



Hopkins Homes Ltd  
Melton Neighbourhood Plan  
Representations

March 2017

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Hopkins Homes Ltd is an independent residential development company with its office premises in the Parish of Melton at Melton Park where the company has **refurbished and redeveloped the former St Audry's Hospital site.**

The Company has built homes and business premises in Melton, Woodbridge and throughout Suffolk Coastal District. It also has a number of other land interests and active developments throughout Suffolk.

It employs 150 people of which 60 are based at its Head Quarters at Melton Park House.

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## 1.0 Background

1.1 This statement is intended to provide comments on the Submission Draft Melton Neighbourhood Plan in terms of both the planning process and the content and objectives of the plan. It follows representations to the Draft Plan in September 2016. Those earlier representations were not replied to or actioned. Indeed, the Neighbourhood Planning Authority consultation responses table simply states *"Many of the matters raised relate to strategic matters such as objectively assessed housing need, therefore are matters that should be directed to Suffolk Coastal DC. All matters relating to the sustainability of the proposed site allocation and its assessment against other options have been addressed in the Sustainability Appraisal"*. Clearly, there remain specific concerns which have not been addressed by the new plan.

1.2 Whilst the draft Neighbourhood Plan document is well written and contains some well-focussed and interesting community aspirations which may not have been realised by a district-wide document, we have concerns about the robustness of the process and evidence and the failure of the plan to align itself with the current strategic objectives of the district. The plan is similar to other recent and emerging Neighbourhood Plans in that it relies unduly upon out of date district plans and fails to deliver proportionate and necessary growth. Instead the plan opts for a low growth and aspirational approach to issues which is long on aspiration and short on

delivery. We consider that the plan needs to be amended to meet the so called **"basic conditions" required to be satisfied prior to referendum.** The relevant legal conditions are:

- To have regard to national policies and advice,
- To contribute to the achievement of sustainable development,
- To conform with the strategic policies contained in the development plan,
- To comply with prescribed matters.

Paragraph 009 of the National Planning Practice Guidance of March 2014 (NPPG) underlines the difficulty here:

*"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. A draft Neighbourhood Plan or Order is not tested against the policies in an emerging Local Plan although the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested".*

1.3 *"Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:*

- *the emerging neighbourhood plan*
- *the emerging Local Plan*
- *the adopted development plan*
- *with appropriate regard to national policy and guidance.*

*The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination".*

1.4 The District Local Plan is the 2013 Suffolk Coastal Core Strategy. However, that Local Plan is out of date in relation to housing policy because it expressly confirms that it is to be reviewed prior to the end of 2015. The purpose of the shortened lifespan of the Core Strategy was to allow a very speedy review to produce a revised plan which would plan appropriately for the full Objectively Assessed Needs for new housing up to 2027. No such review has taken place. The 2013 Core Strategy relied on a lesser district wide housing figure (7900 homes) than the true figure (11,000 homes). Given that there is a national priority **"to boost significantly the supply of new homes"** it is imperative that the District Council uses its Objectively Assessed Need (OAN) as a minimum base from which to plan housing growth. The district is not planning in this way and, although this is a matter for them, the neighbourhood plan must plan to share strategic growth and accord with national policy.

1.5 In the unfortunate environment where the District Council is not maintaining an adequate supply of deliverable housing land in tune with its OAN, National Policy is quite clear that any Local Plan and

Neighbourhood Plan will be regarded as Out of Date in respect of its Housing Policies. Thus the draft Neighbourhood Plan, being based upon poor strategic advice and sub-minimal housing needs will be out of date even prior to its adoption.

