions; however, I am recommending revisions to ensure that the policy accords with national guidance.
- 4.74 The Qualifying Body is proposing that the list in Appendix 1 should be divided into two: with a schedule of the seven bowl barrows which are listed by Historic England as Scheduled Ancient Monuments as Appendix 1 and the schedule of proposed non-designated heritage assets as a new Appendix 2.
- 4.75 I have concerns about the lack of evidence to demonstrate the significance of the buildings and structures that are proposed as non-designated heritage assets. I have raised my concerns with the Qualifying Body and Local Planning Authority and they have confirmed that the schedule has been revised and categorised in line with Suffolk Coastal District Council's criteria and that owners and local volunteer groups and societies were consulted as part of the Neighbourhood Plan preparation. They have provided me with a revised schedule listing 25 assets all within the former airbase; a number of assets on the original list have been deleted including Gorseland School.
- 4.76 To assist in the use of the policy and its interpretation by landowners and decision makers, it is suggested that the schedule should be supported by a description of each asset, an assessment of its significance to justify its inclusion in the list, a map showing the boundary of the asset and photographs.
- 4.77 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 15: Revise Policy MAR13 to read:

“Development proposals affecting non-designated heritage assets either directly or indirectly, should respect the significance of and context of the asset and demonstrate how they will contribute to the conservation and enhancement of the heritage asset.”

Delete Appendix 1 and replace with the schedule of Bowl Barrows.

Include a new Appendix 2 with a revised schedule of non-designated heritage assets that satisfy Suffolk Coastal District Council's criteria for non-designated heritage assets.

Revise the third sentence of paragraph 6.25 to read: “*The remains that are still visible have been recorded by Suffolk County Council in their SMR report of Martlesham Airfield dated 25 March 2010.*”

Revise the final sentence of paragraph 6.25 to read: “*The list of buildings and structures has been categorised in line with Suffolk Coastal District Council’s criteria for non designated heritage assets. The local list is included in Appendix 2.*”

Delete second and third sentences of paragraph 6.27. Replace with “*The Parish Council will seek to promote the significance of the non-designated assets and their conservation.*”

Prepare a background report with full details of the Non-Designated Heritage Assets including a description of each asset, an assessment of its significance to justify its inclusion in the list, a map showing the boundary of the asset and photographs.

Access to Health Facilities

- 4.78 This section of the Plan discusses the concerns that have been raised during the consultation on the likely need for new or improved health facilities as a result of the proposed housing development at Adastral Park. No policy is included in the Plan on Health Facilities other than within Policy MAR3. It would be appropriate to record the concerns expressed in paragraph 6.30 in the Report of Consultation.
- 4.79 Representations have been made about the comments made in the section on Access to Health Facilities and note that the proposals at Adastral Park include a new GP facility.
- 4.80 The proposed new health facilities are outside the Neighbourhood Plan area and it is not appropriate for the need for a new surgery, its location or design to be considered in the Plan.

Recommendation 16: delete paragraphs 6.29 to 6.32.

Getting Around

- 4.81 This section highlights a number of transport issues that have been identified from consultations. Of concern is the impact of the A12 on the communities in the plan area. The County Council has commented that it is not clear what evidence has been used to prepare figures 7.1 and 7.2 on traffic flows in the plan area.
- 4.82 The Qualifying Body has confirmed that it is based on local knowledge, feedback from the neighbourhood plan survey and transport assessments prepared by developers of the Adastral Site. As the maps are not based on

published Highway Authority data, it is recommended that their source be noted in a footnote to each figure.

Recommendation 17: Add a footnote to Figures 7.1 and 7.2 to note their source.

Policy MAR14: Cycling, Walking and Disabled Access Routes

- 4.83 The justification to the policy highlights many issues faced by pedestrians, cyclists and people with disabilities. Policy MAR14 proposes support to new and improved routes and crossing points.
- 4.84 I have no comments on the policy.

