

MELTON NEIGHBOURHOOD PLAN

Submission Draft Version

**A report to Suffolk Coastal District Council
into the examination of the Melton
Neighbourhood Plan
by Independent Examiner, Rosemary Kidd**

Rosemary Kidd, Dip TP MRTPI
NPIERS Independent Examiner
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1.0 Summary

- 1.1 The Melton Neighbourhood Plan has been prepared to set out the community's wishes for the parish of Melton to address, as far as possible, the challenges that face the community.
- 1.2 I have made a number of recommendations in this report in order to make the wording of the policies and their application clearer and to ensure that they meet the Basic Conditions. Section 7 of the report sets out a schedule of the recommended modifications.
- 1.3 The main recommendations concern:
 - The deletion of Policy MEL17 and the inclusion of the developed areas within Policy MEL13 and the designation of Burkes Wood as a Local Green Space under Policy MEL12.
 - Designating Melton Road Playing Field as a Safeguarded Open Space under Policy MEL12.
 - Revisions to Policy MEL19 to better reflect the current uses on the employment area.
 - Revisions to Policy MEL21 to include reference to the strategic Recreation Avoidance Mitigation Strategy and to Protected Species and Priority Species and Habitats.
 - Revisions to Policy MEL2 to set out the traffic calming measures and crossing points as a Community Action.
 - Amendments to clarify the wording of policies to ensure that they are clear and unambiguous and to correct errors.
- 1.4 Subject to these modifications being made to the Neighbourhood Plan, I am able to confirm that I am satisfied that the Melton Neighbourhood Plan satisfies the Basic Conditions and that the Plan should proceed to referendum.

2.0 Introduction

- 2.1 Neighbourhood planning was introduced by the Localism Act 2011 which allows local communities to create the policies which will shape the places where they live and work. The Neighbourhood Plan provides the community with the opportunity to develop a vision to steer the planning of the future of the parish, to prepare the policies and allocate land for development which will be used in the determination of planning applications in the parish.
- 2.2 Neighbourhood development plans that are in general conformity with the strategic policies of the local development plan for the local area (and which together form the local development plan), and have appropriate regard to national policy, have statutory weight. Decision-makers are obliged to make decisions on planning applications for the area that are in line with the development plan which will include the neighbourhood development plan, unless material considerations indicate otherwise.
- 2.3 Neighbourhood Plans are developed by local people in the localities they understand and as a result each plan will have its own character. I have been appointed to examine whether the submitted Neighbourhood Plan meets the basic conditions and the other statutory requirements. It is not within my role to re-write a plan to conform to a standard approach or terminology. Indeed it is important that neighbourhood plans are a reflection of aspirations of the local community. They should be a local product and have particular meaning and significance to people living and working in the area.
- 2.4 The nature of neighbourhood plans varies according to local requirements. A neighbourhood plan can be narrow in scope. There is no requirement for a neighbourhood plan to be holistic, or to include particular types of policies, and there is no requirement for a neighbourhood plan to be formulated as, or perform the role of, a comprehensive local plan.

Legislative Background

- 2.5 I have been appointed by Suffolk Coastal District Council with the consent of Melton Parish Council, to undertake the examination of the Neighbourhood Plan and prepare this report of the independent examination. I am independent of the Parish Council, the Neighbourhood Plan Steering Group and Suffolk Coastal District Council. I do not have any interest in any land that may be affected by the Neighbourhood Plan and I hold appropriate qualifications and have appropriate experience. My appointment has been facilitated by the Neighbourhood Planning Independent Examiners Referral Service.
- 2.6 As an Independent Examiner, I am required to determine, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, whether:
 - (a) the policies of the Neighbourhood Plan relate to the development and use of land for a designated neighbourhood area;

- (b) the Neighbourhood Plan meets the requirements to: specify the period to which it has effect; not include provision about excluded development; and not relate to more than one neighbourhood area;
- (c) the Neighbourhood Plan has been prepared for an area that has been properly designated for such plan preparation; and
- (d) the Neighbourhood Plan has been prepared and submitted for examination by a qualifying body.
- 2.7 I am satisfied that the Neighbourhood Plan subject to the modifications proposed, includes policies that relate to the development and use of land and does not include provision for any excluded development. There are no other neighbourhood plans for the plan area. The Neighbourhood Plan area is co-terminus with the parish of Melton and was designated by Suffolk Coastal District Council on 24 December 2013 as a Neighbourhood Area. Paragraphs 1.5 – 1.10 of the Basic Conditions Statement confirm these points.
- 2.8 Paragraphs 1.3 of the Neighbourhood Plan and 1.7 of the Basic Conditions Statement state that the lifespan of the Neighbourhood Plan is to be from 2016 to 2030 and this is shown on the front to cover of the plan.
- 2.9 The neighbourhood plan making process has been led by Melton Parish Council which is a “qualifying body” under the Neighbourhood Planning legislation which entitles them to lead the plan making process. The Plan has been prepared by the Melton Neighbourhood Plan Steering Group on behalf of Melton Parish Council.
- 2.10 I am satisfied therefore that the Melton Neighbourhood Plan satisfies all the requirements set out in paragraph 2.6 above.

Conformity with Basic Conditions

- 2.11 An Independent Examiner must consider whether a neighbourhood plan meets the “Basic Conditions”. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:
1. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 2. the making of the neighbourhood plan contributes to the achievement of sustainable development;
 3. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 4. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and
 5. 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. The following prescribed condition relates to Neighbourhood Plans:

- o Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 (as amended) sets out a further basic condition in addition to those set out in the primary legislation. That the making of the neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007) (either alone or in combination with other plans or projects). (See Schedule 2 to the Neighbourhood Planning (General) Regulations 2012 (as amended).

- 2.12 The role of an Independent Examiner of a neighbourhood plan is defined. I am not examining the test of soundness provided for in respect of examination of Local Plans. It is not within my role to examine or produce an alternative plan, or a potentially more sustainable plan. I have been appointed to examine whether the submitted Neighbourhood Plan meets the basic conditions and Convention rights, and the other statutory requirements.
- 2.13 A neighbourhood plan can be narrow or broad in scope. There is no requirement for a neighbourhood plan to be holistic, or to include policies dealing with particular land uses or development types, and there is no requirement for a neighbourhood plan to be formulated as, or perform the role of, a comprehensive local plan. The nature of neighbourhood plans varies according to local requirements.
- 2.14 It is not within my role to re-interpret, restructure, or re-write a plan to conform to a standard approach or terminology. Indeed it is important that neighbourhood plans are a reflection of thinking and aspiration within the local community. They should be a local product and have particular meaning and significance to people living and working in the area.
- 2.15 I have only recommended modifications to the Neighbourhood Plan (presented in bold type) where I consider they need to be made so that the plan meets the basic conditions and the other requirements I have identified.

Policy Background

- 2.16 The first basic condition is for the neighbourhood plan “to have regard to national policies and advice contained in guidance issued by the Secretary of State”. The requirement to determine whether it is appropriate that the plan is made includes the words “having regard to”. This is not the same as compliance, nor is it the same as part of the test of soundness provided for in respect of examinations of Local Plans which requires plans to be “consistent with national policy”.
- 2.17 The Planning Practice Guidance assists in understanding “appropriate”. In answer to the question “What does having regard to national policy mean?”

the Guidance states a neighbourhood plan “must not constrain the delivery of important national policy objectives.”

- 2.18 The National Planning Policy Framework 2012 (NPPF) sets out the Government’s planning policies for England and how these are expected to be applied. The Planning Practice Guidance provides Government guidance on planning policy.
- 2.19 The third basic condition is for the neighbourhood plan as a whole to be in general conformity with the strategic policies contained in the Development Plan for the area. The Development Plan comprises the 2013 Suffolk Coastal Local Plan Core Strategy and Development Management Policies which were adopted on July 2013; the Site Allocations and Area Specific Policies Development Plan Document which was adopted by the Council on 26th January 2017. A number of saved policies from the Suffolk Coastal Local Plan (incorporating the First and Second Alterations) also remain as part of the Development Plan for Suffolk Coastal District. The Council has started work on a revised Local Plan although this is at a very early stage.
- 2.20 Representations have been made that the housing requirement in the Local Plan is out of date. This is a matter that will be considered during the forthcoming review and is not a matter for the Neighbourhood Plan. The Basic Condition requires that I consider whether the Neighbourhood Plan is in general conformity with the strategic policies of the development plan in force at the time of the examination. As the Local Plan review is at a very early stage no details are available yet about the revised housing supply policies.
- 2.21 I have considered the Neighbourhood Plan as a whole and each policy in turn to assess whether they are in general conformity with the strategic policies of the adopted Development Plan.
- 2.22 I have also considered whether the Neighbourhood Plan would introduce policies and designations that may constitute blanket restrictions that may restrict future development in the area contrary to the Local Plan strategy. I have considered whether there is robust evidence to support any proposed designations that would introduce such restrictions.
- 2.23 The Basic Conditions Statement sets out an assessment of how the Neighbourhood Plan policies have had regard to national policy and how it is in general conformity with the strategic policies of the 2013 Suffolk Coastal Local Plan Core Strategy and Development Management Policies. Where appropriate I have also considered the strategic policies contained in the Site Allocations and Area Specific Policies Development Plan Document and the saved policies of the Local Plan.
- 2.24 I have considered the Neighbourhood Plan as a whole against the NPPF and PPG and the adopted strategic policies. Then I have considered each of the policies to ascertain whether there is any conflict between a particular policy and the NPPF or the strategic policies of the Development Plan. Where appropriate I have highlighted relevant policies and guidance when

considering each policy of the Neighbourhood Plan. I have also considered the Basic Conditions Statement submitted alongside the Neighbourhood Plan.

