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Planning Policy & Delivery Team,
Council Offices
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9th March 2015

By email to suffolkcoastallocalplan@eastssuffolk.gov.uk

Dear Sir

Re: Woodbridge Neighbourhood Development Plan – Application for Neighbourhood Area Designation

Gladman Developments Ltd specialise in the promotion of strategic land for residential development with associated community infrastructure. This letter provides Gladman's representations on the application made by Woodbridge Town Council for the designation of a Neighbourhood Area, for the purposes of preparing a Neighbourhood Development Plan.

Area Designation

Gladman object to the proposed Woodbridge Neighbourhood Development Plan proposed area designation. Gladman note that the proposed Neighbourhood Plan area largely follows the Town boundary apart from one exception, an area of land to the south west of Woodbridge. The Town Council list a number of reasons for this additional land being included within the Neighbourhood Plan area, providing the justification for not using the existing administrative boundaries.

In this particular instance Gladman support the rationale to extend the neighbourhood plan area beyond the Town boundary, but believe that further additional land should also be included within the area. Gladman submit that the site detailed below (land adjacent to Dukes Park) should also be included within the Woodbridge neighbourhood plan area and considered as a potential residential allocation through the plan preparation process.

Gladman agree with the Town Council that *"in order to be positive about growth, Woodbridge is required to contribute towards the delivery of the overall housing requirement for the five market towns in Suffolk Coastal district."* The Town Council go on to state that the *"area in question provides one possible location for additional*

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growth and therefore it is imperative that it is considered within the context of contributing towards Woodbridge's role as a market town and its associated growth requirements." Gladman submit that the land adjacent to Dukes Park should, for the reason already provided by the Town Council in relation to land to the south west of the settlement, also be included within the neighbourhood plan area, despite falling outside the Town Boundary. This additional area of land effectively forms part of Woodbridge; it lies adjacent to the built form of Woodbridge and benefits from proximity to services and facilities within Woodbridge.

Gladman note, from reviewing both the proposed neighbourhood plan area designation for Woodbridge and Martlesham, that there is an overlap between the two neighbourhood plan areas. Categorically land cannot fall within two neighbourhood plans. It will therefore be up to the District Council to determine which application is successful and which needs to be amended.

Gladman recommend in instances such as this that the Parish/Town Councils should work together to determine the most logical and practical neighbourhood plan areas based on how the settlements currently function and their growth potential. Gladman believe that this would result in the Woodbridge neighbourhood plan area extending beyond its Town boundary into the Martlesham parish (to include both the additional area as proposed by the Town Council and also the land adjacent to Dukes Park). Please see Appendix 1 for a suggested neighbourhood plan area for both Woodbridge and Martlesham. Gladman recommend that the Town Council consider this as an alternative to the current proposal.

Site submission – Land adjacent to Dukes Park, Woodbridge

Gladman have land interests adjacent to Dukes Park, Woodbridge. Gladman consider the site to be suitable, available and deliverable for the development of roughly 200 dwellings. See Appendix 2 for a location plan.

Neighbourhood Plans - Guidance and Legislation

Gladman would like to take the opportunity to comment on the Woodbridge Neighbourhood Area application to highlight a number of key requirements to which the development of the emerging Neighbourhood Plan should have regard. Gladman wish to participate in the Neighbourhood Plan's preparation and to be notified of further developments and consultations in this regard.

Before a Neighbourhood Plan can proceed to referendum it must be tested against the Neighbourhood Plan Basic Conditions, set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 and further detailed in paragraph 065 of the Neighbourhood Plan PPG. These Basic Conditions are:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan*
- b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order*
- c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order*
- d) The making of the neighbourhood plan contributes to the achievement of sustainable development*
- e) The making of the neighbourhood plan is in general conformity with the strategic policies contained within the development plan for the area of the authority*

- f) *The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations*
- g) *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*

If a Neighbourhood Plan is not developed in accordance with the Neighbourhood Plan Basic Conditions there is a real risk that it will fail when it reaches Independent Examination.

The National Planning Policy Framework (The Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out requirements for the preparation of neighbourhood plans and the role these should take in setting out policies for the local area. The guidance set out in the Framework has now been supplemented by the Planning Practice Guidance (PPG) on Neighbourhood Plans.

Paragraph 16 of the Framework sets out the positive role that Neighbourhood Plans should play in meeting the development needs of the local area. It states that:

"The application of the Presumption (In Favour of Sustainable Development, set out in paragraph 14 of Framework) will have implications for how communities engage in neighbourhood planning. Critically it will mean that neighbourhoods should:

- *Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;*
- *Plan positively to support local development, shaping and directing development in their area that is outside of the strategic elements of the Local Plan"*

Further guidance on the relationship between Neighbourhood Plans and strategic policies for the wider area set out in a Council's Local Plan is included in paragraph 184 of the Framework:

"The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date plan is in place as quickly as possible. Neighbourhood Plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood Plans...should not promote less development than set out in the Local Plan or undermine its strategic policies".