Policy MAR15: Cycling, Walking and Disabled Access in Martlesham Heath Retail Park

- 4.85 The policy requires developers both within and adjacent to the Martlesham Heath Retail Park to demonstrate how they will ensure easy and safe access for pedestrians, cyclists and disabled users. The word “adjacent” has been omitted in error from line 1 of the policy. To ensure consistency, the title of the policy should be revised to refer to “within and adjacent to” Martlesham Heath Retail Park.
- 4.86 The plan does not show the boundary of the area covered by the policy. The Qualifying Body has informed me that they are working with the Local Planning Authority to define the area of the Retail Park as part of the Local Plan review. The Qualifying Body has suggested that the policy should be revised to relate to Martlesham Heath General Employment Area as defined on the Local Plan Policies Map.
- 4.87 I consider that the proposed amendment amounts to a significant enlargement of the area to be covered by the policy which has not been the subject of consultation and which is not necessary for the policy to satisfy the Basic Conditions.
- 4.88 To ensure that a consistent approach is taken to determining proposals within the Retail Park using this and subsequent policies, it is considered that it would be helpful to define the area of the Retail Park in the justification to the section headed “Martlesham Heath Retail Park and Business Park”.
- 4.89 The justification to the policy explains the difficulties faced by crossing the internal roads in the retail park and the problems that arise by cars being parked on the estate roads.
- 4.90 A representation has been made that the policy should confirm that additional assessments and/or provision of crossing points should be justified and

proportional to the proposed development and should meet all of the relevant tests for developer contributions.

- 4.91 National guidance states that development proposals can only be asked to provide improvements that arise as a result of the development. This guidance will apply to the consideration of any development proposals under this policy and there is no need to repeat it.
- 4.92 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 18: revise Policy MAR15 as follows:

Insert “*adjacent*” after “within and” in line 1 of the policy.

Revise the title of the Policy to read “.....*within and adjacent to Martlesham Heath Retail Park.*”

Add the following after paragraph 7.24: “*The extent of the Martlesham Heath Retail Park is defined in paragraph 7.XX in the section on the Martlesham Heath Retail Park and Business Park.*”

Policy MAR16: Parking Standards

- 4.93 The first and fourth paragraphs of the policy repeat the requirements of Policy DM19 which states that proposals for all types of new development will be required to conform to the District Council’s adopted parking standards. These paragraphs are considered unnecessary as they add no locally specific matters to the District policy. The second sentence in the first paragraph is not a policy statement; it is a reason for the policy. The supporting text explains that the Plan supports the use of the County Council’s Parking Standards.
- 4.94 The second paragraph states that the parking provision must be permanently available for parking use. The County Council has commented that this would be unenforceable as once dwellings are occupied, the use of garages for storage cannot be prevented.
- 4.95 The third paragraph seeks to resist the proposal that would reduce the level of off-street parking provision unless it can be satisfactorily demonstrated that the amount of overall provision is adequate.
- 4.96 A representation has been made stating that there should be no reduction of existing parking facilities or numbers however or wherever parking is provided.
- 4.97 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 19: delete paragraphs 1, 2 and 4 from Policy MAR16 and revise the title of the policy to Parking Provision.

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

- 4.98 This policy sets out the requirements for customer and staff parking and HGV management, parking and turning within the retail park and business park.
- 4.99 The first paragraph of the policy and paragraph 7.31 refer to the need for planning applications to be accompanied by an assessment of the ratio of parking spaces to floorspace at existing stores and to demonstrate how well this accommodates the parking need. The reasons for this requirement are unclear. In any case the parking requirements for different types of stores will vary and cannot be used to predict the needs of new stores. The County Council has commented on the relevance of this requirement and notes that new developments cannot be required to remedy existing infrastructure deficits. It is therefore recommended that this requirement is deleted.
- 4.100 A representation has been made that the policy should confirm that additional assessments should be justified and proportional to the proposed development and should meet all of the relevant tests for developer contributions. It notes that the policy should not seek to impose a higher level of parking requirement to that set out in the County Council's Guidance.
- 4.101 Development proposals can only be asked to provide improvements to parking and the local road network that arise as a result of the development. They cannot be asked to rectify existing problems.
- 4.102 The policy uses the word "must" throughout. In view of the importance of providing for vehicular parking and HGV manoeuvring within these areas, I am making no recommendation concerning its use in this policy. The second part of the policy refers to proposals being expected to meet the criteria. To improve the clarity of the wording it is recommended that this be revised to "should meet".
- 4.103 At this stage the boundary of the Retail Park cannot be defined on a map. The Retail Park and Business Park together form the General Employment Area which is shown on the Policies Map. The Local Planning Authority has informed me that the Retail Park should be identified as described in the Core Strategy and the latest Retail and Commercial Leisure Town Centre Study. The Core Strategy describes the Retail Park as "*centred on the retail park at Beardmore Park*". The 2017 Retail and Commercial Leisure Town Centre Study commissioned in support of the Local Plan Review identifies the area by reference to specific stores concentrated on Beardmore Park.
- 4.104 To provide clarity for plan users, it is recommended that additional text is added at the beginning of this section to describe the extent of the Retail Park

