



Martlesham Neighbourhood Plan

Summary of Representations Sent to Independent Examiner

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ALDI Stores (Planning Potential)

Notes ALDI has an as yet undetermined planning application for a food store at Gloster Road (DC/17/0055/FUL). Will secure high quality contemporary development, up to 50 jobs and secure a substantial economic development solution for a site that has been redundant for many years. In response to a leaflet drop late 2016 proposal received phenomenal support which has continued through the planning application stage. Company keen continue working with Parish Council.

MAR3 Development in Martlesham Heath and Fig 4.1:

Notes policy has been amended from earlier version by removal of two alternative sites now discounted as 'unavailable' and 'unsuitable'. Notes application site is the only site available and suitable for the proposed development therefore satisfying the sequential approach.

MAR18 Martlesham Heath Retail Park:

Object to policy as worded as no evidence base included to support its inclusion. Policy is ambiguous with no plan referred to. The policy in effect is designating the retail park as a retail centre in addition to those centres listed in the retail hierarchy set out in Suffolk Coastal Local Plan policy SP9. Their site is more accessible to Martlesham Heath District Centre than the Retail park area therefore the policy does not accord with NPPF and does not support sustainable economic development. Recommends amendment to first bullet point to read: "The nature and scale of the retail provision cannot be support in a Retail Centre or District Centre as identified in Suffolk Coastal Local Plan Strategic Policy SP9 *or a sustainable location in relation to these centres determined via the sequential test;* and"

MAR19 General Employment Areas:

Policy does not accord with NPPF as it does not reflect what is occurring on the ground in the area. Greater flexibility to support a range of uses compatible with the existing uses in the area should be allowed. If necessary, the land to the east of Gloster Road can be subject to a more prescriptive policy as it is dominated by more B class uses. The definition of suitable 'employment' uses should be amended to reflect the NPPF's definition of 'economic development'. At present no definition of 'employment' is supplied.

ALDI Martlesham

Map provided in support of written submission identifying range of uses in and around their planning application site.

Gladman Development

Comments highlight issues with the plan as currently presented and its relationship with national and local planning policy. Disappointed that many concerns submitted at Reg 14 stage have not been addressed.

NPPF and PPG: References specific requirements for the preparation of neighbourhood plans to be in conformity with strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs. Notes Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change and that this requirement is applicable to neighbourhood plans (paragraphs 16, 17 and 184 of NPPF).

PPG updates Feb 2016 and May 2016. Makes reference to sections relating to the evidence base required to support an emerging neighbourhood plan and what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. Notes PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded.

Relationship to Local Plan: Relevant plan is Suffolk Coastal District Local Plan Core Strategy and Development Management Policies Document adopted July 2013. Notes the Examining Inspector expressed significant concerns regarding the Plan's ability to meet full Objectively Assessed Needs for housing over the period to 2027 and that Council committed to undertake a review by 2015. Notes review is at an early stage. Suggests MNP is sufficiently flexible towards new development and references Section 38(5) of Planning and Compulsory Purchase Act 2004 ie if conflict arises between policies in different plans should be resolved in favour of the policy is the last document to be adopted, approached or published.

Neighbourhood Plan.**MAR1 – Physical Limits Boundaries.**

Oppose the use of settlement limits if these would preclude the delivery of otherwise sustainable growth options coming forward. NPPF does not prevent delivery of sustainable growth opportunities being delivered adjacent to existing settlements so long as the adverse impacts of a development proposal do not significantly and demonstrably outweigh the benefits of development. Considers policy would act to suppress growth in the sustainable settlements such as Woodbridge. 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.

MAR2 - Areas to be Protected from Development:

Considers current policy wording to be overly restrictive. Does not conform with the Framework (para 113 – need to distinguish between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status). Suggests policy is deleted.

MAR5 – Residential Mix:

Supports principle but notes that housing mix will inevitably change over a period of time. To secure greater degree of flexibility suggests policy wording includes reference to the latest housing needs assessment.

MAR7 – Local Gaps:

Considers new development can often be located in countryside gaps without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. Therefore questions the purpose of the proposed gap designations, particularly if this would prevent the development of otherwise sustainable and deliverable housing sites to meet the District’s housing needs.

Considers the identification of a Local Gap to be a strategic policy which should only be confirmed in an adopted Local Plan. Notes it is unclear if policy AP212 is to be retained and progressed through the emerging Local Plan. As the policy already applies to the neighbourhood area sees no merit in simply repeating it.

MAR8 – Special Landscape Areas:

Considers policy does not align sufficiently with the requirements of the Framework and PPG. Considers that on the basis that it merely seeks to repeat the requirements contained in the Suffolk Coastal Local Plan Saved Policy AP13 it should be deleted.

MAR13 – Non Designated Heritage Assets.