- 1.6 **Paragraph 1.1 of the Neighbourhood Plan states** "It represents one part of the development plan for the parish over the period 2016 to 2030, the other part being the 2013 Suffolk Coastal District Local Plan". **This** statement is incorrect because the 2013 plan extended only to 31<sup>st</sup> December 2015. Again, in paragraph 1.7, the Neighbourhood Plan states "The relevant Suffolk Coastal District Local Plan was adopted in 2013 and, under the guidance provided by the NPPF, is up to date". This is also incorrect.
- 1.7 The neighbourhood Plan cannot be in conformity with the 2013 Core Strategy because that plan is out of date in two respects. Firstly, it is out of date, de facto, because it has outlived its first review date which was at the end of 2015. Secondly, it is out of date in respect of its housing land supply policies because the District Council cannot demonstrate a 5 year supply of housing land aligned to its Objectively assessed Need. The LPA was so acutely aware of the failure to plan for its OAN as required by the NPPF that the "adoption" version of its Core Strategy promised to review the housing growth strategy by 2015 no less than 12 times\* throughout the document. (see Notes 1-12 below)

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#### \* Notes

- <sup>1</sup> **Foreword** – "that conclusion [that the plan is sound] is subject to our commitment to an early review of the Plan, with full up-to-date evidence, commencing no later than 2015, to ensure in particular that provision of new housing is appropriate over the entire plan period"
- <sup>2</sup> **Preface** – "To address the deficit, the Core Strategy therefore contains a commitment to commence a review by 2015"
- <sup>3</sup> **Para 1.16** – "...commitment to a review of the document to commence by 2015."
- <sup>4</sup> **Para 1.20** – "The strategic levels of housing and employment set out in this Core Strategy, and the commitment to a review of the Core Strategy to commence by 2015, represent the locally determined approach to development in the district to 2027."
- <sup>5</sup> **Para 2.07** – "That review will commence with the publication of an 'Issues and Options' document by 2015"
- <sup>6</sup> **Table 3.1-** "A review of the CS will commence by 2015 to consider and identify land to meet the current acknowledged shortfall between the locally assessed requirement and the OE objectively assessed need as part of evidenced need for the district to 2031"
- <sup>7</sup> **Para 3.28** – "The adopted approach to the supply and distribution of land for new homes is therefore accompanied by a commitment to commence a review of the plan by 2015. The proposed review will begin with the publication of an 'Issues and Options' document and look to identify land to meet the acknowledged shortfall in provision compared to assessed need as well as any additional need arising by extending the plan period to 2031".
- <sup>8</sup> **Para 3.33** – "between adoption of the Core Strategy and the adoption of the subsequent site allocations document (2015), larger housing sites will need to be brought forward to achieve a five- year housing land supply"
- <sup>9</sup> **Policy SP2** – "An early review of the Core Strategy will be undertaken, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed housing needs for the District and proposals to ensure that this is met in so far as this is consistent with policies in the National Planning Policy Framework"
- <sup>10</sup> **Para 4.35** – "The Council is committed to an early review of the plan commencing with the publication of an Issues and Options document by 2015"

- <sup>11</sup> **Para 4.50** - “The review of the plan which is to commence by 2015 may require an alternative approach to be adopted in order to meet the needs of the district in the longer term.”
- <sup>12</sup> **Para 4.65** - “The scale of new housing development will be re-assessed as part of the planned review of the Core Strategy commencing by 2015 having regard in particular to potential new employment opportunities associated with Sizewell”
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## 2.0 The Plan Content and Objectives