EU obligations and human rights requirements

- 2.25 A neighbourhood plan must be compatible with European Union obligations as incorporated into UK law, in order to be legally compliant. Key directives relate to the Strategic Environmental Assessment Directive, the Environmental Impact Assessment Directive and the Habitats and Wild Birds Directives. A neighbourhood plan should also take account of the requirements to consider human rights.

- 2.26 A Sustainability Appraisal incorporating a Strategic Environmental Assessment (SEA) and a Habitats Regulations Assessment (HRA) was undertaken on the draft Neighbourhood Plan prior to submission. The SEA report concluded that:

"For some of the policies that have a negative impact on the environment, there are other aspects that contribute positively to social or economic objectives. Other policies in the Neighbourhood Plan and District Plan should mitigate these negative environmental impacts.

"Overall the most sustainable policy options have been chosen for inclusion in the Neighbourhood Plan. None have any significant adverse effects, giving confidence that the policies in the Plan will contribute to sustainable development."

- 2.27 Suffolk Coastal District Council consulted with the statutory bodies Historic England, Natural England and Environment Agency on the Scoping Report for the SEA and HRA in October and November 2016.

- 2.28 Representations from Natural England on the SEA Scoping process identified that there was the potential for significant effects of the Plan under the Habitats Regulations Assessment (HRA). This related to housing development in Melton and the potential adverse effects that the increased population could have on European designated sites including Sandlings Special Protection Area (SPA), Minsmere-Walberswick SPA/Ramsar site and Minsmere to Walberswick Heaths & Marshes Special Area of Conservation (SAC).

- 2.29 A screening opinion was sought from Suffolk Coastal District Council and in June 2016, this ascertained that an HRA was required.

- 2.30 A Habitats Regulations Assessment (HRA) was carried out and resulted in amendments to a number of policies to ensure that adequate mitigation measures were put in place. As a result of these changes, it was considered that the Melton Neighbourhood Plan was unlikely to have a significant effect upon the integrity of any European site.

- 2.31 The HRA concluded in paragraphs 4.1 – 4.7 that:

"The Melton Neighbourhood Plan Submission Version as a standalone document is likely to have a significant effect upon the Deben Estuary European site, particularly with those policies promoting housing and community development and potentially by encouraging improvements to cycle and pedestrian routes that may lead towards European sites. A slight cumulative increase in recreational pressure upon the Deben Estuary might result. However, the Melton Neighbourhood Plan is set within the context of other plans, particularly the SCDC Local Plan with which the Neighbourhood Plan must be consistent. It is therefore relevant to consider the likely significant effect of the Neighbourhood Plan in combination with the SCDC Local Plan, because the mitigation associated with the SCDC Plan encompasses the Neighbourhood Plan too.

"The Melton Neighbourhood Plan is intended as one part of the development plan for Melton Parish.The strategy and policies of Melton Neighbourhood Plan are entirely consistent with the adopted SCDC Core Strategy, which has its own Appropriate Assessment that addresses the potential impacts on European sites that might occur from increased visitor pressure, due to an increase in human population resulting from the development of new homes that are planned for the District.

"SCDC's Core Strategy Appropriate Assessment provides in-depth methodology for mitigating the effects that increased visitors may have on European sites. The mitigation measures would be implemented through Policy SP17 – Green Space in the SCDC Core Strategy

"The policies of Melton Neighbourhood Plan are intended to be used in conjunction with the policies of the SCDC Core Strategy and Development Management Policies Development Plan Document, to guide the development and growth of Melton Parish. As such the policies of Melton Neighbourhood Plan are consistent with those of SCDC Core Strategy and its Appropriate Assessment.

"Overall, when in combination with [other plans and strategies], the Melton Neighbourhood Plan is unlikely to have a significant effect upon the integrity of any European site.

- 2.32 The Basic Conditions Statement comments that "*The Neighbourhood Development Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act.*" However no assessment has been included in the report.
- 2.33 Article 1 of the First Protocol protects the right of everyone to the peaceful enjoyment of possessions. Although the Submission Plan includes policies that would restrict development rights to some extent, this does not have a greater impact than the general restrictions on development rights provided for in national law, namely the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011.

- 2.34 Article 6 protects the right to a fair and public hearing before an independent tribunal in determination of an individual's rights and obligations. The process for Neighbourhood Plan production is fully compatible with this Article, allowing for extensive consultation on its proposals at various stages, and an independent examination process to consider representations received.
- 2.35 Article 14 provides that "*The enjoyment of the rights and freedoms set forth in ... [the] ... European Convention on Human Rights shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.*" In the Consultation Statement, the Qualifying Body has provided evidence on how the statutory and non-statutory consultations have been carried out and demonstrated that they were undertaken in such a way that all sections of the local community have been given the opportunity to express their views.
- 2.36 As far as I can ascertain, the policies of the plan and its preparation have taken account of the need to consider human rights. I consider that the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations and human rights requirements and therefore satisfies that Basic Condition.

Contributes to sustainable development

- 2.37 The Basic Conditions Statement has included an assessment of the contribution of the objectives and policies towards the three key principles to sustainable development: economic, social and environmental and commented on how each policy will contribute towards delivering sustainable development. A full Sustainability Appraisal has also been undertaken.
- 2.38 I am satisfied that the Melton Neighbourhood Plan will support the delivery of sustainable development and help to meet the social and economic development needs of the parish within the environmental context of the area.

The Neighbourhood Plan Preparation

- 2.39 I am required under The Localism Act 2011 to check the consultation process that has led to the production of the Plan. The requirements are set out in Regulation 14 in The Neighbourhood Planning (General) Regulations 2012.
- 2.40 The Consultation Statement sets out an overview of the consultation process that has been undertaken in the course of preparing the Neighbourhood Plan. The preparation of the Neighbourhood Plan commenced in January 2014 following the designation of the Plan area. A Community Engagement Strategy was prepared to guide the consultation.
- January 2014 – questionnaires to every household and business in the parish
 - July 2014 – two open days and follow up letters to households and businesses

- March 2016 - three Neighbourhood Plan Open Sessions at Melton Primary School so that the community could look at the draft Neighbourhood Plan and proposed policies as well as look at a potential development proposal for 50 affordable houses and community facilities. The Vision, Mission, Objectives and main Policies and their backgrounds were publicised.
 - The consultations and events were publicised through the Parish Council and Neighbourhood Plan websites, the village newsletters, by email and through posters.
 - During the course of preparing the Neighbourhood Plan, consultations were carried out with District and County Council Officers, Local landowners, local businesses and retailers, the Primary School and Parish Councils within a 5 mile radius.
 - The Group reviewed the feedback to ascertain whether there were any particular sections of the community that were being under-represented. However, it was felt that this was not the case and that a reasonable cross-section of the community had given their views. A presence at the Melton Village Fete in 2013 and 2014, the Young Persons Questionnaire sent in June 2013 and engagement with the Primary School was also good way to engage with typically hard-to-reach groups such as young working families.
 - The Regulation 14 Pre-Submission Consultation ran from 1st July 2016 to 23rd September 2016. In accordance with requirements of the Neighbourhood Planning Regulations, relevant statutory consultees and other interested parties were notified of the consultation by letter.
 - A representation has been made that the wording on the neighbourhood plan website for the Regulation 14 consultation was biased towards minimising growth. Another representation said the material on the parish council's website was misleading as it referred to the development site at Wilford Bridge Road as brownfield when part of it is greenfield.
- 2.41 I have considered the representations and note the concerns raised. However, I am satisfied that the pre-submission consultation and publicity has met the requirements of Regulations 14 and 15 in the Neighbourhood Planning (General) Regulations 2012.

The Examination Process

- 2.42 The presumption is that the Neighbourhood Plan will proceed by way of an examination of written evidence only. However the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or so that a person has a fair chance to put a case.
- 2.43 I have undertaken this examination by way of written representations. I have considered the representations received during the consultation on the Submission draft plan. I have presented a number of questions to the Qualifying Body and Local Planning Authority seeking further clarification and information in writing. I have undertaken an unaccompanied visit to the Plan area.

- 2.44 I have considered the Basic Conditions Statement and the Consultation Statement as well as the reports for the Strategic Environmental Assessment and Habitats Regulations Assessment and other background evidence. In my assessment of the plan as a whole and each policy I have commented on how the plan and policy has had regard to national policies and advice and whether it is in general conformity with relevant strategic policies.
- 2.45 This report is the outcome of my examination of the Submission Draft Version of the Melton Neighbourhood Plan 2016 - 2030. I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions. My report makes recommendations based on my findings on whether the Plan meets the Basic Conditions and provided the Plan is modified as recommended, I am satisfied that it is appropriate for the Neighbourhood Plan to be made. Once the plan is approved by Suffolk Coastal District Council it may proceed to a referendum. If it receives the support of over 50% of those voting then the Plan will be made by Suffolk Coastal District Council.
- 2.46 Under the terms of the neighbourhood planning legislation I am required to make one of three possible recommendations:
- that the plan should proceed to referendum on the basis that it meets all the legal requirements;
 - that the plan should proceed to referendum if modified; or
 - that the plan should not proceed to referendum on the basis that it does not meet all the legal requirements.
- 2.47 If recommending that the Neighbourhood Plan is submitted to referendum my report must also recommend whether the area for the referendum should extend beyond the neighbourhood area to which the Neighbourhood Plan relates, and if to be extended, the nature of that extension. It is a requirement that my report must give reasons for each of its recommendations and contain a summary of its main findings.

3.0 Neighbourhood Plan – As a whole

- 3.1 In considering the policies contained in the Plan, I have been mindful of the guidance in the Planning Practice Guide (PPG) that:

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like.”