Supports the conservation of designated heritage assets but notes policy states that planning permission will not be granted for development that would result in the loss of non-designated heritage assets identified in Appendix 1. As a result, approach is overly restrictive and contrary to paragraph 135 of NPPF which requires balanced judgement having regard to the scale of any harm of loss and the significance of the heritage asset.

Landbridge chartered surveyors property advisors

Acts on behalf of Fordley Land Company and Suffolk Life Annuities Ltd owners of The Square Martlesham Heath.

Para 7.28: Want Plan to make clear that there should be no reduction of existing parking facilities or numbers, however or wherever parking is provided.

MAR18 – Martlesham Heath Retail Park and protection of current retail uses at The Square.

Endorse policy but suggest that the uses are widened to include any uses which impact on the vitality and viability in The Square.

Lichfields (London Metric)

Client owns Martlesham Heath Retail Park together with site to the north of Anson Road, adjacent to the Tesco Store. Welcomes the NP but requests a number of amendments.

MAR18 Martlesham Heath Retail Park:

Welcomes policy and support in principle of retail uses within the retail park. Considers retail park should be shown on Policies Map separate from the general employment area.

MAR15 and MAR17:

References earlier representations made that wording of policies should be clarified to confirm that additional assessments and/or provision of crossing points etc should be justified and proportional to the proposed development. Considers this should be the starting point for the consideration of any proposal. Notes that the vehicle parking standards contained in the Suffolk Advisory Parking Guidance are maximums for all Class A uses. The NP should not seek to impose a higher level of parking.

PRCArchitecture & Planning Ltd

Acts on behalf of Max Industrial GP Ltd and Mas Industrial Nominees. Notes that clients were not approached to take part in formative discussion. Asks that they are involved in any future meetings/ discussions regarding the Neighbourhood Plan which involve the future of MHBP between the local coordinating groups and/or the Council.

Comments based on outstanding matters from earlier submitted comments.

Para 2.13 (original doc)

Notes reference to the industrial park has been retained on the basis that '*concerns have been raised over the impact on the district centre*'. Notes no evidence is provided for these concerns.

Para 2.16 seeks removal of words '....and the units in the industrial park'

Para 2.14

Notes whilst individual owners of business may have been approached, the owner/ manager of the site who is seeking to enhance the overall impact of the site and who has the strategic view of its operation, was not.

Para 2.17

Notes '..and small local services...' does not appear to be added in text as stated. This should be inserted in paragraph 2.17.

Paras 5.8 – 5.11

Considers it likely that the community did not raise the issue as they are unaware of the significant need. NP is put together by all aspects of the community including the business community - the business community is raising the need and it should be addressed. Areas on the Martlesham Heath Business Park are still available and a suitable location for extra care/ care home accommodation for the elderly and should be investigated.

Para 8.1 Same issue re lack of clients involvement.

Para 8.6

Notes Rre the bakery and hairdressers no evidence of competition provided. Suggests adjust wording of paragraph 2.15 on pages 8 and 9 to remove unproven assertion of hairdresser and bakery and local services in MHBP Impacting the local centre, and remove reference to the hairdresser and bakery from paragraph 8.7.

Table 9.1 Clarify meaning of ‘fragmented interests’ in column 3 Road Inadequacies.

Savills (Grainger plc)

Client has recently purchased BPT Ltd so has freehold interest in the locality with the associated covenants on the existing properties at Martlesham Heath.

Overall conclusion:

Considers Neighbourhood Plan to be a beneficial and valued addition to the Development Plan providing greater detail on the localised requirements and vision. However, notes certain aspects of Plan where there is slight inconsistency and gaps. Considers rectification of these points would lead to a clearer overall plan in accordance with the principles in the NPPF and aligning with adopted policies in the Development Plan. Notes also opportunities for the Plan to be more proactive in accommodating and supporting proportionate and sustainable growth within this highly sustainable location, to the benefit of existing and future communities, as well as meeting the objectives of the NPPF.

Para 1.1:

Refers only to the Core Strategy as the ‘other part’ of the Development Plan being relevant to the designated neighbourhood plan area. Should also refer to saved policies of the Local Plan (First and Second Alterations) when referring to the Development Plan.

Para 1.17:

Notes paragraph states Core Strategy is up to date. This does not take into account other matters and triggers that can render a policy document either wholly or partly out of date, such as the five year housing land supply position. Suggests re-word as follows:
‘The Suffolk Coastal Core Strategy and Development Management Policies DPD was adopted in 2013 and so was found sound in the context of and with reference to the national guidance set out in the NPPF’.