Relationship with Local Plans

To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, Neighbourhood Plans should be prepared to conform to up-to-date strategic policy requirements set out in Local Plans. Where an up-to-date Local Plan has been adopted and is in place for the wider authority area, it is the strategic policy requirements set out in this document that a Neighbourhood Plan should seek to support and meet. When a Local Plan is emerging or is yet to be found sound at Examination, there will be lack of certainty over what scale of development a community must accommodate or the direction the policies in the Neighbourhood Plan should take.

Although the Neighbourhood Plan section of the PPG indicates that Neighbourhood Plans can be advanced before an up-to-date Local Plan is in place, Gladman would strongly question the ability to progress a Neighbourhood Plan on this basis. If a Neighbourhood Plan is progressed prior to an up-to-date Local Plan being prepared, or the strategic policies and development requirements set out in an emerging Local Plan change,

then the work on the Neighbourhood Plan is likely to be abortive. A Neighbourhood Plan cannot be consistent with the requirements of the Framework or the meet the Neighbourhood Plan Basic Conditions if it is progressed on a development plan that is out-of-date.

Gladman note that Suffolk Coastal District Council adopted their Core Strategy in July 2013 and have recently undertaken an Issues and Options consultation on their Allocations document.

Neighbourhood Plan Policies and Proposals

In accordance with the Neighbourhood Plan Basic Conditions, Neighbourhood Plan policies should align with the requirements of the Framework and the wider strategic policies for the area set out in the Council's Local Plan. Neighbourhood Plans should provide a policy framework that complements and supports the requirements set out in these higher-order documents, setting out further, locally-specific requirements that will be applied to development proposals coming forward.

The Framework is clear that Neighbourhood Plans cannot introduce policies and proposals that would prevent development from going ahead. They are required to plan positively for new development, enabling sufficient growth to take place to meet the strategic development needs for the area. Policies that are clearly worded or intended to place an unjustified constraint on further sustainable development taking place would not be consistent with the requirements of the Framework or meet the Neighbourhood Plan Basic Conditions.

Communities should not seek to include policies in Neighbourhood Plans that have no planning basis or are inconsistent with national and local policy obligations. Proposals should be appropriately justified by the findings of a supporting evidence base and must be sufficiently clear to be capable of being interpreted by applicants and decision makers. Policies and proposals should be designed to add value to policies set out in Local Plan and national guidance, as opposed to replicating their requirements. The community should liaise with the Council's planning team to seek advice on the appropriateness of the Neighbourhood Plan's proposals.

Sustainability Appraisal/Strategic Environmental Assessment

The preparation of a Neighbourhood Plan may fall under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan's proposals would be likely to have significant environmental effects. The requirement to undertake an SEA will be dependent on a Neighbourhood Plan's proposals, but is likely to be necessary where a Plan is proposing specific allocations or site designations.

In accordance with Schedule 1 of the SEA Regulations, a Screening Assessment of a Neighbourhood Plan's proposals should be completed to assess whether an SEA must be prepared. Where an SEA is required this should be commenced at the earliest opportunity, alongside the preparation of the emerging Neighbourhood Plan, to ensure the Neighbourhood Plan's proposals have been properly considered through the SEA process, and appropriately justified against other reasonable alternatives. Where an adequate SEA has not been undertaken a Neighbourhood Plan is unlikely to meet the Neighbourhood Plan Basic Conditions.

Although Neighbourhood Plans do not require a Sustainability Appraisal (SA) of their proposals, preparing an SA can help to show how a Neighbourhood Plan will contribute to the achievement of sustainable development, a Neighbourhood Plan Basic Condition. Where an SEA is required, extending this assessment to the preparation of an SA is unlikely to require significant additional input.

The Council's planning team will be able to advise on the likely need for an SEA of the Neighbourhood Plan's proposals. To be compatible with EU obligations, further appraisals, such as a Habitats Regulations Assessment, may also be required depending on local circumstances.

Neighbourhood Plan preparation

Gladman would like to be kept informed of progress with the Woodbridge Neighbourhood Plan and any subsequent stages of public consultation. Should you have any queries in relation to our response please do not hesitate to contact us. Gladman would be happy to meet with the Town Council to discuss these representations in further detail.