and Business Park. The key to the Policies Map should be revised so that the General Employment Area relates to Policy MAR17 as well as Policy MAR19.

- 4.105 Paragraph 7.29 incorrectly refers to Policy MAR14 identifying the need to improve safe cycling and walking at the Retail Park. This should be corrected to Policy MAR15.
- 4.106 Paragraph 7.30 states that “*Policy MAR15 recognises that both the Retail Park and Business Park have the potential to expand and....*” This is inaccurate as Policy MAR15 relates to access. It is recommended that it be corrected by deleting “*Policy MAR15 recognises that*”.
- 4.107 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 20: delete the final sentence of the first paragraph of Policy MAR17 and paragraph 7.31.

Revise the second paragraph of the policy to read “....development proposals *should* meet the following criteria:”

Add the following at the beginning of the justification, before paragraph 7.29: “*Martlesham Heath Retail Park and Business Park together form the Martlesham Heath General Employment Area. The extent of the Martlesham Heath Retail Park is as described in the Core Strategy and the Retail and Commercial Leisure Town Centre Study 2017, or as defined in a subsequent strategic policy. The remainder of the General Employment Area constitutes the Business Park. The General Employment Area is shown on the Policies Map.*”

Revise the key to the Policies Map so that the General Employment Area includes Policy MAR17.

Revise paragraph 7.29 to refer to Policy MAR15.

Delete “Policy MAR15 recognises that” from paragraph 7.30.

Commercial and Retail

Policy MAR18: Martlesham Heath Retail Park

- 4.108 The policy supports the provision of retail uses at the Martlesham Heath Retail Park with the provisos that it is of a nature and scale that cannot be supported in a Retail or District Centre. Secondly that the proposal demonstrates that the principal type of retail use proposed would not impact on the vitality and viability of the Martlesham Heath District Centre.
- 4.109 NPPF paragraphs 26 to 27 provide guidance on the assessment of retail development outside town centres and advises local planning authorities to

require an impact assessment if the development is over a proportionate, locally set threshold. Where no thresholds are set, the default threshold is 2,500 sq m.

- 4.110 As it is not proposed to set a local threshold, it would be helpful to plan users to include a statement in the justification to the policy that an impact assessment will be required for developments over 2,500 sq m.
- 4.111 Paragraph 3.101 of the Core Strategy advises that further development at the out of centre retail parks will be resisted where it would compete to the detriment of the viability of the district's market towns and other identified neighbouring retail centres.
- 4.112 As noted in paragraph 4.103 above, the boundary of the Retail Park has not been defined. I have included a modification under Recommendation 20 that an additional paragraph should be added to the introduction to the section on Martlesham Heath Retail Park and Business Park to address the matter. It would be helpful to plan users to include a reference to the justification to Policy MAR18.
- 4.113 A representation has been made proposing that the following text be added to the first bullet point: "*or a sustainable location in relation to these centres determined via the sequential test*". The additional wording would provide a degree of flexibility to consider the suitability of other sites in edge of centre locations close to these centres that satisfy the sequential test.
- 4.114 A representation has been made that the policy wording should more closely reflect the retail tests in the NPPF. It proposes that the first bullet point should support proposals where it has been demonstrated that there are no sites that are suitable or available in a centre. The second bullet should state that applications should demonstrate that there would not be a significant adverse impact on the vitality and viability of the District Centre. I agree that these suggestions would clarify the wording of the policy and ensure that it better reflects the NPPF.
- 4.115 A representation has been made that the policy should be widened to consider the impact of any uses which impact on the vitality and viability of the uses in the Martlesham Heath District Centre. It is not clear which other uses should be considered and as Policy MAR18 refers to all forms of Class A retail uses, I consider it to be sufficiently broad.
- 4.116 Subject to the modifications recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 21: revise Policy MAR18 as follows:

Revise the first bullet point to read: "*it has been demonstrated that there are no sites that are suitable or available in or on the edge of a Retail Centre.....Policy SP9; and*"

Revise the second bullet point to read: “would not have a *significant adverse* impact on”

Add the following at the end of paragraph 8.9: “*Impact assessments will be required for retail developments over 2,500 sq m.*”

Add the following after paragraph 8.5: “*The extent of the Martlesham Heath Retail Park is defined in paragraph 7.XX in the section on the Martlesham Heath Retail Park and Business Park.*”

Policy MAR19: General Employment Areas

- 4.117 The first part of the policy identifies the General Employment Area as suitable for B1, B2 and B8 uses. It has incorporated wording from saved Policy AP51 including the phrase “planning permission will normally be granted for”. I have explained in paragraph 3.11 above why this form of wording is not appropriate.
- 4.118 A representation has been made that the policy does not reflect what has occurred on the ground. To the west of Gloster Road there is a mix of uses including Class A, B, D and sui generis uses. Land to the east of Gloster Road is mainly B class and sui generis uses. A more flexible range of uses is proposed for the area west of Gloster Road.
- 4.119 It is recommended that the first part of the policy is rephrased as “*the development of B1, B2 and B8 uses will be supported*”. The description of the use classes should be amended so that it is consistent with the wording used in the Use Classes Order. A greater degree of flexibility could be included in the policy so that other appropriate employment generating uses can be located in the area to reflect current usage. Reference in paragraph 8.4 of the justification to the retention of the saved policy should be revised as a consequence.
- 4.120 Policy MAR19 is clearly worded to state that it relates to the whole of the General Employment Area. However, paragraph 8.4 refers to the policy applying to the Business Park; confusingly, paragraph 8.5 refers to the Industrial Park. The justification should be revised to provide clarity to state that the policy applies to the whole of the General Employment Area, which includes both the Retail Park and Business Park.
- 4.121 The title of the policy and first paragraph refers to “Areas” in the plural, however only one area is shown on the Policies Map. The key to the map incorrectly refers to Policy MAR18 and should be corrected to Policy MAR19. As the boundary of the Retail Park cannot be mapped at this stage for the reasons set out in paragraphs 4.88 and 4.103 above, it is recommended that the Business Park is defined in the justification as that part of the Martlesham Heath General Employment Area outside the Retail Park.

- 4.122 The second part of the policy seeks to resist the change of use of Class B2 and B8 uses to retail uses and sets out two criteria that are to be met before such a change of use would be acceptable. It refers to retail uses as A1 to A3. However, amendments to the Use Classes Order has amended the retail uses to A1 to A5. It is recommended that the references in the policy are updated to reflect current use classes and their descriptions.
- 4.123 I have asked the Local Planning Authority whether they consider that the second part of the policy would be deliverable. They have proposed a revision to refer to their Supplementary Planning Guidance on Marketing Guidance.
- 4.124 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 22: revise Policy MAR 19 as follows:

Revise the first paragraph to read: “....on the Martlesham Heath General Employment Area shown on the Policies Map, the development of B1 (*business*), B2 (*general industrial*) and B8 (*storage or distribution*) uses will be supported.

Revise the second paragraph to read: “...retail uses (Classes A1 to A5) will be resisted. Such changes of use will only be permitted if it has been satisfactorily demonstrated *to the LPA that the location has been effectively marketed over a reasonable period of time in accordance with the Suffolk Coastal Commercial Property Marketing Guide dated 12th August 2016 (or subsequent updates).*” Delete the bullet points.

Include further information on the Supplementary Planning Guidance and marketing requirements in the justification.

Revise the first sentence of paragraph 8.4 to read “... Martlesham. The Martlesham Heath *General Employment Area* is retained and *the wording of the saved policy has been updated to promote the area for business use, to resist changes of use to retailing and to set out the circumstances when retail uses will be acceptable.*”

Revise the second sentence of paragraph 8.5 to read “*Business Park*”.