- 3.2 In order to ensure that a neighbourhood plan can be an effective tool for the decision maker, the PPG advises that

“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”

- 3.3 NPPF paragraph 183 states that parishes can use neighbourhood planning to set planning policies through neighbourhood plans to determine decisions on planning applications. The Planning Practice Guidance on Neighbourhood Plans states that neighbourhood plans should “*support the strategic development needs set out in the Local Plan*” and further states that “*the neighbourhood plan must address the development and use of land by setting planning policies to be used in determining planning applications because once the plan is made it will become part of the statutory development plan*”.

- 3.4 National planning advice in NPPF paragraphs 16 and 184 is that neighbourhood plans should support the strategic development needs set out in the Local Plan, plan positively to support local development and should not promote less development than set out in the Local Plan or undermine its strategic policies. Nor should it be used to constrain the delivery of a strategic site allocated for development in the Local Plan.

- 3.5 NPPF paragraph 55 states that “*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities*”. The PPG adds the following guidance on rural housing “*all settlements can play a role in delivering sustainable development in rural areas – and so 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*”.

- 3.6 The Basic Conditions require that the Examiner considers whether the plan as a whole has had regard to national policies and advice contained in guidance issued by the Secretary of State and whether it is in general conformity with the strategic local policies. I now turn to considering whether

the policies in the plan taken together have had regard to national and local strategic planning policies.

- 3.7 Melton has a population of 3741 in 2011 with nearly 1800 households. The Neighbourhood Plan area is located to the north- east of Woodbridge and contains part of the built up area of the town. Much of the parish is rural with an area of AONB, a conservation area, special landscape areas and woodland. The nearby Deben Estuary is a Natura 2000 site of European importance.
- 3.8 The Melton Neighbourhood Plan as a whole is thorough, clear and well presented. The Plan has sought to provide for the development needs of the community with provision for a housing site of 55 dwellings as part of a mixed use redevelopment with employment and open land uses. However, whilst the employment uses would make use of vacant employment land, the housing site would involve the use of an adjacent greenfield site. Concerns have been expressed about the suitability of the site in respect of the impact on flood risk, access and loss of trees and habitat.
- 3.9 The Plan contains a number of proposals for new and improved community facilities and infrastructure. Priorities for infrastructure provision have not been set out and it is unclear whether some schemes are deliverable or should be taken forward as community aspirations. The safeguarding of some existing open spaces is proposed. However, there is a degree of tension between proposals for a new village hall and increased car parking on the playing field site and the aspiration to designate it as a Local Green Space.
- 3.10 A number of policies in the Plan have been derived from the saved policies from the old Suffolk Coastal Local Plan. I have concerns that some of these policies have been overtaken by more recent development, are out of date or not clearly worded. Some are restrictive and not supported by evidence to justify them.
- 3.11 Certain policies state that planning permission will be granted for a particular type of development. The Neighbourhood Plan policies cannot indicate whether planning permission should be granted for a particular form of development. NPPF paragraph 2 states that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan consists of the Local Plan as well as the Neighbourhood Plan and there may be other matters that have to be considered before granting planning permission. Modifications are proposed to these policies to avoid this form of wording to take account of national policy.

Introductory Sections to the Neighbourhood Plan

- 3.12 The Introduction to the Neighbourhood Plan sets out the national and local strategic context clearly. Paragraph 1.1 should be updated to refer to the adopted Site Allocations and Area Specific Policies Development Plan Document and the commencement of the review of the Local Plan.

- 3.13 Chapter 2 sets out the historical context for Melton, a summary of key statistical data and describes the issues facing the parish today.

The Neighbourhood Plan's Vision and Objectives for Melton

- 3.14 The vision of the plan sets out the aim to retain the parish as a unique place safeguarding its historical and community assets within a sensitive well managed natural landscape. The vision statements also address infrastructure and traffic, commercial and retail development and community facilities.
- 3.15 Six objectives have been developed from the vision, however no assessment has been undertaken to show how they have been delivered through the policies of the Neighbourhood Plan.
- 3.16 It is considered that the vision and objectives are clear and distinct and are addressed through policies in the Plan.

4.0 Neighbourhood Plan – The Policies

Strategic Context for Residential Development in Melton

- 4.1 Suffolk Coastal Local Plan sets out the settlement hierarchy in Policy SP19. This policy identifies the proportion of housing development that is to be developed in each type of centre and the scale of such development. For strategic planning purposes, the parish may be split as follows:
- a) Greater Woodbridge - That part which lies within the physical limits boundary of Woodbridge to which Local Plan Policy SP26 applies. The strategy for Woodbridge is to balance opportunities with the acknowledged physical and environmental constraints, in order to maintain and enhance its roles as the principal market town within the district, an employment centre and a tourist destination. The strategic policy identifies a housing allocation of 200 for the Greater Woodbridge area, of which Melton parish forms a part. The grant of planning permission at Woods Lane contributes up to 180 homes towards this allocation. Housing development on other windfall sites at the former Council Offices on Melton Hill/ Pytches Road junction and Cedar House opposite the former Council Offices are also to be attributed to Woodbridge.
 - b) Melton Village -The main village area, which is identified as a “Key Service Centre” to which Local Plan Policy SP27 applies. The strategy for Key Service Centres is to support and reinforce their individual character and to permit housing development within defined physical limits or where there is a proven local support in the form of small allocations of an appropriate scale.
 - c) Melton Park – the former St Audry’s Hospital site which is identified as an “Other Village”, to which Local Plan Policy SP28 applies. New housing development in the village is to be strictly controlled.
 - d) The remainder of the neighbourhood plan area is designated as countryside under Local Plan Policy SP29. New development is to be limited to exceptional forms of development.
- 4.2 Policy SSP1 states that “*Where a current planning permission, or a resolution to grant planning permission subject to a legal agreement, fall within a designated neighbourhood plan area, they will be treated as part of the minimum level of housing that the neighbourhood plan should provide for*”.
- 4.3 Policy SSP2 identifies the purpose of physical limits boundaries around the larger settlements where development is to occur.

Policy MEL1: Physical Limits Boundaries

- 4.4 A review of the Physical Limits Boundaries around that part of Greater Woodbridge in the Plan area and Melton Village has been undertaken as part

of the preparation of the Neighbourhood Plan in accordance with Policies SP26, SP27 and SSP2 of the Local Plan. The Neighbourhood Plan proposes to allocate one site on land off Wilford Bridge Road under MEL 21. I have considered the allocation in more detail under the Policy itself.

- 4.5 I have given consideration to whether the Physical Limits Boundary has been defined in accordance with the strategic policy and whether sufficient sites have been included to deliver the strategic housing requirement.
- 4.6 The Local Authority has provided me with the following figures on the housing requirement, housing commitments and completions: Figures for 2010 to 2015 are taken from Table 2 of the Site Allocations DPD.

Table 1 Housing requirement, housing commitments and completions

	Completions & commitments at 2010 -2015	Additional housing required to be allocated	Net new dwellings permitted on sites of 5 or more dwellings between 1/4/2015 – 31/03/2017
Woodbridge	101	200	195
Melton Village	97	10	18

- 4.7 The local planning authority has identified the following housing sites as contributing to the adopted Local Plan housing requirement:

Table 2 Housing sites potential

Woodbridge	
Woods Lane	Up to 180 (outline)
Former Council offices	Approx 100
Cedar House	12
Melton Village	
Commitments	18
Proposed allocation	55

- 4.8 The Local Planning Authority is satisfied that the housing requirement for Greater Woodbridge can be more than met by the sites identified. In Melton Village, the current commitments and completions will exceed the housing requirement. Proposals under Policy MEL21 would be in excess of the requirement. The named sites in Table 2 above are all included in the Physical Limits Boundaries for Woodbridge or Melton. I have no reason to doubt their conclusions.
- 4.9 However, as the adopted Local Plan runs to 2027, it is not possible to ascertain whether the Neighbourhood Plan will provide sufficient housing to

cover the period 2027 – 2030 in view of the uncertainties about the future housing requirement for this period which will be addressed in the Local Plan review. In response to my question on the matter, the Local Planning Authority has informed me of the figures from the Strategic Housing Market Assessment published in May 2017 which identifies an objectively assessed need figure slightly lower than the annual figure in the current Core Strategy.

- 4.10 The Local Planning Authority has provided me with an estimate that the housing provision for the additional three years based on this data would be in the order of 19 dwellings. The mixed use proposal at Wilford Bridge Road would deliver 55 dwellings which would more than meet this additional requirement.
- 4.11 Representations have been made that the identification of a Physical Limits Boundary should not be used as a means of restricting growth as this does not accord with the positive approach to growth required by the NPPF. Boundaries should be drawn to include land allocations to facilitate the required level of growth.
- 4.12 A representation has been made proposing that a Physical Limits Boundary be defined around Melton Park.
- 4.13 A representation has been made that the Basic Conditions Statement or other background evidence should include evidence on the housing requirement and supply. It states that the Neighbourhood Plan relies on out of date figures and ignores the District's true objectively assessed need.
- 4.14 A representation has been made that in order to avoid the Neighbourhood Plan becoming out of date should a housing land supply shortfall emerge across the District, the Neighbourhood Plan should consider including potential reserve site.
- 4.15 A representation states that the Neighbourhood Plan relies on an out of date Local Plan and fails to deliver proportionate and necessary growth.
- 4.16 Local Plan policies apply Physical Limits Boundaries to all settlements identified as sustainable in the Core Strategy under Policy SP19 Settlement Hierarchy and this includes the market town of Woodbridge and the Key Settlement of Melton Village. Melton Park is classed as an "Other Settlement" where only very limited development will be permitted in the circumstances stated in Policy SP28 and where the Local Plan requires that Physical Limits Boundaries should not be defined.
- 4.17 It is considered that the identification of Physical Limits Boundaries around only Woodbridge and Melton accords with the strategic policy approach. I am satisfied that the boundaries have been defined to include sufficient land to deliver more housing than that required in the adopted development plan with an allowance for the additional three years of the Neighbourhood Plan period.