Yours faithfully






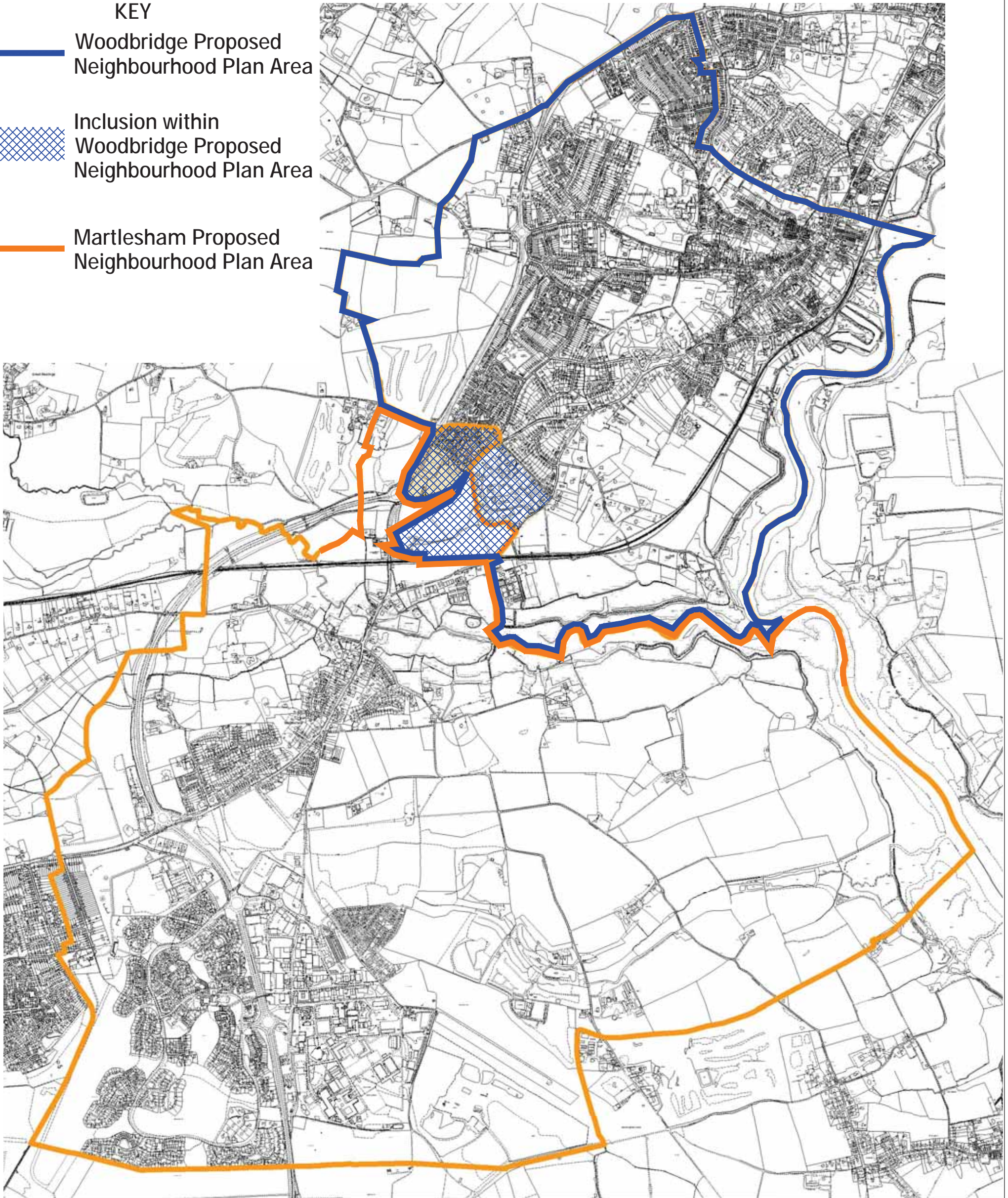
Nicole Penfold
Planner
Gladman Developments Ltd.