Revise the title of Policy MAR19 to “*Martlesham Heath General Employment Area*”.

Correct the key to the Policies Map.

Policy MAR20: Sandy Lane, Martlesham

- 4.125 Paragraph 8.14 states that the Sandy Lane area contains intensive agricultural industry buildings. This policy seeks to retain the saved Policy

AP213 to control the re-use of sites and buildings in the Sandy Lane Area for employment uses.

- 4.126 I have a number of concerns about the clarity of the wording of this policy and its application and deliverability. The first section states that “proposals will only be considered in the context of a comprehensive scheme for the whole complex”.
- 4.127 The first bullet point of the first section refers to buildings being retained in the western part of the site and the remainder being removed and the land restored. The eighth bullet refers to the demolition and restoration of the area. The whole area is built up. It is not clear which area it is intended should continue to be built up and which restored. I have asked the Qualifying Body whether these parts of the policy are deliverable.
- 4.128 The second bullet refers to buildings being in keeping with the exposed location of the AONB. The third states it should reflect the location in the AONB. It is not clear how these bullet points are to be interpreted given that the buildings and extent of the site have been in existence for some time.
- 4.129 Bullet point 5 states that access is to be from the western end of the site and other accesses, except for residential, are to be removed. There is clearly a well established access route to the site and it is not clear what the intentions of the policy are concerning the removal of other accesses.
- 4.130 I have a number of concerns about other sections of the policy as follows:
- The second and third sections are worded as requirements using the word “must”.
 - The fourth section refers to only B1 uses being permitted. However the area includes a variety of uses including buildings for the sale of car parts and car repairs.
 - The final part of section five preferring businesses providing jobs and services to the local community may not be enforceable.
- 4.131 I have asked the Qualifying Body and Local Planning Authority to review the policy. They have proposed revisions which I am recommending to ensure that the policy is clear and unambiguous in order to provide clear guidance for decision makers and plan users.
- 4.132 Subject to the modification recommended, it is considered that the policy meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 23: Revise Policy MAR 20 as follows:

“Planning permission will be granted for employment development, including re-development or refurbishment of existing buildings on land at Sandy Lane, Martlesham as identified on the Policies Map, provided that:

- ***The use is restricted to activities falling within Use Classes B1 and B2 or extensions and alterations to established premises and businesses on the site for the continuation of existing activities;***
- ***It does not harm the AONB setting and any designated heritage assets. New buildings, conversions and external works (including re-cladding) shall be of a high standard and should not detract from the character of the AONB;***
- ***It does not increase the number of access routes in and out onto Sandy Lane;***
- ***A transport assessment can demonstrate to the satisfaction of the Highway Authority that the scale and type of traffic generated is acceptable in terms of impact on the local road network;***
- ***Where possible, it improves pedestrian and cycling conditions on Sandy Lane; and***
- ***It supports the provision of suitable premises for small businesses.”***

Policy MAR21: Broadband

- 4.133 The policy seeks to ensure that all new residential, commercial and community premises are served by a superfast broadband connection.
- 4.134 NPPF paragraphs 42 to 43 states that Local Plans should support the expansion of highspeed broadband. I have no comments on this policy.

Non-Policy Actions

- 4.1395 This section highlights other matters that have arisen during the consultations. The first point concerns the range of housing required. A revision to this section is advised to make it clear that this will be met through developments outside the Neighbourhood Plan area.

Recommendation 24: revise Table 9.1 first point to read:

“Work with the Local Planning Authority to ensure that a wide range of housing is provided in the parish outside the Neighbourhood Plan area to include....”

5.0 Referendum

- 5.1 The Martlesham Neighbourhood Plan reflects the views held by the community as demonstrated through the consultations and, subject to the modifications proposed, sets out a realistic and achievable vision to support the future improvement of community.
- 5.2 I am satisfied that the Neighbourhood Plan meets all the statutory requirements, in particular those set out in paragraph 8(1) of schedule 4B of the Town and Country Planning Act 1990 and, subject to the modifications I have identified, meets the basic conditions namely:
- has regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contributes to the achievement of sustainable development;
 - is in general conformity with the strategic policies contained in the Development Plan for the area;
 - does not breach, and is otherwise compatible with, EU obligations and human rights requirements
- 5.3 **I am pleased to recommend to Suffolk Coastal District Council that the Martlesham Neighbourhood Plan should, subject to the modifications I have put forward, proceed to referendum.**
- 5.4 I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan area. I have considered whether any of the policies and proposals would affect the adjacent community of Woodbridge and In all the matters I have considered I have not seen anything that suggests the referendum area should be extended beyond the boundaries of the plan area as they are currently defined. I recommend that the Neighbourhood Plan should proceed to a referendum based on the neighbourhood area defined by the Suffolk Coastal District Council on 5 May 2015.