- 4.18 Planning Practice Guidance states that “*A draft neighbourhood plan must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development.*”
- 4.19 In order to minimise potential conflicts with the emerging Local Plan and to ensure that policies in the neighbourhood plan are not overridden by a new Local Plan, the PPG advises that neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed.
- 4.20 It is considered that the proposed housing allocation would support the delivery of additional housing over and above the housing requirement of the adopted Local Plan.
- 4.21 The third paragraph of Policy MEL1 and the fifth bullet point states that development proposals outside the physical limits boundary will not be permitted unless “they relate to the site allocated in Policy MEL21”. In response to my question on the matter, the Qualifying Body has responded to say that there is an error with the mapping. However, following my consideration of the proposals under Policy MEL21 I consider it appropriate to include the site allocation within the physical limits boundary. The bullet point is incorrect and should therefore be deleted.
- 4.22 Subject to the recommended modification, it is considered that Policy MEL1 meets the Basic Conditions and has taken account of national planning policy and is in general conformity with strategic local policy.

Recommendation 1: Revise Policy MEL1 as follows

Delete the fifth bullet point;

Correct the spelling of Coastal in the sixth bullet point.

Transport and Movement

Policy MEL2: Dedicated Access for Cyclists and Pedestrians

- 4.23 The policy encourages improved access for cyclists and pedestrians, including disabled users and particularly mobility scooters. The second part of the policy includes a list of seven projects for dedicated footpath/cycleway routes, crossing points and traffic calming measures.
- 4.24 The PPG states that communities can use neighbourhood plans to set policies to be used in determining planning applications and that

neighbourhood plans may wish to consider what infrastructure needs to be provided to support the development proposed in the plan to ensure that the neighbourhood can grow in a sustainable way. When new and improved infrastructure is identified, the neighbourhood plan should set out the prioritised infrastructure required.

- 4.25 A representation has been received proposing consideration of a cyclepath along Melton Road to Woodbridge. The examiner's role is limited to considering whether the Neighbourhood Plan policies satisfy the Basic Conditions; it does not extend to considering whether other sites or proposals should be included in the Plan.
- 4.26 In response to my question on which proposals are priorities to deliver the development proposals and which are aspirational to improve traffic conditions in the plan area generally, the Qualifying Body has responded to state that the proposals for new transport provision including improved foot and cycle provision and car parking are interlinked and, in some instances, extend beyond the boundary of the neighbourhood plan area.
- 4.27 The policy has been discussed with Suffolk County Council and they have stated that the policy is generally appropriate.
- 4.28 The list of projects includes pedestrian/cycle crossing points and traffic calming measures which would be undertaken by the Highway Authority as permitted development. As these are not proposals that would not be subject to planning permission, it is considered that it is not appropriate to include them in the development plan policy as this would not have regard to the advice in PPG on the purpose of Neighbourhood Plans. It is recommended that they be included in the Neighbourhood Plan as a Community Action.
- 4.29 Subject to this modification, it is considered that the policy meets the Basic Conditions.

Recommendation 2: Revise Policy MEL2 as follows:

Delete bullet points 2, 4, 5, 6, and 7 relating to the crossing points and traffic calming measures.

Include a new Community Action under the section on Non Land Use Issues stating “*The Parish Council will strongly support the following: include bullet points 2, 4, 5, 6, and 7.*

Policy MEL3: Views from Footpaths, Cyclepaths and Public Rights of Way

- 4.30 The policy expects development proposals to be designed so that they do not have a significant impact on short distance views of the Area of Outstanding Natural Beauty and the Rive Deben from any of the types of routes specified.

- 4.31 A representation has been made that the policy reads as an aspiration and lacks criteria about the circumstances of how the policy is to be applied.
- 4.32 It is considered that this policy appears to be very wide ranging as it applies to any footpath, cycleway or public right of way in the parish. In response to my question about which routes the policy will apply to, the Qualifying Body has supplied a map showing eight routes.
- 4.33 Subject to the policy referring to a significant “adverse” impact and the routes being shown on the Proposals Map, it is considered that the policy meets the Basic Conditions.

Recommendation 3: Revise Policy MEL3 to read:

“.....a significant *adverse impact* on....from the routes shown on the Proposals Map.”

Include the routes shown on the map in Appendix A of the responses to the Examiner’s Questions on the Proposals Map.

Policy MEL4: Bus and Community Transport Provision

Policy MEL5: Melton Railway Station

- 4.34 These policies support proposals to provide public transport infrastructure along existing bus routes and secure bicycle racks at Melton Railway Station.
- 4.35 The justification states that the Parish Council will seek to secure these improvements through the use of its Community Infrastructure Fund receipts.
- 4.36 It is considered that the policies meet the Basic Conditions.

Policy MEL6: Parking Standards

- 4.37 The policy sets out minimum parking standards for new residential development and seeks to ensure that there is no reduction in parking provision as a result of developments affecting existing housing
 - 4.38 The National Planning Policy Framework (NPPF) contains specific guidance in respect of parking in paragraph 39: “*If setting local parking standards for residential and non-residential development, local planning authorities should take into account:*
- *the accessibility of the development;*
 - *the type, mix and use of development;*
 - *the availability of and opportunities for public transport;*
 - *local car ownership levels; and*
 - *an overall need to reduce the use of high emission vehicles*”.

- 4.39 On 25 March 2015, the Secretary of State for Communities and Local Government announced that national planning policy would be amended to further support the provision of car parking spaces.
- 4.40 Development Management Policy DM19 – Parking Standards requires new development to provide parking provision in accordance with the Council's adopted parking standards which are currently set out in the Suffolk Advisory Parking Guidance – Technical Guidance which was updated in 2015 following the change in national advice.
- 4.41 The first part of the policy sets out only small changes to the County Guidance by amending the standard for 2-bed houses and flats and by introducing a standard for 5+ houses and flats.
- 4.42 The second part of the policy states that development that results in the loss of off- or on- street parking will generally be refused unless the same number of spaces are re-provided nearby.
- 4.43 It is considered that this part of the policy is unclear and ambiguous. It does not take into account the adequacy or otherwise of the existing parking in relation to the standards as set in the parking guidance.
- 4.44 A representation has been made that the parking standards appear to be an overprovision of car parking spaces and would be contrary to the principles of sustainable development.
- 4.45 To ensure that the policy is clear and unambiguous, it is recommended that the second paragraph should be revised to refer to new development that results in the loss of off-road parking only being acceptable where adequate parking provision is made in accordance with the adopted parking standards.
- 4.46 Subject to the modification, it is considered that the policy meets the Basic Conditions.

Recommendation 4: that the second paragraph of Policy MEL6 be revised as follows:

"New development that results in the loss of off- or on-road parking spaces *should include adequate parking spaces in accordance with the adopted parking standards.*"

Revise Paragraph 5.28 to read: "Development proposals that would involve the loss of existing parking provision should ensure that sufficient spaces are made available to serve the development and to make alternative provision nearby for any parking spaces lost."

Policy MEL7: Land opposite McColls Convenience Store, The Street

- 4.47 Policy MEL7 proposes that parking spaces, seating and landscaping should be provided on land opposite McColls Convenience Store to provide additional parking area for the local shops.
- 4.48 In response to my question about the feasibility of the proposal, the Qualifying Body has commented that the land is owned by the District Council. The Parish Council intends to work with the District Council to resolve the current problems with cars parking on the green area by providing improved parking spaces and associated landscaping.
- 4.49 A representation has been made objecting to the parking on the grassed area.
- 4.50 It is considered that the Policy meets the Basic Conditions. However the Proposals Inset Map is at such a scale that boundaries of the site cannot readily be distinguished.
- 4.51 Subject to the modification, it is considered that the policy meets the Basic Conditions.

Recommendation 5: that a more detailed Inset Map be included that shows the boundaries of the site referred to in Policy MEL7.

Community Infrastructure

Policy MEL8: Community Facilities

- 4.52 The policy seeks to safeguard existing community facilities and retail facilities and includes the re-provision of a community facility and marketing of a retail outlet.
- 4.53 The third part of the policy sets out criteria for considering new community facilities.
- 4.54 Local Plan Policy DM30 sets out the circumstances where the redevelopment or change of use of key facilities (shops and pubs) may be acceptable; Policy DM31 makes provision for the change of use of public buildings such as schools, churches and halls to other uses; Policy DM32 sets out the factors to be considered in the provision of new sports and play facilities and the loss of such facilities.
- 4.55 A representation has been made that the policy does not provide support for nursing home or care facilities or that residential housing schemes should include housing for older residents. The site at Yarmouth Road includes a nursing home and assisted living accommodation and should be allocated in the Neighbourhood Plan.

- 4.56 The points are noted, however, there is no requirement for neighbourhood plan policies to be holistic or to address these matters.
- 4.57 It is considered that the Policy sets out additional matters to be considered in such proposals and meets the Basic Conditions. No modifications are proposed other than to correct a typographical correction in point 2 of the policy (...apply to...).

