

8 August 2017

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



Our Ref: 10123 Martlesham Heath

Dear Mr Crowther,

Martlesham Neighbourhood Plan Submission Stage (Regulation 16) & Supporting Statements

Thank you for your email of 7th July 2017 invited comments on the Martlesham Neighbourhood Plan: Submission Stage May 2017, and Supporting Statements. Our client, Max Industrial GP Ltd and Max Industrial Nominees Ltd (who hold in trust for Max Industrial 2 LP), has asked PRC to respond accordingly. As such we provide the following comments and enclose our formal response to the Plan and the Council response to our earlier comments.

Martlesham Neighbourhood Plan Submission Stage (Regulation 16) & Martlesham Neighbourhood Plan: Consultation statement May 2017

We attach further comments addressing the Councils response to the initial round of consultation and set down the relevant section that requires changing in the Submission State document.

Martlesham Neighbourhood Plan Strategic Environmental Assessment & Habitat Regulations Screening Determination

No comments.

Martlesham Neighbourhood Plan Basic Conditions Statement

No comments.

Martlesham Neighbourhood Plan List of Evidence

No comments.

To re-iterate one point made on a number of occasions. Whilst it is acknowledged that individual companies may have been approached to take part in formative discussions on the Neighbourhood Plan, our client, as the owner, manager, and strategic liaison point for the future of the Martlesham Heath Business Park, was never approached. Please ensure that any future meetings, discussions etc. regarding the Neighbourhood Plan which involve the future of MHP between the local coordinating groups and/or the Council involve our client.

Should you require further clarification of any points made please do not hesitate to call me.

Yours sincerely

For and on behalf of PRC Architecture & Planning Limited

Andy Ryley

Senior Associate Director

Para/Page No – Original Submission	Original Consultation Text Issue	Initial Response	Additional Response to LPAs comments in May 2017 Consultation Statement into the Martlesham Heath Neighbourhood Plan
Para 1.6 Page 2	<i>"Against this backdrop it was felt that a Neighbourhood Plan could help shape the new developments and integrate them with the existing settlements, and at the same time help to preserve the separate characteristics and amenities that already exist. The vision statement reflects this."</i>	AGREE – however, the management of the MHBP would wish to be closely involved in the process as they are a key part of the neighbourhood and insofar as the Plan relates to the MHBP.	No additional comment
Paras 1.8-1.14 Pages 2 and 3	References to the Neighbourhood Plan area and Adastral Park inclusion	MHBP supports view of the MNPG that Adastral Park should be included within the area in order to allow greater cohesion between Adastral Park, the MHBP and the wider neighbourhood plan area, and better integration of policies	No additional comment
Para 2.4 Pages 7 and 8	References to the history of Adastral Park and the village of Martlesham Heath but not to the history of MHBP	History and aspirations of MHBP should be included as follows: 'MHBP began developing as an industrial estate in the years following the closure of the airfield in 1963? The business park now comprises some 4.6ha of employment land and is currently asset managed by Logikor Europe Ltd on behalf of the landlord Max Industrial GP Ltd and Max Industrial Nominees Ltd (who hold in trust for Max Industrial 2 LP). Logikor has sought to enhance its asset despite the extremely difficult economic climate. The amount of let employment floorspace has increased from 2009-present day by some 29,000sqm with over £1.5m capital invested. The current owner has aspirations for MHBP which include the development of small business start-ups, and continuing to accommodate these businesses once they succeed and grow, and to strengthen the appeal of the site by providing support services to help retain existing and attract new tenants.'	NP policies cannot now be adjusted as Adastral Park not included in the first place - No additional comment
Para 2.8 Page 8	Additional text should be inserted to reflect the A12 separation	Insert: '.....well integrated, although it is recognised that there is a significant physical separation resulting from the A12 Trunk Road bisecting the neighbourhood plan areas.'	No additional comment
Para 2.13 Page 11	Reference in the 8 th line down is inaccurate regarding the catering of local services for customers from a wider geographical region	Remove: '.....and the units in the industrial park' – whilst the Retail Park serves a wider area, the MHBP services are local facilities catering for uses of the MHBP - this was established through the planning process. The A12 is a significant barrier separating the Martlesham Heath village centre and MHBP – it contributes to the acceptability and success of the two different areas of smaller retail units – one to serve the residential areas to the west of the A12: the other serving the employment units to the east of the A12.	Concern that reference to the industrial park has been retained on the basis that 'concerns have been raised over the impact on the district centre' but no evidence being provided to support these concerns. Would request again that the wording '.....and the units in the industrial park' be removed from paragraph 2.16 page 9 of the Martlesham Neighbourhood Plan Submission Stage Consultation Version May 2017