6.0 Background Documents

6.1 In undertaking this examination, I have considered the following documents

- Martlesham Neighbourhood Plan Submission Draft Version May 2017
- Martlesham Neighbourhood Plan Basic Conditions Statement
- Martlesham Neighbourhood Plan Consultation Statement
- Martlesham Neighbourhood Plan SEA and HRA Screening Reports
- National Planning Policy Framework March 2012
- Planning Practice Guidance March 2014 (as amended)
- The Town and Country Planning Act 1990 (as amended)
- The Localism Act 2011
- The Neighbourhood Planning (General) Regulations 2012
- Suffolk Coastal District Local Plan Core Strategy and Development Management Policies July 2013
- Suffolk Coastal District Local Plan Site Allocations and Area Specific Policies Development Plan Document January 2017
- Suffolk Coastal Local Plan “saved” policies.
- Suffolk Guidance for Parking Technical Guidance Adopted November 2014 Second Edition - November 2015
- Commercial Property Marketing Best Practice Guide Suffolk Coastal District Council 12th August 2016.
- The Ipswich Borough and Suffolk Coastal – Retail and Commercial Leisure Town Centre Study 2017.

7.0 Summary of Recommendations

Recommendation 1: Show the lifespan of the Plan on the front cover.

Recommendation 2: revise the Introduction as follows:

Revise paragraph 1.1 to include reference to the “*adopted Site Allocations and Area Specific Policies Development Plan Document and “saved” policies*”.

Add the following at the end of paragraph 1.3 “*within the Martlesham Neighbourhood Plan area*.”

Delete “and, under the guidance provided by the NPPF, is up to date” from paragraph 1.17.

Reference the criteria in policies by numbers and/or letters rather than use bullet points.

Correct the policy numbers in the Policies Map key. Correct the numbers of the figures.

Recommendation 3: revise Table 3.1 to demonstrate how the vision statements are to be delivered through the policies of the Neighbourhood Plan. Those vision statements that are not delivered through the plan policies should be deleted or revised.

Recommendation 4: Include the area of Deben Avenue within the Physical Limits Boundary on the Policies Map.

Add the following after paragraph 4.2: “*Although Deben Avenue is within the physical limits of Kesgrave (as shown in Map 40 in Appendix 6a of the Site Allocations and Area Specific Policies - Development Plan Document January 2017), it is within the Martlesham Neighbourhood Plan area*”.

Recommendation 5: Revise Policy MAR2 to read:

“Areas to be protected from development, as identified on the Policies Map, comprise local scale sites, gaps, gardens and spaces that make an important contribution to the character and setting of Martlesham in their undeveloped form. Accordingly, development within these areas will be severely restricted.”

Delete reference to saved Policy AP28 from the justification.

Recommendation 6: revise Policy MAR3 as follows:

Revise the first paragraph to read: “*...new development should be in keeping with*”

Revise paragraph 2 to read: “In particular, development *should be....*”

Revise paragraph 4 to read: “Any existing leisure uses on sites accessible to the public should be retained or re-provided in line with Policy MAR9.”

Replace the “; and” at the end of the third bullet point with a full stop.

Revise the last paragraph to read: “Any development proposals must demonstrate that they have engaged with the Clinical Commissioning Group in respect of the existing primary healthcare facility. Proposals shall not *prejudice* the potential for expansion of the existing healthcare *unless it is clearly demonstrated* that this is not necessary to support the growth proposed in the Neighbourhood Plan area and at the strategic site at Adastral Park during the plan period.”

Revise paragraph 4.20 to read: “*Any future planning decisions made in the village centre (as defined on the Policies Map) should take account of the demonstrated need for the future expansion of the healthcare facility.*”

Recommendation 7: Revise Policy MAR4 as follows:

Delete second and eighth bullet points.