Policy MEL9: Provision of Community Facilities at the Playing Fields, Melton Road

- 4.58 The Policy supports the development of a new village hall to replace the existing pavilion at the Playing Fields, Melton Road, the extension of the car park, together with outdoor gym equipment.
- 4.59 The proposal would provide a modern village hall to replace the existing pavilion incorporating meetings rooms as well as changing facilities. In response to my question, the Qualifying Body has confirmed that the proposals are feasible and can be developed without the loss of sports pitches or protected trees. In addition, the drainage of the lower field is to be improved bringing back a large recreational area into recreational use.
- 4.60 The introduction to the policy states in paragraph 6.5 that the playing fields area is a key hub providing open space and a village hall. It is noted that the village hall is a proposal of the plan and the statement is considered to be misleading. It is recommended that reference to the village hall should be deleted from this paragraph.
- 4.61 Five representations have been made concerning the scale of the proposed village hall and the potential loss of recreational land and trees. Concern has also been expressed that there is insufficient evidence to support the proposals for the village hall.
- 4.62 Local Plan Policy DM32 sets out the factors to be considered in the provision of new facilities for sport and play and the safeguarding sports and play space.
- 4.63 It is considered that Policy MEL9 sets out a clear proposal for a new community facility and meets the Basic Conditions.

Recommendation 6: revise the second sentence of paragraph 6.5 to read:
“....informal recreation and children’s play.”

Policy MEL10: Provision of Allotments, Community Orchard and Community Farm/Educational Facility

- 4.64 The policy supports the provision of additional allotments, a community orchard and a new location of Pitstop after school and holiday club and its

expansion to include a community farm preferably within the Wilford Bridge Road site (Policy MEL21). The policy seeks to control linked trips to the Deben estuary by limiting car parking provision and ensuring that no direct footpath provision is made.

- 4.65 The policy brings together a number of community aspirations for new outdoor community space. The policy aspirations are also included in Policy MEL21.
- 4.66 In response to my question on the feasibility of this proposal and whether it would be deliverable in an area at risk of flooding, the Qualifying Body has provided an indicative site plan from the prospective developers showing a possible layout for the site proposed under Policy MEL21 and how the allotments and community farm could be included in the development. The Deben Community Farm CIC has confirmed that they have expressed an interest in relocating to the Wilford Bridge site.
- 4.67 Local Plan Policy DM33 supports the provision of new allotments. The limitations on linked trip to the Deben Estuary reflect the recommendations of the HRA to reduce visitor number to the European Habitats site.
- 4.68 A representation notes that allotments and a community orchard are proposed in the Yarmouth Road site.
- 4.69 It is considered that Policy MEL10 sets out a deliverable proposal for a new community outdoor space and a community children's facility and meets the Basic Conditions. No modifications are proposed.

Environment

Policy MEL11: Special Landscape Areas

- 4.70 This policy repeats Local Plan Policy SSP38 with the added proviso that it relates to the development proposals on land at Wilford Bridge Road under Policy MEL21. The boundary of the area is the same as that shown in the saved policy of the Suffolk Coastal Local Plan.
- 4.71 The Special Landscape Areas (SLA) were defined under saved Policy 13. The justification to Core Strategy Policy SP15 under paragraph 3.154 identifies the importance of the Special Landscape Area. The Site Allocations DPD has included the policy and retained the boundaries of the SLA. Paragraph 7.21 of the justification states that the review of the areas will require a county-wide approach as part of the emerging Local Plan review.
- 4.72 National planning policy has moved away from defining Special Landscape Areas towards defining landscape character areas. The Local Plan review will consider whether to change to a landscape character approach and if so a landscape character assessment is to be undertaken at a district level. Until

this time the Special Landscape Area remains a strategic policy approach and the policy is in general conformity with it.

- 4.73 A representation has been received that states that there is no evidence base to support the identification of the landscape protection in the Plan. A representation expresses concern about the conflict in the allocation of the site under Policy MEL21 and the designation as Special Landscape Area.
- 4.74 It is recognised that there is a degree of conflict between the designation of the Wilford Bridge Site as a Special Landscape Area and its allocation under MEL21 for development. However, Policy MEL11 makes provision for development within the Special Landscape Area provided that landscape improvements are made.
- 4.75 It is considered that the policy meets the Basic Conditions.

Policy MEL12: Protection and Maintenance of Local Green Space

- 4.76 This policy proposes to designate four areas as Local Green Space in accordance with NPPF paragraphs 76 – 77. Descriptions of the sites within the introduction to the policy explain why the sites are special to the local community. I have visited each site and concur with the assessments and agree that they meet the criteria set out in NPPF paragraph 77.
- 4.77 A representation has been received suggesting that Burkes Wood / Leek's Hill Woods which is shown under Policy MEL17 and covered by a TPO should be protected as a Local Green Space.
- 4.78 A representation has been made proposing that the bowling green at Melton Park should be safeguarded.
- 4.79 Burkes Wood is proposed to be protected from development under Policy MEL17 which I have recommended should be deleted. The Qualifying Body has provided a Map in Appendix A of the response to my questions which shows the boundary of the woodland. The land is owned by the Parish Council who prepared a Management Plan for the woodland in 2016. They have also provided an assessment of the area against the criteria set out in NPPF paragraph 77. The woodland is close to the residential area and is publicly accessible with a network of well used footpaths. It is clearly a tranquil area local to and well used by the community. In view of my recommendation to delete Policy MEL17, I consider it would meet the criteria of NPPF paragraph 77 and it would be appropriate to designate it as a Local Green Space. Only the area of woodland as shown on the map in Appendix A of the response to my questions should be designated as a Local Green Space and not the adjacent residential area or footpath links shown on the Proposals Map under MEL17.

- 4.80 The Neighbourhood Plan has not included proposals to safeguard the playing fields or bowling green at Melton Park. My remit is limited to considering whether the submitted plan meets the Basic Conditions. It is not within my remit to consider whether other potential sites should be safeguarded.
- 4.81 Paragraph 78 of the NPPF states that the policy for managing development within a Local Green Space should be consistent with policy for Green Belts. Paragraph 87 of the NPPF states that development in Green Belts should be approved in very special circumstances. Paragraph 89 sets out exceptional forms of development that may be acceptable. This includes the provision of appropriate facilities for outdoor sport and outdoor recreation and the replacement of a building provided that the new building is the same use and not materially larger than the one it replaces.
- 4.82 The second part of Policy MEL12 sets out the policy for development on Local Green Spaces in effect to not permit built development except for limited development required to enhance the role and function of the Local Green Space and secondly to develop the community infrastructure under Policy MEL9.
- 4.83 I consider that the proposals under Policy MEL9 are unlikely to accord with the exceptional forms of development set out in Green Belt policy in NPPF paragraph 89. If this proposal is to go ahead it would be inappropriate to designate the area as a Local Green Space.
- 4.84 I have raised the potential conflict between designating the Melton Road Playing Fields as a Local Green Space and the proposals under Policy MEL9 for a new community hall with the Qualifying Body. In order to resolve this conflict, the Qualifying Body has agreed that the Playing Fields should be designated as a “Safeguarded Open Space” with a policy that would be subject to the final bullet points under Policy MEL12 to enable the development of the proposals under MEL9 and other development appropriate to its use for outdoor sport and recreation.
- 4.85 It is considered that the policy for development on Local Green Space as set out in the second part of Policy MEL12 does not fully accord with national policy in NPPF in paragraphs 87 - 89. The recommendation is to revise it to state that development will only be acceptable in very special circumstances as set out in the NPPF.
- 4.86 Subject to the recommended modifications, it is considered that the policy will satisfy the Basic Conditions.

Recommendation 7: Revise Policy MEL12 as follows:

Delete the first bullet “Playing Fields on Melton Road” and the final bullet point.

Add a new bullet point “Burkes Wood”. Include a description of the woodland under paragraph 7.8.

Delete the second paragraph and last two bullet points and replace with:
“Proposals for development on these Local Green Spaces will only be permitted in very special circumstances in accordance with national policy on Green Belts.”

Include a new paragraph stating “*The Playing Fields on Melton Road are designated as Safeguarded Open Space. Development within the area will only be acceptable where it delivers the proposals set out in Policy MEL9 or to enhance the use of the area for outdoor sport, play and recreation. Development should not result in the loss of sports pitches or play areas unless they are to be replaced elsewhere on the site.*”

Revise the title of Policy MEL12 to “Protection and Maintenance of Green Spaces”

Revise the key to the Proposals Map to rename the policy and differentiate between Local Green Space and Safeguarded Open Space.

Include Burkes Wood on the Proposals Map as a Local Green Space.

Policy MEL13: Protection of Trees and Rural Character

- 4.87 Policy MEL13 seeks to safeguard the rural and wooded character of a significant area between Melton Village and Woodbridge. The policy seeks to take forward the principles of Saved Policy AP237.
- 4.88 During my site visit, I visited all parts of the area and that covered by Policy MEL17. There are some fine mature trees within the area particularly along the boundaries of the area. Burkes Wood also provides a wooded backdrop and is an accessible area of woodland that appears to be well used by local residents. However most of the area shown on the Proposals Map under Policy MEL13 is a residential area containing modern housing estates of varying ages and styles. The trees within the housing estates are mainly ornamental. There are few, if any, areas that are undeveloped. The Qualifying Body has confirmed that all the woodland trees are protected by a Tree Preservation Order.
- 4.89 The first part of the policy states that there are parts of the area where no further development is to be permitted and the reasons for this. It is considered that this part of the policy is unclear and imprecise. It refers to preventing the coalescence of Woodbridge and Melton Village; however most of the area shown on the Proposals Map is already developed. Further it refers to preserving the area within the conservation area although the area covered by MEL13 does not include the conservation area. Policy MEL17 covers those areas that are to be protected from development.
- 4.90 The final part of the policy sets out the requirement for development to be designed and laid so as not to prejudice the protection of important trees and open spaces and requiring additional tree planting and landscaping where

appropriate. These are all matters that are addressed in the requirements covering trees protected by a tree preservation order. It is recommended that some flexibility be introduced in the policy and the clarity be improved about when additional tree planting will be appropriate.