Housing Need; Paragraph 3.3, Table 3.1, Table 5.1 Paragraph 5.5 and Paragraph 9.2:

Notes Plan makes several references to the provision of a wider range of housing being dependent on delivery of housing outside of the designated Neighbourhood Plan area, namely at Adastral Park. Considers this approach does not take into account the failure of Adastral Park to deliver the anticipated number of homes during the plan period (now 1,575 in the plan period). Considers it is not proactive to rely on the Site Allocations DPD to address housing need, especially given that this DPD did not cover significant sections of the most sustainable areas of the District, such as the Martlesham Neighbourhood Area, which should also play its part in delivering the homes required. Considers the Neighbourhood Plan should be proactive and find potential sites that could sustain suitable development. Notes in this context the 7,900 (Core Strategy) housing requirement figure is a minimum.

Table 5.1: Table 5.1

Considers that setting out that ‘limited infill can be the principle form of development’ is not a reasonable or sound approach in the existing policy context. The Neighbourhood Plan should be more proactive in securing the delivery of sufficient homes and so meeting the requirement of paragraph 47 of the NPPF to ‘boost significantly the supply of housing’.

Table 3.1:

Notes Table sets out the various criteria of the Neighbourhood Plan vision but implies these should be met ‘by community input to the CEG masterplan’ and ‘By community and Parish Council activities’. Notes the preceding paragraph 3.6 indicates that actions by the Parish Council and community groups are separate to the Neighbourhood Plan. Considers Table 3.1 should therefore be updated to make clear that the Neighbourhood Plan is required to and will deliver its own Vision. Is of the view that otherwise it undermines its own purpose.

Para 5.3 and MAR4:

Notes paragraph 5.3 indicates that *‘the majority of people considered that this character meant relatively low density development, even if this meant using more land to accommodate development’*. Considers this undermines the ability to rely solely on ‘infill development’ as this approach significantly limits opportunities to ensure that the land is used effectively. Notes also that whilst density matters are not specifically incorporated within policy MAR4, there is sufficiently broad criteria within this policy (such as the first bullet point) to justify consideration of this supporting text by decision makers. Considers it hard to establish where *‘more land to accommodate development’* fits comfortably with other aspects of the Neighbourhood Plan when no additional allocations for housing are included and undue restriction is applied to Areas to be Protected from Development.

Healthcare Provision – Paragraphs 4.48, 4.20; Policy MAR3; Paragraph 6.11 and paragraphs 6.29 – 6.32:

Considers reference to encouraging opportunities to retain or extend the existing GP surgery to be reasonable. However, considers current wording to run counter to NPPF, notably paragraph 14 and the presumption in favour of sustainable development.

Notes outline planning application for Adastral Park as submitted includes a primary local centre with capacity for D1 uses. Considers there is consequently sufficient certainty that this could be delivered if demand requires. Also notes the theoretical expansion of the GP surgery at the Square is not reliant on additional land as noted at paragraph 6.30 where *‘The owners of the village centre buildings have stated that there is potential to expand it either within the existing building or by extending onto the adjacent land’*. On this basis considers there are clearly sufficient alternative options and means of provision (including the utilisation of space within the existing building that already houses the surgery, subject to tenancy changes) so as to not warrant this undue restriction. Considers that whilst the policy can have reference to encouraging opportunities for healthcare facilities within the District Centre this should not be at the expense of alternative opportunities that may be just as warranted or beneficial.

Considers purpose of paragraphs 6.29 – 6.32 to be unclear. Notes the detail on access to health facilities is not translated into a policy so does not adequately steer development.

also notes it is unclear where the statistics relating to modes of travel have been sourced.

Paragraph 6.30

Suggests Neighbourhood Plan priorities are based on responses to the Neighbourhood Plan rather than discussions with the health care providers themselves. Suggests reference to discussions held with service providers should be clarified or if not undertaken, should be held at the earliest opportunity. Notes paragraph also runs counter to a number of policies within the submission version of the Neighbourhood Plan eg MAR13 and MAR2. Is of the view that if all three policies were adopted in their current form there would be no physical scope to physically expand the surgery at the District Centre to the south or east. Suggests policy MAR3 and supporting text should not restrict alternative development opportunities at the District Centre although encouragement of certain uses such as primary healthcare facilities may be referenced.

Notes paragraph expresses reservations with residents relying on primary healthcare facilities at Adastral park due to the potential distance for existing residents. Elsewhere there are numerous references to the capacity and potential for the existing and future communities to share serves within Adastral Park. Notes it therefore seems reasonable to assume that this applies to all facilities, including healthcare.

Image page 23 View from Eagle Way towards Martlesham Heath village centre.

Image title is incorrect. It is actually taken from Lancaster Drive.