Delete the word “and” from the end of bullet points except for the penultimate one.

Recommendation 8: Revise Policy MAR5 to read:

“Residential developments should provide a mix of dwelling sizes *and tenures*, both market and affordable housing, that meet the requirements of Suffolk Coastal Core Strategy Policy SP3. *In particular, this should provide two and three bedroom properties to meet the needs of older people looking to downsize and local people looking to remain in the area.*”

Delete that second sentence of paragraph 5.10 and all of paragraph 5.11. Add the following to paragraph 5.10: “*Housing Needs Surveys will be undertaken in the future to determine the need in the plan area of any particular types, sizes and tenures of housing.*”

Redesign Figure 5.1.

Recommendation 9: revise Policy MAR6 as follows:

Place the first paragraph and the first four bullet points in the justification to Policy MAR6.

Revise the second paragraph to read:” The development of a *new mooring for a residential boat, alterations to or replacement of an existing residential boat or for the construction of jetties, platforms and*

sheds associated with residential boat moorings should demonstrate the following:

Delete “that” from the first bullet point.

Replace the full stops in the first and second bullet point with semicolons and add “and” at the end of the second bullet point.

Recommendation 10: Revise Policy MAR7 as follows:

“Development proposals within the gaps between Martlesham Heath and Martlesham Village; and Martlesham Village and Woodbridge, as shown on the Policies Map, should demonstrate that: bullet points 1 and 2.”

Show the boundaries of the two areas on the Policies map and delete the three arrows.

Recommendation 11: Delete Policy MAR8. Retain the Special Landscape Area designation on the Policies Map and delete the reference to Policy MAR8 in the key.

Revise the supporting text to read:

“Special Landscape Areas are a county level landscape designation recognised in Core Strategy Policy SP15 (Landscape and Townscape). Part of the Deben Estuary/ Fynn Valley SLA is located within the Martlesham Neighbourhood Plan area. The Martlesham Neighbourhood Plan makes no change to the SLA boundary as previously designated which is shown on the Martlesham Neighbourhood Plan Policies Map. In the interests of applying a consistent approach to applications for development within SLAs, Policy SSP38 of the Site Allocations and Area Specific Policies Document will apply, superseding “saved” policy AP13. This means that development will not be permitted in these areas where it would have a material adverse impact on the qualities of the landscape that make it special. Where development is considered acceptable, landscape improvements should be included as an integral part of the development proposal.”

Recommendation 12: revise Policy MAR9 as follows:

Revise the third bullet point to read “....relevant *Physical Limits* Boundary where....”

Delete the final paragraph of the policy.

Recommendation 13: revise Policy MAR10 as follows:

Replace “must” with “should” in lines 2 and 5 of the policy.

Delete the final paragraph of the policy.

Recommendation 14: revise Policy MAR12 by deleting the second paragraph.

Recommendation 15: Revise Policy MAR13 to read:

“Development proposals affecting non-designated heritage assets either directly or indirectly, should respect the significance of and context of the asset and demonstrate how they will contribute to the conservation and enhancement of the heritage asset.”

Delete Appendix 1 and replace with the schedule of Bowl Barrows.

Include a new Appendix 2 with a revised schedule of non-designated heritage assets that satisfy Suffolk Coastal District Council’s criteria for non-designated heritage assets.

Revise the third sentence of paragraph 6.25 to read: “*The remains that are still visible have been recorded by Suffolk County Council in their SMR report of Martlesham Airfield dated 25 March 2010.*”

Revise the final sentence of paragraph 6.25 to read: “*The list of buildings and structures has been categorised in line with Suffolk Coastal District Council’s criteria for non designated heritage assets. The local list is included in Appendix 2.*”

Delete second and third sentences of paragraph 6.27. Replace with “*The Parish Council will seek to promote the significance of the non-designated assets and their conservation.*”

Prepare a background report with full details of the Non-Designated Heritage Assets including a description of each asset, an assessment of its significance to justify its inclusion in the list, a map showing the boundary of the asset and photographs.

Recommendation 16: delete paragraphs 6.29 to 6.32.

Recommendation 17: Add a footnote to Figures 7.1 and 7.2 to note their source.