- 4.91 Paragraph 7.23 proposes that extensions to existing tree preservation orders may be necessary to safeguard natural features. I agree that this would be the most appropriate means of protecting important trees in the area.
- 4.92 In order to improve the clarity of the policy and ensure that it is not ambiguous, so as to be capable of being interpreted consistently by decision makers, it is recommended that that part of the policy that restricts further development should be deleted. Subject to the modification, it is considered that the policy will satisfy the Basic Conditions.
- 4.93 I have made a recommendation to delete Policy MEL17 and suggested that the Leeks Hill and Melton Grange should be safeguarded under Policy MEL13. The recommendation includes the consequential amendment to the Proposals Map.

Recommendation 8: Revise Policy MEL13 as follows:

Revise paragraph 1 as follows: “New development within the area bounded byshould help to retain the rural and wooded character of area.” Delete the second sentence and bullet points.

Revise the final paragraph to read “Proposals for development *should* ensure that the design..... of any new development *will ensure that* important trees and open spaces are *safeguarded*. *Where trees are removed as a result of the development they should be replaced in a location to be agreed.*”

Include the Leeks Hill and Melton Grange residential areas under Policy MEL13 on the Proposals Map.

Policy MEL14: Retention of Riverside Qualities

- 4.94 Policy MEL14 sets a presumption against further expansion of riverside development into the area shown on the Proposals Map. The policy takes forward the principle set in Saved Policy AP249 which seeks to prevent further expansion of riverside development in order to protect the character of the riverside. The area covered by Policy MEL14 is the same as that by Policy AP249.
- 4.95 The area shown on the Proposals Map is an undeveloped area to the southwest of the sewage treatment works. It is one of the few undeveloped areas of riverside frontage close to Melton and Woodbridge. There are boatyards and jetties to the north and south of the area as well as some small

scale employment development and new housing development to the south of the area.

- 4.96 The River Deben is a high quality environment within the AONB and is a designated as a nature conservation site of international importance. It is considered therefore that the restriction on development proposed by this policy is justified as part of measures to safeguard the high quality of the natural environment.
- 4.97 In response to my question, the Qualifying Body has confirmed that riverside development is defined as that which requires a riverside location such as boatyards, moorings and sailing facilities. It would be helpful to plan users to include this definition in the justification and to explain the importance of keeping this area undeveloped.
- 4.98 A representation has been received that states that Policy MEL14 should differentiate between luxury riverside housing and sailing facilities.
- 4.99 It is considered that this restrictive policy is justified by the local environmental designations and it meets the Basic Conditions.

Policy MEL15 Residential Boats

- 4.100 Policy MEL15 seeks to prevent the mooring of additional residential houseboats along a stretch of the River Deben or the renewal of consent for existing residential houseboats where it would result in or perpetuate serious visual intrusion.
- 4.101 Paragraph 7.30 refers to Saved Policy AP241 on houseboats. However this policy was deleted on the adoption of the Site Allocations DPD and reference to it should therefore be deleted from paragraph 7.30. Instead reference should be made in the justification to Policy SP15 on the importance of the conservation of the Deben Estuary.
- 4.102 The policy builds on the work undertaken by the AONB partnership on the Deben Estuary Plan 2015 to improve the management of the environment of the area. The aim of the Plan is to seek to ensure that residential boats do not have a negative impact on the natural environment and respect the habitat.
- 4.103 Two representations have been received seeking the deletion of Policy MEL15 as it is considered to be ambiguous and draconian.
- 4.104 The policy refers to planning permission being granted or not granted. Paragraph 3.11 above explains that this form of wording is not appropriate for a neighbourhood plan.
- 4.105 The recommendation is made to improve the clarity of the wording of the policy. Subject to the modifications it is considered that the policy will satisfy the Basic Conditions.

Recommendation 9: Revise Policy MEL15 as follows:

No additional moorings for residential houseboats will be approved on the section of the River Deden between Wilford Bridge and the boundary of the Neighbourhood Plan area in the direction of Sun Wharf at Woodbridge as shown on the Proposals Map.

Within that area, the replacement of a residential houseboat on an existing mooring with one that is substantially different in size and form should not have a serious adverse impact on visual amenity or the natural habitat of the area.

Heritage and Conservation

Policy MEL16: Melton Conservation Area

- 4.106 Policy MEL16 provides more detailed considerations to support the control of development in the Melton Conservation Area. Local Plan Policy SP15 sets out the strategic policy for heritage. A Conservation Area Appraisal was adopted as SPD in June 2010.
- 4.107 The first paragraph of the policy refers to the District Council paying special attention to particular matters. As the policy will be applicable to and used by landowners and developers as well as those determining planning applications, it is considered inappropriate to refer to the District Council specifically in the policy. A recommendation is made to improve the clarity of the wording of the policy.
- 4.108 A representation has been made that the policy is not compliant with paragraphs 128 – 132 of the NPPF.
- 4.109 These paragraphs relate to the determination of planning applications affecting a heritage asset. It is considered that the proposals in Policy MEL16 (as modified) would support the preservation and enhancement of the conservation area by setting out locally important design considerations.
- 4.110 Subject to the modifications it is considered that the policy will satisfy the Basic Conditions.

Recommendation 10: Revise the first paragraph of Policy MEL16 as follows:

“New buildings or alterations or other development within or affecting the setting of the Melton Conservation Area should be designed and located to preserve and enhance the qualities of the conservation area. Special attention should be paid to:”

Policy MEL17: Areas to be Protected from Development

- 4.111 Policy MEL17 takes forward the principle of Saved Policy AP28 which aims to safeguard important open areas within the Physical Limits Boundaries. Two areas are identified within the southern part of the parish.
- 4.112 The northern area contains Burkes Wood and some very low density housing on Leeks Hill. The southern area contains the former Melton Grange and an area of housing around it. The only remaining undeveloped area is the lawn in front of the Grange.
- 4.113 A representation has been received that there is insufficient evidence to support the restrictions of the policy and to explain the circumstances where development will be permitted.
- 4.114 It is considered that the wording of the policy which “severely restricts” development is unclear and imprecise and does not reflect the exceptions described in the justification. It is not supported by robust evidence. It is considered that the policy does not satisfy the Basic Conditions as it has not had regard to national policy and should therefore be deleted.
- 4.115 It is considered that the character of the Leeks Hill and Melton Grange residential areas is similar to the surrounding area and it would be appropriate to safeguard the areas and the footpath links through the revised Policy MEL13.
- 4.116 As discussed under Policy MEL11, Burkes Wood is comparable to the Hospital Grove wood and it is considered that it would be appropriate to safeguard it under Policy MEL11 as a Local Green Space.

Recommendation 11: delete Policy MEL17.

Policy MEL18: Character Areas

- 4.117 The policy sets out a number of design factors to be taken into account in the design of development throughout the plan area. Development proposals are required to demonstrate how they contribute positively to the features of the respective character areas. The Melton Character Area Assessment describes the topography, landscape and features of the built development in six built up areas within the parish. It assessment does not cover the rural countryside areas.
- 4.118 The policy seeks to secure a high quality design and a good standard of amenity for existing and future occupants of property as well as conserving the local heritage. It is considered that the policy satisfies the Basic Conditions and no modifications are recommended.
- 4.119 A representation has been received that puts forward revised wording for the Character Assessment. These are factual revisions and do not affect

consideration of the policy against the Basic Conditions. The Qualifying Body may wish to consider the details of the points made.

Commercial and Retail

Policy MEL19: General Employment Areas

- 4.120 This policy seeks to take forward the saved Policy AP51 to identify the area between Wilford Bridge Road and Dock Lane as a general employment area for Classes B1, B2 and B8 uses.
- 4.121 It is noted that the area is not identified as a General Employment area in the Site Allocations DPD.
- 4.122 NPPF paragraph 22 states that “*planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purpose. Where there are no reasonable prospects of a site being used for the allocated employment use, applications for alternative uses of land or buildings are to be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.*”
- 4.123 Paragraph 28 of the NPPF states that a positive approach should be taken to support the sustainable growth and expansion of all types of business and enterprise in rural areas,
- 4.124 The area has been developed primarily for business and industrial uses. There are a number of employment and business uses in the area that do not fall within the use classes (B1, B2, B8) set out in the policy including some retail uses, a veterinary surgery and a motor parts business. The areas shown on the Proposals Map includes the station buildings which are now in retail use and the station car park. The Proposals Map is incorrectly drawn and includes the road adjacent to the site.
- 4.125 Policy MEL19 makes reference to other policies in the Neighbourhood Plan or Local Plan for the area overriding this policy. However, neither Plan includes policies relating to the area, so this reference in the policy is superfluous and confusing and should therefore be deleted. The policy should be updated to reflect the advice in the national guidance to support all types of business with suitable safeguards to ensure that they do not impact adversely on existing industrial uses by the introduction of sensitive uses.
- 4.126 The recommendation is proposed to ensure that the policy is clear and unambiguous and has regard to national policy to support rural enterprise. Subject to the modification the policy will meet the Basic Conditions.

Recommendation 12: Revise Policy MEL19 to read:

“The land between Wilford Bridge Road and Dock Road identified on the Proposals Map is identified as a General Employment Area where the

development within Use Classes B1, B2 and B8 should be located. Other employment uses may be located in the area where it is demonstrated that there is no other appropriate location and the development will not involve a sensitive use that would impact on the operation of an existing employment use.”

Revise the Proposals Map to exclude the road adjacent to the station.

