

15 August 2017
CAPL/392700/A3/CM



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

Claire Mills BA (Hons) MSc MRTPI

Unex House
132-134 Hills Road
Cambridge CB2 8PA
T: +44 (0) 1223 347 000
savills.com

Dear Mr Crowther

RE: REPRESENTATIONS TO THE SUBMISSION VERSION OF THE MARTLESHAM NEIGHBOURHOOD PLAN

On behalf of Grainger plc, Savills (UK) Ltd has been asked to submit representations to the submission version of the Martlesham Neighbourhood Plan. Grainger plc purchased BPT Ltd and so has freehold interest in the locality with the associated covenants on the existing properties at Martlesham Heath. These representations consequently seek to provide comment on the future growth and policy intentions for the area.

The representations are set out under relevant subheadings with reference to particular paragraphs and policies of the Neighbourhood Plan to ensure clarity.

Paragraph 1.1

Paragraph 1.1 refers only to the Core Strategy as the 'other part' of the Development Plan being relevant to the designated neighbourhood plan area. However, this is not the case. Certain saved policies of the Suffolk Coastal Local Plan (First and Second Alterations) will remain relevant and not superseded by the Neighbourhood Plan unless expressly stated. For instance, saved policy AP59. It is therefore suggested that paragraph 1.1 should also refer to saved policies of the Local Plan (First and Second Alterations) when referring to relevant components of the Development Plan.

Paragraph 1.17

Paragraph 1.17 states that the Core Strategy is up to date. However, this does not take into account other matters and triggers that can render a policy document either wholly or partly out of date. For instance, the five year housing land supply position and the fact that Policy SP2 of the Core Strategy required an early review (with Issues and Options meant to have been undertaken by 2015 at the latest). This has not been completed and so undermines the position of the Core Strategy being 'up to date'.

It is therefore proposed that paragraph 1.17 is amended to make clear that the Core Strategy was Examined and found sound in the context of the NPPF, which seems to be the intention of paragraph 1.17. Suggested wording is 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

The Martlesham Neighbourhood 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. However, this approach does not take into account the failure of Adastral Park to deliver the anticipated number of homes during the plan period. For instance, at the time that the Core Strategy was adopted, the trajectory indicated that all 2,000 homes would be delivered at Adastral Park in the plan period to 2027. At the time the Site Allocations DPD was adopted in January 2017, the figure had reduced to 1,575 units in the plan period. However, the latest trajectory within the Council's Housing Land Supply Assessment (June 2017) indicates this has further reduced to 1,300 units. It is not considered 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.

The Council's settlement hierarchy (policy SP19 of the Core Strategy) makes clear that the Eastern Ipswich Plan Area (into which the Neighbourhood Plan area and Adastral Park fall) is a Major Centre and the highest level of sustainability and expected to sustain 29% of the District's required housing growth. It is therefore suggested that in light of the known delays in delivering the much needed housing within this highly sustainable area over the plan period, alternative provision within the area should be allocated to make up for this shortfall. Whilst the Site Allocations DPD has been adopted, this excludes the Martlesham Neighbourhood Plan area. It is therefore for the Neighbourhood Plan itself to be proactive and find potential sites that could sustain suitable development. This is in the context that the 7,900 requirement figure is a minimum.

Table 5.1 of the Neighbourhood Plan is not considered a positive approach for the delivery of housing. Whilst the Table makes reference to the approach summarised in Table 4.2 of the Core Strategy, this does not take into account the failure of Adastral Park to deliver the anticipated rates. It is therefore considered that the Neighbourhood Plan should make reference to this and seek to encourage sustainable growth within this location, which is at the top of the settlement hierarchy. Setting out that 'limited infill can be the principle form of development' is not considered a reasonable or sound approach in the existing policy context and 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'.

It is also noted that Table 3.1 does not appear adequate. The 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'. The preceding paragraph 3.6 indicates that actions by the Parish Council and community groups are separate to the Neighbourhood Plan. It is therefore considered that Table 3.1 should be updated to make clear that the Neighbourhood Plan is required to and will deliver its own Vision. Otherwise it undermines its own purpose.

Paragraph 5.3 and MAR4

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'*. This further undermines the ability to rely solely on 'infill development' as this approach significantly limits opportunities to ensure that the land is used effectively. 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. It is also hard to establish where *'more land to accommodate development'* fits comfortably with other aspects of the Neighbourhood Plan where no additional allocations for housing are included and undue restriction is applied to Areas to be Protected from Development (see reference to later subheadings).

It is suggested that the Neighbourhood Plan should include some allocations of land for housing, without which this lower density character that is of importance to local residents would be difficult to facilitate, whilst still providing opportunities for sufficient housing to come forward.