cc: chris@woodbridge-suffolk.gov.uk


**Appendix 1: Gladman's recommended Neighbourhood Plan Area Designation
(Woodbridge and Martlesham)**

KEY

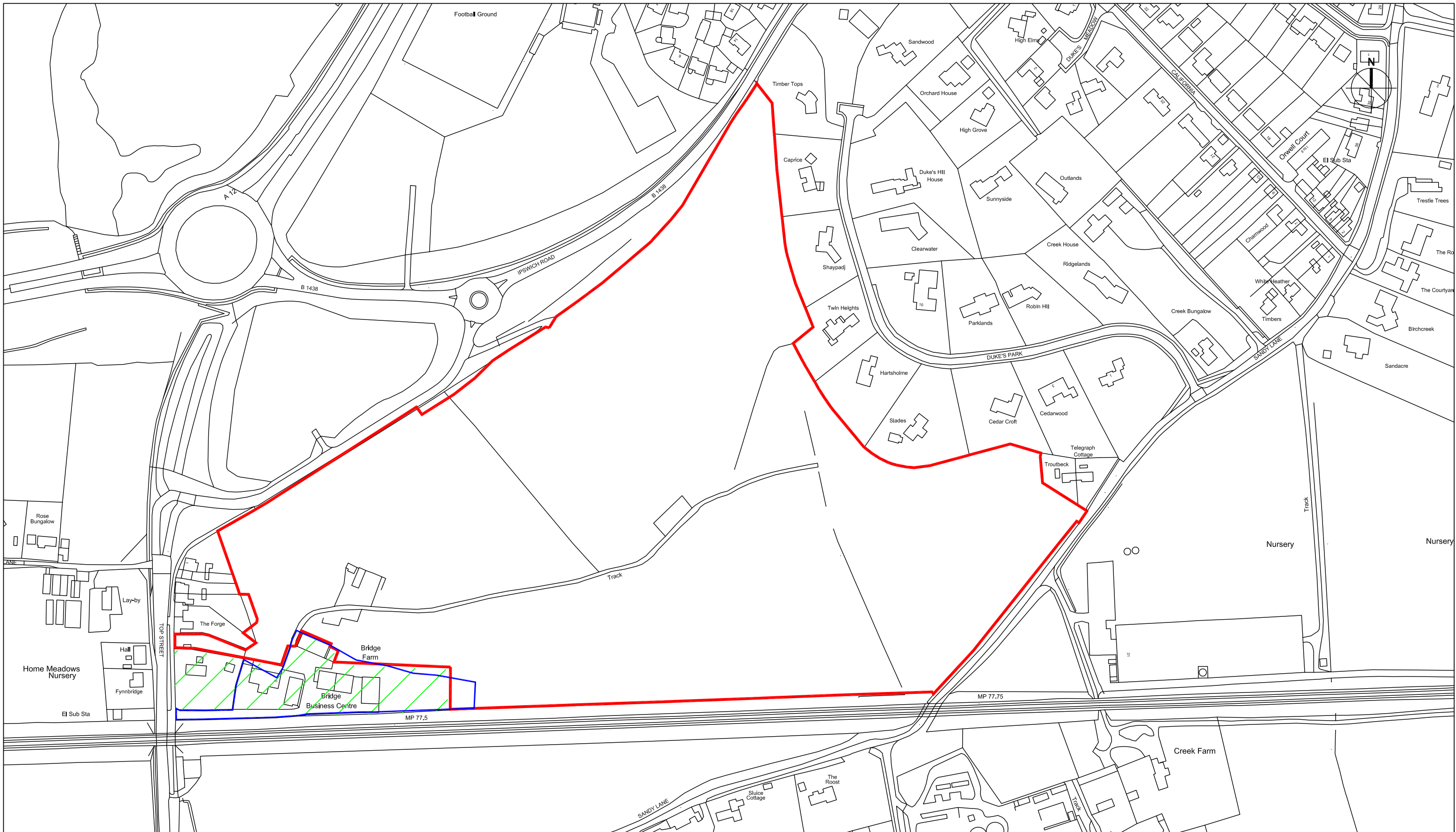

-  Woodbridge Proposed Neighbourhood Plan Area
-  Inclusion within Woodbridge Proposed Neighbourhood Plan Area
-  Martlesham Proposed Neighbourhood Plan Area



This drawing has been produced using information sourced from the Suffolk Coastal District Council Neighbourhood Plan and is for identification purposes only.

 <p>GLADMAN Gladman House, Alexandra Way Copleston Business Park Copleston, Cleethorpe CH12 1JH Tel: 01240 288880 Fax: 01240 288891 www.gladman.co.uk</p>	*	*	*	*	Project WOODBIDGE AND MARTLESHAM PROPOSED NEIGHBOURHOOD PLAN AREAS	Drawn by SB	Issue date 09.03.2015
	Rev Date By Revision notes					Title GLADMAN RECOMMENDED AMENDMENTS TO PROPOSED NEIGHBOURHOOD PLAN AREAS	Scale(s) NTS
INFORMATION							

Appendix 2: Location Plan – Land adjacent to Dukes Park, Woodbridge

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Rev	Date	By	Revision notes
D	07.01.15	SB	Hatch area indicated Alterations to site boundary
C	10.12.14	ET	
Status			LEGAL

Project	2014-019 WOODBRIDGE
Title	LOCATION PLAN

Drawn by ET	Issue date 06.10.14
Scale(s) 1:2500@A3	
Drawing No 100-101	