Policy MEL20: Deben Mill

- 4.127 Policy MEL20 identifies the site to the north of Deben Mill as suitable for B1 uses only and promotes a high standard of design and landscaping for any new buildings. A triangular area of land at the north-eastern edge of the site has been excluded from the physical limits boundary and is safeguarded for amenity/water storage, open space or parking.
- 4.128 The Deben Mill site has been redeveloped mainly for residential use with a small area at the north-eastern corner for B1 offices. The triangle of land outside the physical limits boundary is retained as amenity/water storage area. The policy seeks to ensure that the business use and open land uses are retained on the site.
- 4.129 The policy as written refers to the development of the site for B1 use and requiring a high standard of design. However, building work is approaching completion and it would be more appropriate to refer to the retention of the use of the buildings for B1 uses.
- 4.130 The Proposals Map incorrectly shows the whole of the Deben Mill site and should be amended to show only the business/office building and the open land.
- 4.131 Subject to the modifications, it is considered that the policy satisfies the Basic conditions.

Recommendation 13: revise Policy MEL20 to read:

“Land and buildings within the Deben Mill site shown on the Proposals Map shall be developed and retained for B1 employment uses only.”

Delete the first sentence of paragraph 2 of the policy.

Revise the boundary of Policy MEL20 on the Proposals Map to indicate only the business area and open area.

Land off Wilford Bridge Road

Policy MEL21: Land off Wilford Bridge Road

- 4.132 This policy seeks to allocate a site of 9.7 ha of land for mixed use of residential, B1 employment uses and community uses. There are proposals for 55 dwellings of which one third are to be affordable to contribute towards the housing requirement. The employment area is to accommodate the new District Council offices and B1 serviced business space with ancillary small scale retail development. Green space is to be provided on an area subject to flooding, to accommodate a lake to manage surface water and the community uses identified under Policy MEL10. The policy is explicit about ensuring that the new development does not lead to an increase in pedestrian use of the Deben Estuary SPA and provides an alternative recreational area for local residents as highlighted in the HRA.
- 4.133 The western part of the site is a former employment area that has been vacant for some time. The Council offices and some business units have been completed. A second parcel of land to the east of this identified for business uses is vacant and has been cleared.
- 4.134 The area to be allocated for housing development is currently greenfield land and contains a number of trees and hedgerows. The description of the site in paragraph 10.1 is inaccurate and does not make reference to part of the site being greenfield.
- 4.135 When allocating sites for development in a neighbourhood plan, the PPG advises that the qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria.
- 4.136 The Sustainability Appraisal assessed the option of the development of the site against the option of not developing the site. The commentary on the assessment of the overall scale of growth and growth options in paragraphs 7.25 – 7.31 of the Sustainability Appraisal noted that "*The Neighbourhood Plan invited landowners and site promoters to put land forward for consideration for allocation. The only land that was put forward was the land off Wilford Bridge Road and land at Yarmouth Road. The former has been proposed for allocation in the Plan and the Sustainability Appraisal, earlier in this section, shows that the site represents a sustainable option. The latter land is detached from the physical limits boundary and the scale of growth that the site would potentially accommodate would put significant additional pressure on the Deben Estuary SPA. It would also have the potential to have a detrimental impact on the Melton Hill Air Quality Management Area.*"
- 4.137 It also noted that the Sustainability Appraisal of the Site Allocations and Area Specific Policies DPD assessed alternative options for growth including extending physical limits boundaries further.
- 4.138 I am satisfied that an assessment of the sustainability of the development options has been undertaken as part of the Sustainability Appraisal.

4.139 A number of representations have been received. The comments made are summarised as follows:

- Doubts the deliverability of 55 houses on the site at Wilford Bridge Road.
- The site allocation process is unclear. The reasons for allocating the Wilford Bridge Road rather than the Yarmouth Road site should be made clear.
- The housing site is greenfield and not brownfield as stated in publicity.
- Two thirds of the Wilford Bridge Road site is marsh and shrub land forming part of the flood plain and designated a zone 3 flood risk area. There has been no assessment of the impact of building on the land on flood risk or the water table. The impact of climate change has not been taken into account in the plan; this site provides a flood storage area.
- There are a number of protected species on the site and veteran trees.
- Conflict in the development of housing and the designation of the site as a Special Landscape Area.
- Impact on views of the AONB from the adjacent footpath.
- Concerns about access to the proposed area of development, and the possible use of St Andrews Place as a secondary exit.
- Infrastructure needs to be in place to serve the development.
- Proposing the allocation of land on Woods Lane to the east of the land granted planning permission as a reserve site.

4.140 The Environment Agency has commented to say they support paragraph 10.6 and welcome that housing is mostly located on sites in Flood Zone 1. However it is noted that some housing is shown in Flood Zone 3. Any proposals in this area will only be acceptable if they are accompanied by a flood risk assessment that demonstrates that the development will be safe and will not increase flood risk elsewhere. It is noted that Flood Zones do not take account of climate change, so it is considered likely that more of the site may be at risk in the future.

4.141 The RSPB objects to the allocation due to the lack of evidence that this (alone or in-combination with other housing developments in the area) will not result in adverse effects on the integrity of the Deben Estuary SPA and Ramsar site through increases in recreational pressure. Provisions are required to ascertain that any mitigation requirement is incorporated into the strategic mitigation scheme for recreational impacts on European sites currently under development by local Councils.

4.142 The RSPB comments that the Habitats Regulations Assessment (HRA) makes reference to the strategic mitigation scheme for impacts on international sites resulting from increased recreational pressure which is under development for Suffolk Coastal District Council, Babergh District Council and Ipswich Borough Council. They agree that this could be an appropriate mechanism by which to provide mitigation, however, the Plan should also state that developer contributions towards the strategic mitigation scheme will be required in order to ensure that the mitigation provided at the

strategic level incorporates that required for Policy MEL21. It should also be noted that these would need to be secured through appropriate planning agreements. Without these provisions, it cannot reliably be concluded that any impacts from this proposal would be mitigated through the strategic mitigation scheme, and therefore adverse effects on the integrity (AEOI) of the Deben Estuary European sites cannot be ruled out.

- 4.143 Further they comment that the Plan should also state that any application coming forward on this allocation site should be subject to HRA at the project level (as well as the strategic level). This is because a much greater level of detail will be available regarding the proposals at this stage, including the number of dwellings, the site layout and public access provisions. The proponent will need to "*provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable them to determine whether an appropriate assessment is required*" (Reg. 61 of the Habitats Regulations 2010 (as amended)).
- 4.144 The Suffolk Wildlife Trust says that the policy should also include reference to any development at this site not having an adverse impact on Protected Species and Priority Species and Habitats. The policy should also seek to retain any habitats of biodiversity value already present on the site.
- 4.145 The Wildlife Trust comments that the Neighbourhood Plan and accompanying HRA should acknowledge the Recreational Avoidance Mitigation Strategy (RAMS) which is currently being prepared by Suffolk Coastal DC (in partnership with Ipswich Borough DC and Babergh DC). It should be ensured that measures identified in the Neighbourhood Plan do not conflict with or duplicate measures to be secured through the RAMS.
- 4.146 Environmental organisations have raised concerns about the need to minimise the impact of the development on the internationally important Deben estuary, to safeguard habitats on the site and to ensure that the development is designed to avoid flood risk through the inclusion of a flood alleviation lake. It is recommended that the suggestions raised should be incorporated into the policy requirements.
- 4.147 During the examination, I received a copy of highway comments on a planning application for a care home and 34 dwellings on land at Crown Nurseries, Crown Street, Ufford. The comments stated that recent analysis of the junction of the A1152 Woods Lane / B1438 The Street / Wilford Bridge Road / B1438 Melton Road (the Melton Crossroads) has indicated that it is at capacity and even modest increases in traffic flows may result in severe congestion.
- 4.148 Their comments that the Melton crossroads is at capacity raised the issue of the deliverability of the proposed allocation at Wilford Bridge Road. The PPG states that proposals in neighbourhood plans need to be deliverable and should not be subject to a scale of obligations and policy burdens that their ability to be delivered affects viability.

- 4.149 In view of these comments, I asked the Local Planning Authority to confirm that the proposals as set out in Policy MEL21 would be acceptable to the Highways Authority and whether the Melton Crossroads could accommodate this scale of development proposed and the nature of the mitigation measures that would be required.
- 4.150 The response was that “*Although no specific cumulative impact study was carried out on the highway network at the time of the original consultation for this site allocation, the Qualifying Body was involved (along with others) in various meetings and email exchanges about the feasibility of it from a Highways point of view. Some residual highways capacity was in place at that time.*
- “The specific impact of the site allocation in the Melton Neighbourhood Plan would need to be demonstrated and mitigated in the Transport Assessment or Statement, when it comes forward for planning permission and this cannot happen until the Neighbourhood Plan is actually made.*
- “The key highways constraint in the Melton area is the A1152 Melton Crossroads. However there is a potential mitigation scheme to provide additional highways capacity to facilitate this development. Therefore if the Wilford Bridge Road site carried out such a mitigation scheme it would unlock limited additional capacity.*
- “It also should be noted that part of this brownfield allocation has an authorised use now as a B8 haulage yard which generates HGV traffic. This current traffic is in the baseline assessment of the crossroads capacity and would disappear if this proposed site allocation were to come forward. Traffic generated by the site allocation would be less environmentally detrimental and better in terms of highways safety. This proposed site allocation also proposes a re-alignment of the A1152 and railway crossing which will benefit the community in terms of road safety and congestion. Additional parking for the station is also part of this proposal and will alleviate congestion, especially at peak commuter times of the day. The net benefit of this site allocation is therefore positive.”*
- 4.151 The policy has brought together a package of proposals that will deliver new housing, business, open space and community proposals that have been identified through the preparation of the Neighbourhood Plan. The site is not without its difficulties and these have been recognised through the policy requirements. The Local Planning Authority and Highways Authority have confirmed that mitigation measures are possible to unlock limited additional capacity at the Melton crossroads and the net benefit of the site allocation is considered to be positive. Subject to the modifications, it is considered that the policy satisfies the Basic Conditions.