Healthcare Provision

Paragraph 4.18, Paragraph 4.20, Policy MAR3, Paragraph 6.11 and Paragraphs 6.29-6.32

The submission version of the Neighbourhood Plan has included additional reference to the approach to healthcare provision, most notably relating to the GP surgery at 'The Square' in Martlesham Heath. Whilst reference to encouraging opportunities to retain or extend the existing GP surgery are considered reasonable, it is not considered appropriate for the Neighbourhood Plan to be unduly prescriptive or restrictive. For instance, the Neighbourhood Plan restricts development opportunities at paragraph 4.20 and within policy MAR3 by stating:

'Any decision about the use of this land should not be taken until the strategy for future GP services in the area has been determined (which in turn is related to the proposals at Adastral Park). This is to prevent the option of extending the existing surgery being ruled out before the foregoing strategy has been finalised'.

'...Any development proposals must demonstrate that they have comprehensively engaged with the Clinical Commissioning Group in respect of the existing primary healthcare facility and that the proposals do not eliminate the potential for expansion of the existing healthcare facility until such time as it has been determined 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'.

The above wording is considered to run counter to the NPPF, most notably paragraph 14 and the presumption in favour of sustainable development. For plan making this means *'local planning authorities should positively seek opportunities to meet the development needs of their area'*. The approach taken by the Neighbourhood Plan is by no means a positive policy approach or a justifiable restriction in the circumstances. It is deemed unreasonable to seek the preservation and policy protection of this area on the basis of a *'potential for expansion'*. An outline planning application for Adastral Park has already been submitted and includes a primary local centre with capacity for D1 uses. There is consequently sufficient certainty that this could be delivered if demand requires. Furthermore, 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'*. It is not considered that other development opportunities that may well meet alternative development needs of the area would restrict or fundamentally hinder the adequate healthcare provision for the area. 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. Such an approach fails to *'positively seek opportunities to meet development needs'*. Whilst it is agreed that in this situation, the policy can have reference to encouraging opportunities for primary healthcare facilities within the District Centre, this should not be at the expense of alternative opportunities that may well be just as warranted or beneficial to meet the social, economic and environmental aims of sustainable development.

The purpose of paragraphs 6.29-6.32 is unclear. This detail on access to health facilities is not translated into a policy. It is therefore not considered a relevant inclusion into the Neighbourhood Plan as it does not adequately steer development, instead making hints at political preferences rather than a detailed development management intention. It is also unclear where the statistics relating to modes of travel have been sourced from to appreciate their accuracy or validity. A further footnote is required if these statistics are to be used.

Paragraph 6.30 is also noted. This suggests that the Neighbourhood Plan priorities are based on responses to the Neighbourhood Plan rather than discussions with the health care providers themselves. It is not considered effective for the Neighbourhood Plan to refer solely to opinion of local residents. Whilst this is of course important in the plan development, it should also be influenced by a broader understanding of what service providers intend. Providing a Plan that may run counter to strategic objectives or intentions does not benefit any party and undermines the delivery of realistic mitigation and service provision. It is suggested that reference to discussions held with service providers should be clarified or if not undertaken, should be held at the earliest opportunity.

Paragraph 6.30 (whilst not a policy) also runs counter to a number of policies within the submission version of the Neighbourhood Plan. For instance, reference to *'A number suggested the current surgery could expand onto the adjacent land (which is under different ownership)'*. However, this suggestion does not take into account draft policy MAR13 which restricts development on non-designated heritage assets, MAR2 which restricts development on areas to be protected from development and MAR3 which states that car parking for the village centre should remain. It is therefore clear that if all 3 of these policies were found sound and 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 in any event. The implications of these policies when read as a whole need further attention.

In light of the above comments, it is suggested that draft policy MAR3 and the supporting text should not restrict alternative development opportunities at the District Centre. Whilst encouragement of certain uses such as primary healthcare facilities can be referenced, this should not preclude alternatives and should not delay sustainable alternatives coming forward when an opportunity arises. Comments in relation to MAR2 and MAR13 are provided later within this letter to ensure that sustainable development is not unduly restricted.

Connectivity with Adastral Park **Paragraph 6.30**

Paragraph 6.30 expresses reservations with residents relying on primary healthcare facilities at Adastral Park due to the potential distance from some existing residents. However, this concern is not shared where there is reference to the possibility of encouraging connectivity between the existing and new communities and the opportunities for the existing community to benefit from services within the new development. For instance, the following quotes are of relevance:

'Community groups and societies are organised on a parish-wide basis and facilities are used by all residents regardless of which part of the area they live in' (paragraph 2.10).