Recommendation 18: revise Policy MAR15 as follows:

Insert “*adjacent*” after “*within and*” in line 1 of the policy.

Revise the title of the Policy to read “*.....within and adjacent to Martlesham Heath Retail Park.*”

Add the following after paragraph 7.24: “*The extent of the Martlesham Heath Retail Park is defined in paragraph 7.XX in the section on the Martlesham Heath Retail Park and Business Park.*”

Recommendation 19: delete paragraphs 1, 2 and 4 from Policy MAR16 and revise the title of the policy to Parking Provision.

Recommendation 20: delete the final sentence of the first paragraph of Policy MAR17 and paragraph 7.31.

Revise the second paragraph of the policy to read “....development proposals *should* meet the following criteria:”

Add the following at the beginning of the justification, before paragraph 7.29: “*Martlesham Heath Retail Park and Business Park together form the Martlesham Heath General Employment Area. The extent of the Martlesham Heath Retail Park is as described in the Core Strategy and the Retail and Commercial Leisure Town Centre Study 2017, or as defined in a subsequent strategic policy. The remainder of the General Employment Area constitutes the Business Park. The General Employment Area is shown on the Policies Map.*”

Revise the key to the Policies Map so that the General Employment Area includes Policy MAR17.

Revise paragraph 7.29 to refer to Policy MAR15.

Delete “Policy MAR15 recognises that” from paragraph 7.30.

Recommendation 21: revise Policy MAR18 as follows:

Revise the first bullet point to read: “*it has been demonstrated that there are no sites that are suitable or available in or on the edge of a Retail Centre.....Policy SP9; and*”

Revise the second bullet point to read: “*would not have a significant adverse impact on*”

Add the following at the end of paragraph 8.9: “*Impact assessments will be required for retail developments over 2,500 sq m.*”

Add the following after paragraph 8.5: “*The extent of the Martlesham Heath Retail Park is defined in paragraph 7.XX in the section on the Martlesham Heath Retail Park and Business Park.*”

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Revise the first paragraph to read: “....on the Martlesham Heath General Employment Area shown on the Policies Map, the development of B1 (*business*), B2 (general industrial) and B8 (*storage or distribution*) uses will be supported.

Revise the second paragraph to read: “...retail uses (Classes A1 to A5) will be resisted. Such changes of use will only be permitted if it has been satisfactorily demonstrated *to the LPA that the location has been effectively marketed over a reasonable period of time in accordance with the Suffolk Coastal Commercial Property Marketing Guide dated 12th August 2016 (or subsequent updates).*” Delete the bullet points.

Include further information on the Supplementary Planning Guidance and marketing requirements in the justification.

Revise the first sentence of paragraph 8.4 to read “... Martlesham. The Martlesham Heath *General Employment Area* is retained and *the wording of the saved policy has been updated to promote the area for business use, to resist changes of use to retailing and to set out the circumstances when retail uses will be acceptable.*”

Revise the second sentence of paragraph 8.5 to read “*Business Park*”.

Revise the title of Policy MAR19 to “*Martlesham Heath General Employment Area*”.

Correct the key to the Policies Map.

Recommendation 23: Revise Policy MAR 20 as follows:

“Planning permission will be granted for employment development, including re-development or refurbishment of existing buildings on land at Sandy Lane, Martlesham as identified on the Policies Map, provided that:

- *The use is restricted to activities falling within Use Classes B1 and B2 or extensions and alterations to established premises and businesses on the site for the continuation of existing activities;*
- *It does not harm the AONB setting and any designated heritage assets. New buildings, conversions and external works (including re-cladding) shall be of a high standard and should not detract from the character of the AONB;*
- *It does not increase the number of access routes in and out onto Sandy Lane;*
- *A transport assessment can demonstrate to the satisfaction of the Highway Authority that the scale and type of traffic generated is acceptable in terms of impact on the local road network;*
- *Where possible, it improves pedestrian and cycling conditions on Sandy Lane; and*
- *It supports the provision of suitable premises for small businesses.”*

Recommendation 24: revise Table 9.1 first point to read:

“Work with the Local Planning Authority to ensure that a wide range of housing is provided in the parish outside the Neighbourhood Plan area to include....”