Recommendation 14: revise Policy MEL21 as follows:

Revise the first paragraph to read; “*Land off Wilford Bridge Road shown on the Proposals Map of 9.4 hectares is allocated for a mixed use*

development of business, residential and open space uses, subject to the following:

Add an additional criterion: "*A project level Habitats Regulation Assessment should be carried out and measures should be secured to ensure that the development does not have an adverse impact on international habitats. Where appropriate, developer contributions should be secured through a planning agreement towards the strategic mitigation scheme for impacts on international sites.*"

Add an additional criterion: "*Development should avoid having an adverse impact on Protected Species and Priority Species and Habitats*".

Revise the second sentence of paragraph 10.1 to read: "*The western part of the site is a former employment site that has been vacant for a number of years; the remainder of the site is greenfield and contains some mature trees and hedgerows.*"

Update the reference to the development of the new District Council offices which have been completed.

Include reference to the "Recreational Avoidance Mitigation Strategy" in the justification to explain its role and how the development of the site could contribute to it: "*The Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy is a means by which sustainable housing growth can be delivered in Suffolk Coastal District, and neighbouring Ipswich Borough and Babergh District, facilitating development whilst at the same time adequately protecting European wildlife sites from harm that could otherwise potentially occur because of increased recreation pressure arising from the new housing growth.*"

5.0 Referendum

- 5.1 The Melton Neighbourhood Plan reflects the views held by the community as demonstrated through the consultations and, subject to the modifications proposed, sets out a realistic and achievable vision to support the future improvement of community.
- 5.2 I am satisfied that the Neighbourhood Plan meets all the statutory requirements, in particular those set out in paragraph 8(1) of schedule 4B of the Town and Country Planning Act 1990 and, subject to the modifications I have identified, meets the basic conditions namely:
- has regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contributes to the achievement of sustainable development;
 - is in general conformity with the strategic policies contained in the Development Plan for the area;
 - does not breach, and is otherwise compatible with, EU obligations and human rights requirements
- 5.3 **I am pleased to recommend to Suffolk Coastal District Council that the Melton Neighbourhood Plan should, subject to the modifications I have put forward, proceed to referendum.**
- 5.4 I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan area. I have considered whether any of the policies and proposals would affect the adjacent community of Woodbridge and In all the matters I have considered I have not seen anything that suggests the referendum area should be extended beyond the boundaries of the plan area as they are currently defined. I recommend that the Neighbourhood Plan should proceed to a referendum based on the neighbourhood area defined by the Suffolk Coastal District Council on 24 December 2013.

6.0 Background Documents

- 6.1 In undertaking this examination, I have considered the following documents
- Melton Neighbourhood Plan Submission Draft Version December 2016
 - Melton Neighbourhood Plan Basic Conditions Statement
 - Melton Neighbourhood Plan Consultation Statement
 - Melton Neighbourhood Plan SEA and HRA Screening Reports and erratum issued 16/03/2017
 - Melton Neighbourhood Plan List of Evidence Report
 - Deben Estuary Plan 2015
 - Melton Conservation Area Appraisal Supplementary Planning Document June 2010
 - Melton Character Area Assessment January 2016
 - National Planning Policy Framework March 2012
 - Planning Practice Guidance March 2014 (as amended)
 - The Town and Country Planning Act 1990 (as amended)
 - The Localism Act 2011
 - The Neighbourhood Planning (General) Regulations 2012
 - Suffolk Coastal District Local Plan Core Strategy and Development Management Policies July 2013
 - Suffolk Coastal District Local Plan Site Allocations and Area Specific Policies Development Plan Document January 2017
 - Suffolk Coastal Local Plan saved policies.
 - Suffolk Guidance for Parking Technical Guidance Adopted November 2014 Second Edition - November 2015

7.0 Summary of Recommendations

Recommendation 1: Revise Policy MEL1 as follows

Delete the fifth bullet point;

Correct the spelling of Coastal in the sixth bullet point.

Recommendation 2: Revise Policy MEL2 as follows:

Delete bullet points 2, 4, 5, 6, and 7 relating to the crossing points and traffic calming measures.

Include a new Community Action clearly differentiated from the neighbourhood development plan policy stating “*The Parish Council will strongly support the following: include bullet points 2, 4, 5, 6, and 7.*

Recommendation 3: Revise Policy MEL3 to read:

“.....a significant **adverse impact** on....from the routes shown on the Proposals Map.”

Include the routes shown on the map in Appendix A of the responses to the Examiner’s Questions on the Proposals Map.

Recommendation 4: that the second paragraph of Policy MEL6 be revised as follows:

“New development that results in the loss of off- or on-road parking spaces **should include adequate parking spaces in accordance with the adopted parking standards.**”

Revise Paragraph 5.28 to read: “*Development proposals that would involve the loss of existing parking provision should ensure that sufficient spaces are made available to serve the development and to make alternative provision nearby for any parking spaces lost.*”

Recommendation 5: that a more detailed Inset Map be included that shows the boundaries of the site referred to in Policy MEL7.

Recommendation 6: revise the second sentence of paragraph 6.5 to read:
“....informal recreation and children’s play.”

Recommendation 7: Revise Policy MEL12 as follows:

Delete the first bullet “Playing Fields on Melton Road” and the final bullet point.

Add a new bullet point “Burkes Wood”. Include a description of the woodland under paragraph 7.8.

Delete the second paragraph and last two bullet points and replace with:
“*Proposals for development on these Local Green Spaces will only be*

permitted in very special circumstances in accordance with national policy on Green Belts.”

Include a new paragraph stating “*The Playing Fields on Melton Road are designated as Safeguarded Open Space. Development within the area will only be acceptable where it delivers the proposals set out in Policy MEL9 or to enhance the use of the area for outdoor sport, play and recreation. Development should not result in the loss of sports pitches or play areas unless they are to be replaced elsewhere on the site.*”

Revise the title of Policy MEL12 to “Protection and Maintenance of Green Spaces”

Revise the key to the Proposals Map to rename the policy and differentiate between Local Green Space and Safeguarded Open Space.

Include Burkes Wood on the Proposals Map as a Local Green Space.

Recommendation 8: Revise Policy MEL13 as follows:

Revise paragraph 1 as follows: “*New development within the area bounded byshould help to retain the rural and wooded character of area.*” Delete the second sentence and bullet points.

Revise the final paragraph to read “*Proposals for development should ensure that the design..... of any new development will ensure that important trees and open spaces are safeguarded. Where trees are removed as a result of the development they should be replaced in a location to be agreed.*”

Include the Leeks Hill and Melton Grange residential areas under Policy MEL13 on the Proposals Map.

Recommendation 9: Revise Policy MEL15 as follows:

No additional moorings for residential houseboats will be approved on the section of the River Deden between Wilford Bridge and the boundary of the Neighbourhood Plan area in the direction of Sun Wharf at Woodbridge as shown on the Proposals Map.

Within that area, the replacement of a residential houseboat on an existing mooring with one that is substantially different in size and form should not have a serious adverse impact on visual amenity or the natural habitat of the area.

Recommendation 10: Revise the first paragraph of Policy MEL16 as follows:

“New buildings or alterations or other development within or affecting the setting of the Melton Conservation Area should be designed and located to preserve and enhance the qualities of the conservation area. Special attention should be paid to:”

Recommendation 11: delete Policy MEL17.

Recommendation 12: Revise Policy MEL19 to read:

"The land between Wilford Bridge Road and Dock Road identified on the Proposals Map is identified as a General Employment Area where the development within Use Classes B1, B2 and B8 should be located. Other employment uses may be located in the area where it is demonstrated that there is no other appropriate location and the development will not involve a sensitive use that would impact on the operation of an existing employment use."

Revise the Proposals Map to exclude the road adjacent to the station.

Recommendation 13: revise Policy MEL20 to read:

"Land and buildings within the Deben Mill site shown on the Proposals Map shall be developed and retained for B1 employment uses only."

Delete the first sentence of paragraph 2 of the policy.

Revise the boundary of Policy MEL20 on the Proposals Map to indicate only the business area and open area.

Recommendation 14: revise Policy MEL21 as follows:

Revise the first paragraph to read; "Land off Wilford Bridge Road shown on the Proposals Map of 9.4 hectares is allocated for a mixed use development of business, residential and open space uses, subject to the following:"

Add an additional criterion: "A project level Habitats Regulation Assessment should be carried out and measures should be secured to ensure that the development does not have an adverse impact on international habitats. Where appropriate, developer contributions should be secured through a planning agreement towards the strategic mitigation scheme for impacts on international sites."

Add an additional criterion: "Development should avoid having an adverse impact on Protected Species and Priority Species and Habitats".

Revise the second sentence of paragraph 10.1 to read: "The western part of the site is a former employment site that has been vacant for a number of years; the remainder of the site is greenfield and contains some mature trees and hedgerows."

Update the reference to the development of the new District Council offices which have been completed.

Include reference to the "Recreational Avoidance Mitigation Strategy" in the justification to explain its role and how the development of the site

could contribute to it: "The Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy is a means by which sustainable housing growth can be delivered in Suffolk Coastal District, and neighbouring Ipswich Borough and Babergh District, facilitating development whilst at the same time adequately protecting European wildlife sites from harm that could otherwise potentially occur because of increased recreation pressure arising from the new housing growth."