With reference to a community centre/sports hall *'It is expected that the development at Adastral Park will provide such facilities therefore it is important that these are physically accessible to the existing population in the Neighbourhood Plan area. This could include, if appropriate, land at the Martlesham Heath Business Park'* (paragraph 6.11).

'The provision of walking and cycling linkages to new leisure uses proposed as part of the strategic development at Adastral Park will be strongly supported' (Policy MAR10).

With reference to MUGAs *'Such provision, if not in Martlesham Heath, could potentially be made as part of the Adastral Park development, subject to access being reasonably easy for the existing community'* (paragraph 6.14).

'The opportunity created by Adastral Park development to improve cycling and walking access to new community and leisure facilities, to Kesgrave High School and to the retail facilities at Martlesham Heath Retail Park' (paragraph 7.1).

The above are numerous references to the capacity and potential for the existing and future communities to share services within Adastral Park. It therefore seems reasonable to assume that this applies to all facilities, including healthcare. Whilst there may be potential to retain the existing healthcare facility at the Square, as well as a new surgery at Adastral Park, this is dependent on how NHS England and the Clinical Commission Group (CCG) intend to structure services. The important point is that there is scope to facilitate additional healthcare services at Adastral Park and the Neighbourhood Plan itself confirms sufficient potential for connectivity and the sharing of services. This further justifies the earlier point that the Neighbourhood Plan should not be used to restrict opportunities for alternative forms of development at the District Centre as sufficient mitigation options for healthcare provision are already scheduled.

Image on Page 23

The 'View from Eagle Way towards Martlesham Heath village centre' is not correct. The image contains a far greater number of trees than at this location. This image is actually taken from Lancaster Drive. Using this image is consequently misleading and it is suggested that this should be corrected prior to adoption.

Areas to be Protected from Development

MAR 2 and Paragraph 4.17

It is considered that draft policy MAR2 is reasonable and reflects the policy wording of saved policy AP28, which it will then supersede. However, the supporting text is not considered a true reflection of the justified basis for the designation, contrary to what is stated at paragraph 4.16. It is therefore suggested that paragraph 4.17 needs to be updated to better reflect the original basis of the policy established in saved policy AP28. Stating '*Whilst some types of development such as for residential or commercial use would run counter to the main policy objective...*' is not correct. Saved policy 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 detracting identified in the policy. Providing the additional assumption and reference to particular uses goes beyond the intention of the policy on which it is based. It is therefore suggested that reference to this in the supporting text at paragraph 4.17 should be removed. If further supporting text is to be added, this should be comparable to that which accompanies AP28. Otherwise, policy AP28 should not be used as the basis.

It is also considered that a review of the extent of Areas to be Protected from Development would be an opportunity to help facilitate the delivery of additional residential development, the need for which is referenced elsewhere within this letter. The area of land to the east of The Square at Martlesham Heath has potential to accommodate modest residential development or circa. 10 homes (see Appendix 1). Small scale allocations of this nature would provide opportunities for growth within the locality rather than relying solely on the delayed Adastral Park and the very limited number of areas where infill development could be implemented (options particularly limited at Martlesham Heath). It is noted that the pre-submission draft of the Neighbourhood Plan indicated this entire area as having potential for future development (see Appendix 2). This was considered a proactive approach that could also facilitate wider public benefits such as works to the former runway which is a non designated heritage asset. This could provide a landscaped feature that creates improved connectivity between the Square, the Village Green and the car parking. The provision of residential development would also facilitate the re-design of the car park to enable spaces closer and better connected to the Square. On this basis, it is suggested that the Neighbourhood Plan should revisit opportunities for specific allocations for residential development, which would help address housing need and also provide greater opportunity for the local community to input into the public benefits that can be incorporated into schemes. The suggested site at Appendix 1 would provide an overall net benefit to this community hub, which would greatly outweigh the negligible loss of a small section of open land.

Policy MAR12

Allotments fall within the definition of 'leisure and community facilities' (see the Infrastructure Delivery Plan) and so are identified on the CIL 123 list.

In terms of community growing spaces, the policy is considered too broad. It is suggested that a minimum threshold should be included in the policy, below which all parties agree that a community growing space is not feasible or viable and so avoiding the need for an applicant to justify for each and every application and also avoiding subjectivity or inconsistency in approach to the policy.

Policy MAR13

Policy MAR13 is considered to conflict with the NPPF as currently drafted. MAR13 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 of the Neighbourhood Plan. This extremely restrictive approach overlooks the need to take into account the non designated status of the assets. The NPPF is clear at paragraph 132 that the more important the asset, the greater the weight that should be applied to its significance. Furthermore, paragraph 133 of the NPPF states the circumstances '*where local planning authorities should refuse consent, which is a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset*' (own emphasis). The proposed policy MAR13 provides a comparably restrictive policy but

applied to non designated heritage assets. This is not proportionate to their status and it is clear that in considering non designated assets, it is possible that benefits and other considerations could justify their loss. This approach reflects paragraph 135 of the NPPF where it states '*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*'. It is consequently proposed that policy MAR13 should be updated to reflect this national policy guidance and incorporate reference to the need for a balanced judgement in considering loss of any such assets.