Areas to be Protected from Development. MAR2 and Paragraph 4.17:

Considers Policy MAR2 to be reasonable reflecting saved policy AP28 which it will supersede. However, considers supporting text is not a true reflection of the justified basis for the designation. Notes AP28 does not establish any particular *uses* as appropriate or otherwise. Instead the test falls to whether the development may have detrimental impacts on the character, spacing or density of a particular area. Based on a site specific appraisal it is possible that any particular use or type of development may not have impacts on these criteria and so not result in the material detractor identified in the policy. Considers that providing the additional assumption and reference to particular uses goes beyond the intention of the policy on which it is based. Suggests paragraph 4.17 is updated to better reflect the original basis established in policy AP28 or policy AP28 not be used as the basis for MAR2.

Considers a review of the extent of Areas to be Protected from Development would help facilitate the delivery of additional residential development. Notes specifically that land to the east of The Square, Martlesham Heath has the potential to accommodate around 10 homes. Thinks the Neighbourhood Plan should revisit opportunities for specific allocations.

MAR12:

Notes allotments fall within the definition of 'leisure and community facilities and are so identified on the CIL 123 list.

Considers the policy in terms of community growing spaces is too broad. Suggests include a minimum threshold within the policy below which all parties agree such provision is not feasible or viable.

MAR13:

Considers policy conflicts with NPPF as currently drafted. The extremely restrictive approach overlooks the need to take into account the non designated status of the assets. Suggests policy is updated to reflect national policy guidance incorporating reference to the need for a balanced judgement in considering loss of any such assets.

Suffolk County Council (SCC)

Outlines services and areas of responsibility which fall to the County Council. Notes comments focus on matters relating to those services.

Is supportive of the Martlesham Neighbourhood Plan vision. Acknowledges that the plan has addressed the issues raised by at the pre-submission stage but notes a number of outstanding concerns.

MAR13 Non-Designated Heritage Assets:

Notes SCC is unable to implement this policy in the way the NP intends as it is not in accordance with paragraph 135 of NPPF. Notes it is not clear what evidence has been used to identify the significance of the assets listed. Considers the issue could be resolved by rewording the policy to be less strict allowing for balanced judgement based on the scale of harm or loss and the significance of the asset to be made.

Queries the inclusion of Gorseland Primary School. Concerned inclusion may prevent SCC making changes to the school if the educational needs of the local area were to change. On this basis considers inclusion of school means policy does not contribute to sustainable development.

Highways: Figs 7.1 and 7.2 Traffic flows.

Seeks clarification as to what evidence has been used to prepare these diagrams. Notes it is understood that they have been developed to identify the locations which are considered relevant for the consideration of the Adastral Park planning application. Confirms that SCC will assess the highway implications of the Adastral Park proposal based on evidence submitted as part of the application.

MAR 16 Parking Standards: Welcomes the commitment to the adopted countywide guidance. However, considers the clause relating to permanent availability of garages/car port facilities to be unenforceable. Notes The Suffolk Guidance of Parking (2015) recognises this and sets out size requirements which have to be met for the garage to count towards parking needs. Suggests delete sentence beginning 'Parking provision can take the form..'

MAR17 Parking Provision at Martlesham Heath Retail Park and Business Park.

Welcomes support for SCC approach to parking standards. However, notes policy cannot be used to require that proposals remedy existing problems. It is an established principle of planning that new developments cannot be required to remedy existing infrastructure deficits.

Suffolk Coastal District Council (as Local Planning Authority)**Para 6.25:**

Delete and replace with:-

The society has compiled a comprehensive list of buildings and structures which are related

to this history.

These can be divided into three sections:

1. Records of the sites of structures where no physical evidence remains. No special planning conditions are required for these sites
2. Buildings which have an association with the aerodrome but which do not exhibit any distinguishing features related to this role. Examples of these would be houses in Deben Avenue which were requisitioned as officers' quarters but look like any other house in the street. It was felt that it would be inappropriate to restrict developments of these properties solely on those grounds. As a non-planning matter mechanisms could be found by the community to commemorate the role these buildings played
3. Buildings and artefacts which survive in clearly recognisable form from this period, listed in appendix 2. These are the structures which need special treatment in addition to the protections afforded to them as Non-designated heritage assets within the terms of the National Planning Policy Framework. We believe there should be a strong presumption against the loss of all non-designated heritage assets so that this heritage may be shared with future generations. Within this presumption it is acknowledged that sensitive developments could enhance the value of these assets and therefore policy MAR 13 is designed to allow such developments.

Para 6.27: Remove. Re-number paragraphs 6.28, 6.29 and 6.30.

MAR13 – Re-word to read:

“In addition to the protections offered to non designated heritage assets developments affecting those assets listed in appendix 2 will only be allowed if:

They respect the historical context of the asset

They do not result in the loss of the asset and

Any alterations enhance the value of the asset in aesthetic and educational terms.

Appendix 1: Replace with list of Bowl Barrows.

Appendix 2: Replace with list of heritage assets.