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Para 2.14 Page 12	December 2014 industrial survey	Whilst a number of the individual businesses may have been informally approached by ward Councillors there is no record of a formal approach to the owners of the estate despite a request being made in writing to this effect which is disappointing given the major role MHBP plays in the local employment area. 5 th line of para insert: '....Retail Park, Martlesham Heath Business Park including light industry,.....leisure facilities and small local services, and Adastral Park'	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, <u>was not</u> approached <u>despite</u> a request being made in writing to this effect which is disappointing given the major role MHBP plays in the local employment area. '..and small local services...' does not appear to be added in text as stated. This should be inserted in paragraph 2.17 page 9 of the Martlesham Neighbourhood Plan Submission Stage Consultation Version May 2017
Para 2.16 Page 12	The nos. of businesses conflicts with those in para 8.2	The correct number is 160. The document should be adjusted accordingly to reflect this.	No additional comment
Table under para 2.17 page 12	'Industrial Areas' table refers to 'inadequate parking' in first point under 'weaknesses to be addressed'. This conflicts with para 8.2 survey last bullet where it refers to parking being an 'insignificant problem' and para 8.3 5 th bullet where it refers to 'a substantial number of free parking spaces' and '...local companies indicated that parking for both their customers and employees presented no problems.'	The document needs to be consistent in its approach. The inadequate parking is a problem primarily associated with the retail park	No additional comment
Open spaces section	n/a	n/a	No additional comment
Para 2.28 Page 16	No mention is made of the recent appeal decision regarding the hotel, pub/ restaurant and drive thru.	Insert after last bullet point: 'MHBP has a consent for the building of the hotel, pub/restaurant and drive thru recently won on appeal at the gateway sites to MHBP which would provide additional facilities.'	No additional comment
Para 3.1 Page 18	Vision statement	MHBP support the positive vision set out	No additional comment
Table under para 3.2 page 18	There is a need to also support the retention of existing business which should be reflected within point 2 of this table	Insert in point 2: '.....to encourage the retention, creation and success.....'	No additional comment
Para 3.6 Page 20	Under traffic bullet point, 2 nd bullet point refers to 'road inadequacies'. Unclear as to what this means.	Clarity should be provided as to what 'road inadequacies mean, or are.	No additional comment
Table 3.1 Page 22	Under point 2, 3 rd column 'industrial areas' the 'Y' is missing.	Insert 'Y' under point 2, 3 rd column.	No additional comment
Policy Mar1 Page 24	Martlesham Physical Limits Boundaries	Support with the exception of Adastral Park which should be included.	No additional comment
Policy Mar2 Page 29	Areas to be Protected from Development	Support	No additional comment
Policy Mar3 Page 29	Development within Martlesham Heath	Support	No additional comment
Policy Mar4 Page 31	Residential Design and Amenity	Support insofar as more residential will positively affect the need and provision of jobs and requirements for more commercial uses within MHBP.	No additional comment

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Para 5.8-5.11 Pages 36-38	Housing Needs	Consideration should be given to the identification of suitable sites for care homes and extra care villages with the substantial rise in the ageing population and need to release family home nos. The employment levels attributed to this care use, together with the proximity to local services provision, would mean the MHBP would be a suitable location for such a use, albeit not a 'B' use class.	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 still available and suitable location for extra care/ care home accommodation for the elderly and should be investigated.
Policy Mar5 Page 39	Residential Mix	Support but should be more specific in its approach to care for the elderly. Insert after last bullet point: <ul style="list-style-type: none"> • Care Home • Extra Care Accommodation Also, consider additional para to read: 'Consideration will also be given to the provision of extra care accommodation on land currently zoned for 'B' use where suitably located.'	See point above. Also, housing provision for the elderly is as housing issue and should be addressed. It is a requirement to provide sites for housing for the elderly in the development plan. New paragraph in the housing section referring to need for such accommodation for the elderly and consideration will also be given to the provision of extra care accommodation on land currently zoned for 'B' use where suitably located.
Policy Mar6 Page 40	Residential House Boats	n/a	No additional comment
Policy Mar7 Page 42	Local Gaps	n/a	No additional comment
Policy Mar8 Page 43	Special Landscape Areas	n/a	No additional comment
Policies Mar9/10 Page 45	Existing Community and Leisure Uses/ Provision of Additional Leisure Uses	The migration out of Martlesham Heath for indoor sports and leisure referred to in para 6.10 could potentially be stopped. Whilst the Adastral Park proposal is a potential location, opportunity exists to improve and expand the existing leisure facilities on MHBP, and provide new opportunities; such existing uses currently provide a diversity of employment opportunity which could be expanded. Insert at the end of the 2 nd para of Policy Mar10 to read: '.....to be provided, and could include the use of current employment land in suitable locations to provide a diversity of employment types.'	Adjusted in part - No additional comment
Policy Mar11 Page 47	Children's Play/ Youth Facilities	Support – reference should be made to the soft play, bowling alley and skate park on MHBP as well as Martlesham Leisure and also a private training gym with boxing	Noted NP addressing public not private leisure space - No additional comment
Policy Mar12 Page 48	Allotments and Community Growing Spaces	n/a	No additional comment
Policy Mar13 Page 50	Non-Designated Heritage Assets	n/a	No additional comment
Para 7.2 Page 51	MHBP and the Retail Park need to be included in the sentence.	Insert: '.....side of the A12 and Martlesham Village, Martlesham Heath Business Park, Martlesham Heath Retail Park, and the rural.....'	No additional comment
Para 7.3 Page 52	The first sentence incorrectly states that the MHBP provides many of services that residents use.	Insert a full stop after '...the A12.' Then start a new sentence 'The Retail Park provides.....'	No additional comment
Policy Mar14/Page 61	Cycling/Walking and Disability Access Routes	Support	No additional comment

