

Attn: Mr Conor Crowther  
Planning Policy and Delivery Team (Neighbourhood Plans)  
East Suffolk House  
Station Road  
Melton  
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IP12 1RT

*Submitted via Email: [suffolkcoastallocalplan@eastssuffolk.gov.uk](mailto:suffolkcoastallocalplan@eastssuffolk.gov.uk)*

17 August 2017

Our Ref: 13/2035

Dear Sir/ Madam,

#### **MARTLESHAM NEIGHBOURHOOD PLAN**

On behalf of our client, ALDI Stores Ltd (ALDI hereafter), please find enclosed representations on the Martlesham Neighbourhood Plan Submission Stage Consultation document, dated May 2017. These representations follow our previous comments dated 27<sup>th</sup> January 2017 on behalf of ALDI in respect of the Pre-submission Consultation Document (November 2016).

#### **ALDI's interest in Martlesham**

ALDI submitted a planning application to Suffolk Coastal District Council (SCDC) in January 2017 for a new neighbourhood ALDI food store at Gloster Road which is currently pending consideration (LPA Reference: DC/17/0055/FUL). The proposals will secure a high quality, contemporary development, creating up to 50 new local jobs which is entirely in keeping with the retail and commercial character of the surrounding area. Crucially, the development will finally secure a substantial economic development solution for the site that has been redundant and providing no economic output for many years. The proposals if granted will ensure the site starts to contribute to the local economy as soon as possible.

In the spirit of Localism, ALDI extensively publicised the proposal locally via a community leaflet drop in late 2016, which received phenomenal support, with almost 90% of respondents welcoming the scheme. This local support has also continued through to the planning application stage with nearly 900 comments received by SCDC supporting the application.

ALDI are still keen to continue to work with Martlesham Parish Council during the planning process and beyond and wish to make the following comments on the Submission Consultation Version document:

#### **Policy MAR3 'Development in Martlesham Heath' and Figure 4.1**

Policy MAR3 and Figure 4.1 have been amended since the last round for consultation to remove the two suggested development sites on the edge of Martlesham Heath District Centre to the north and south of Eagle Way. For completeness, as part of ALDI's current planning application the sequential assessment thoroughly reviewed and discounted these sites as 'unavailable' and 'unsuitable' for ALDI's proposed development. These sites have now been deleted from the Plan, reflecting

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ALDI's own research. In terms of the Martlesham Heath residential area, given the application site's links and proximity to the District Centre, it is the only site available and suitable for the proposed development, therefore satisfying the sequential approach.

### Policy MAR18 'Martlesham Heath Retail Park'

ALDI **object** to this new policy as currently worded as no evidence base is included to support its inclusion. The policy is ambiguous with no plan referred to within the policy to designate the boundaries of the retail park, unless we assume the area shown in Figure 2.1 is to be applied. This omission leads to ambiguity when trying to interpret this policy and should be amended to provide certainty to applicants. This policy sets out a presumption to direct new *"supermarket and 'large format' retail which is only suitable for out-of-centre locations"* (para 8.9) to the retail park area if the two criteria set out are satisfied - the sequential approach and impact considerations. This in effect is designating the retail park as a retail centre in addition to those centres listed in the retail hierarchy set out under Suffolk Coastal Local Plan Strategic Policy SP9.

ALDI's application site is more accessible to Martlesham Heath District Centre than the Retail Park area, therefore this policy does not meet the requirements of the sequential test of the NPPF and does not support sustainable economic development. We therefore suggest the following amendment to the first bullet point within the policy:

- "The nature and scale of the retail provision cannot be supported 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"

On this basis, ALDI's application site should be allocated for retail development as it satisfies the sequential test.

The second part of policy MAR18 requires the impact of the development to be considered however no threshold for conducting a retail impact assessment is set out. As read currently, it is assumed the NPPF's threshold of 2,500 sqm would be applied to future retail development given the absence of an adopted RIA threshold in SCDC's Development Plan. ALDI support this as a proportionate threshold given the scale of retail units locally, however this should be clarified within the policy or the supporting text.

### Policy MAR19 'General Employment Areas'

As set out in ALDI's previous representations, the application site is identified within the Martlesham Heath 'General Employment Area' therefore draft policy MAR19 'General Employment Areas' will be applicable to the site once adopted. Despite previous representations, this policy has not been amended following the concerns raised.

As currently drafted this policy is not in accordance with the NPPF and does not reflect what is occurring on the ground in the area. Much of the land to the west of Gloster Road comprises a mix of uses including A, B, D and sui generis uses as shown on the attached plan, therefore greater flexibility to support a range of uses compatible with the existing uses in this area should be allowed. If the Council feel it necessary, the land to the east of Gloster Road can be subject to a more prescriptive policy such as this, as it is dominated by more B class uses.

This approach is more reflective of the NPPF and the definition of 'employment' uses suitable under draft policy MAR19 should be amended, especially in respect of land to the east of Gloster Road, to reflect the NPPF's definition of 'economic development' which recognises main town centre uses as employment generating development - see annex 2 glossary of NPPF. At present, no definition of 'employment' is supplied.

### Summary and Conclusions

We trust that our representations will be given full consideration through the remainder of the consultation process and that our details will be included on the Council's database to ensure we are notified of all future stages of this document. We wish to remain fully involved at every stage in the preparation of the Parish Council's Neighbourhood Plan.

It should be noted that our views represent our considered opinion at this time, based upon the Submission Consultation Version Document (May 2017). We respectively reserve the right to make further comments throughout the planning process.

We would be grateful for confirmation of receipt of the representations.

Yours sincerely,

Alastair Close

Director

**Planning Potential**

London

Enc.