Concluding Comments

The Martlesham Neighbourhood Plan is considered to provide a beneficial and valued addition to the Development Plan providing greater detail on the localised requirements and vision. However, as set out in these representations, there are certain aspects where there is slight inconsistency and gaps in the Plan. Rectification of these points would lead to a clearer overall plan in accordance with the principles in the NPPF and aligning with the adopted policies within the existing Development Plan. There are 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.

We would be grateful if the above comments could be provided to the examiner of the Neighbourhood Plan in accordance with Regulation 17.

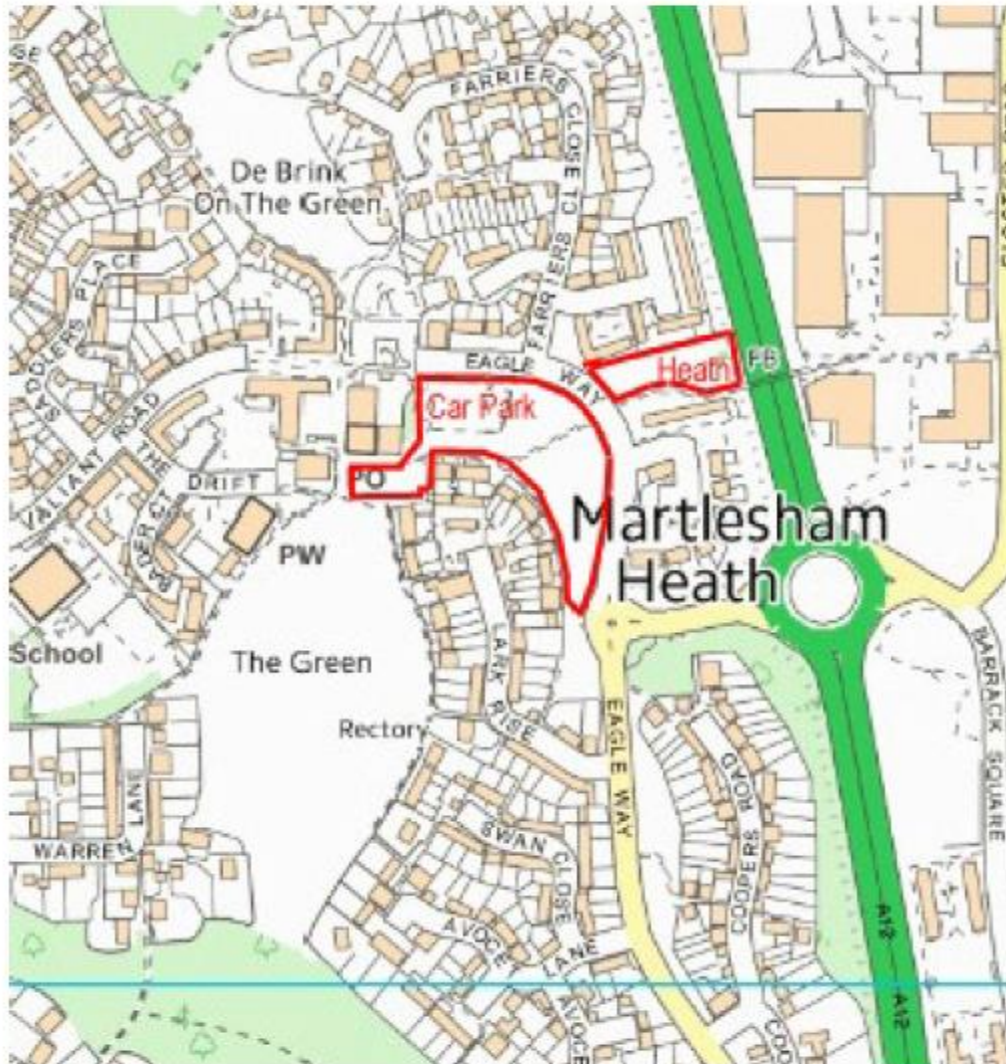
Yours sincerely

Claire Mills
Associate

Appendix 1: Land to the east of The Square

Appendix 2: Previous Figure 4.1 from the Pre-Submission Version of the Neighbourhood Plan

Figure 4.1: Potential area for development in Martlesham Heath (the area marked 'Car Park')



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