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Policy Mar15 Page 62	Cycling Walking and Disability Access in Martlesham Heath Business Park	Support	No additional comment
Policy Mar16 Page 64	Parking Standards	Support	No additional comment
Policy Mar17 Page 66	Parking Provision at Martlesham Heath Retail and Business Parks	Support	No additional comment
Para 8.1 Page 67	MHBP involvement in survey of industrial areas	Whilst a number of the individual businesses may have been informally approached by ward Councillors there is no record of a formal approach to the owners of the estate despite a request being made in writing to this effect which is disappointing given the major role MHBP plays in the local employment area.	Refer to point made earlier – owner/ manager and strategic coordinator of the MHBP was not approached and should be in all future correspondence/ discussions over the future of the area.
Para 8.2 Page 67	Inconsistencies in nos. of businesses	Refer to previous comment in Para 2.16 Page 12	No additional comment
Para 8.3 Page 68	5 th bullet point states ' <i>there are a substantial number of free parking places</i> ' and that ' <i>a significant number of local companies indicated that parking for both their customers and employees presented no problems.</i> ' Elsewhere in the document parking is considered a problem that needs to be resolved?	Clarity and consistency through the document is required as to whether there is or there is not a parking problem in MHBP as the confusion may put potential companies off from coming to the MHBP.	No additional comment
Para 8.6 Page 69	The para also refers to retail businesses in Martlesham District Centre raising concerns about 'the expansion of large scale retail outlets' at the MH Retail Park that are in direct competition with existing businesses in The Square e.g. the bakery and hairdressers.	<p>Firstly, the bakery and hairdressers on MHBP are not in the Retail Park so unless there are a bakers and hairdressers in the Retail Park this is erroneous statement.</p> <p>Secondly, the bakers and hairdressers at MHBP are no 'large scale retail outlets'.</p> <p>Thirdly, the baker and hairdressers are not competition for The Square – they serve the local business community on MHBP as established through the planning process which enabled them to be developed.</p> <p>Remove reference to the bakery and hairdressers.</p>	<p>The NP May 2017 Consultation response stated that '<i>...whilst the intention of the provision is not to compete but to serve the needs of the businesses there, the fact is that they do.</i>' This is an assumption and no evidence is provided to support the statement 'of fact that they do.'</p> <p>This is erroneous and reference to bakery and hairdressers as no evidence of competition provided.</p> <p>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 on page 59.</p>
Para 8.6/ Page 69	The first sentence refers to ' <i>wider local authorities</i> '	Clarity is required as to which ' <i>wider authorities</i> '.	No additional comment
Para 8.7 Page 69	Refers to 'some of the commercial ventures' being concerned about the commercial viability being diluted due to industrial uses being replaced with retail trades.	<p>The aim of the management of the MHBP is not to dilute the commercial viability but rather to strengthen it with local services associated and directly aimed at supporting the commercial operators on the site and to attract further investment from existing and new commercial ventures to the area being able to provide a fully serviced business park.</p> <p>There needs to be further clarity in the document regarding the clear distinction between the Retail Park and the MHBP – the two are separate both in terms of use and ownership.</p>	No additional comment

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Policy Mar18 Page 70	General Employment Areas	Support	No additional comment
Policy Mar19 Page 71	Sandy Lane, Martlesham	Support	No additional comment
Policy Mar20 Page 74	High Speed Broadband	Support	No additional comment
Page 80	Unclear what is meant by 'improve coordination of fragmented interest at MH Retail and Business Parks' means	Clarity required.	In Table 9.1 of the May 2017 'Martlesham Neighbourhood Plan Submission Stage Consultation Version' under 'Road Inadequacies' the referred text has not been clarified and needs to be. Clarify meaning of 'fragmented interests' in column 3 Road Inadequacies, Table 9.1 page 65.