- 2.1 Hopkins Homes Ltd has concerns that the Neighbourhood Plan does not have regard to National Policy and Strategic Policies and cannot be fully accepted as contributing to sustainable development as is required paragraph 8 of Schedule 4B to the 1990 Act.
- 2.2 Melton has a long established and unique place in the strategic settlement hierarchy of Suffolk Coastal District. It is a part of Woodbridge town for planning purposes, with paragraph **4.73 of the Core Strategy stating: “The town of Woodbridge is defined by it’s built up** rather than administrative area, which extends into the parishes of Melton and Martlesham. For ease of reference, however, throughout the Core Strategy the town is referred **to as simply ‘Woodbridge’.**” **Policy SP26 of the Core Strategy states that “Further significant expansion of Woodbridge (and Melton) will be sympathetically considered having regard to the local character and key physical thresholds”.** Melton village is also a Key Service Centre with a broad range of facilities to support sustainable development. In short, the planning system encourages growth in sustainable centres well served by infrastructure facilities and public transport. The Neighbourhood Plan misrepresents the significance of Key Service Centres and the Towns in providing for growth.
- 2.3 Paragraph 4.6 identifies that it is the role of the Neighbourhood Plan to define Physical Limits **Boundaries although the District Council’s Core Strategy** also promises to do this.
- 2.4 It is noted that the Neighbourhood Plan contains no policy direction or Physical Limits Boundaries for a significant part of the parish. Hopkins Homes Ltd considers that it would be both unusual and inappropriate to not define “Melton Park” (the area accessed off St Audry’s Park Road) as being part of the settlement. Indeed, this location contains a number of facilities, businesses and 207 homes along with a population of 460 people but the Neighbourhood Plan ignores it. Melton Park sits well within **the overall Settlement Hierarchy of Suffolk Coastal in its own right... being larger than several Local and Key Service Centres.** (Appendix A).
- 2.5 The Neighbourhood Plan should be changed to provide a Physical Limits Boundary for Melton Park as set out in Appendix B to this statement. This should be reflected on the map at page 53 and acknowledged in Policy MEL1. The Submission Draft Plan goes some way to recognising the existence of this area (previously defined in the Suffolk Coastal District

Local Plan Inset 72) by defining it as a particular character area on pages 43 and 54 and at Policy MEL18. Such a boundary has appeared in previous Neighbourhood Plan documentation from 2014 and would provide those residents with security that their homes are not to be regarded as stand-alone isolated countryside properties. Furthermore, the Neighbourhood Plan fails to recognise the existence of planning permission for development off Woods Lane or the proposals for the relocation of Woodbridge Town Football Club.

- 2.6 Policy MEL11 refers to Special Landscape Areas but there is absolutely no evidence base to support the identification of a higher order landscape protection in the plan. National Planning Policy advises against creating local landscape designations, particularly those not supported by evidence. This policy should be deleted.
- 2.7 **The Neighbourhood Plan's aspirations to make use of CIL income are welcomed**, however, further infrastructure should be identified relevant to growth.

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### 3.0 Prescribed Process

- 3.1 Hopkins Homes Ltd has some concerns about the publicity, production and administration of the draft Neighbourhood Plan.
- 3.2 The first draft Neighbourhood Plan was published for public consultation purposes on 1<sup>st</sup> July 2016, which was before the District Council had initiated its Local Core Strategy Review process. The plan presents itself as conforming to an out of date plan but does not conform in several respects.
- 3.3 The Neighbourhood Plan consultation website is biased towards minimising growth and prejudices consultation responses by including the following statement on its opening page: **"New Development Proposal**  
As part of the NP we are required to allocate some housing. This is sensible when we have a proven need for a small amount of affordable housing but it is also sensible because it puts us in a stronger position, once the NP is adopted, to argue against large housing applications which the community do not want and on inappropriate [sic] sites. The current draft idea is just that - a draft idea. Following feedback from our March events we will look at what improvements we can make. You should be aware of the following when looking at this proposal:
- it is on a BROWNFIELD site which in all previous community consultation over the last 3 years has been identified as the place most people would want to see a small amount of development.
  - as a BROWNFIELD site something will eventually be developed there. It is better that as a community we try to shape what this is as much as possible rather than leaving it to fate - we could get something much worse e.g. a lorry park.

- everyone is aware of the traffic issues in Melton. Most of this is due to the huge amount of traffic from the Peninsular which comes directly through Melton. We have very little power to influence this although Melton PC are talking to SCDC and SCC about it and it is a known issue. Despite this we need to find some solutions to the flow of traffic without it necessarily [sic] being a barrier to a SMALL amount of development in the future.

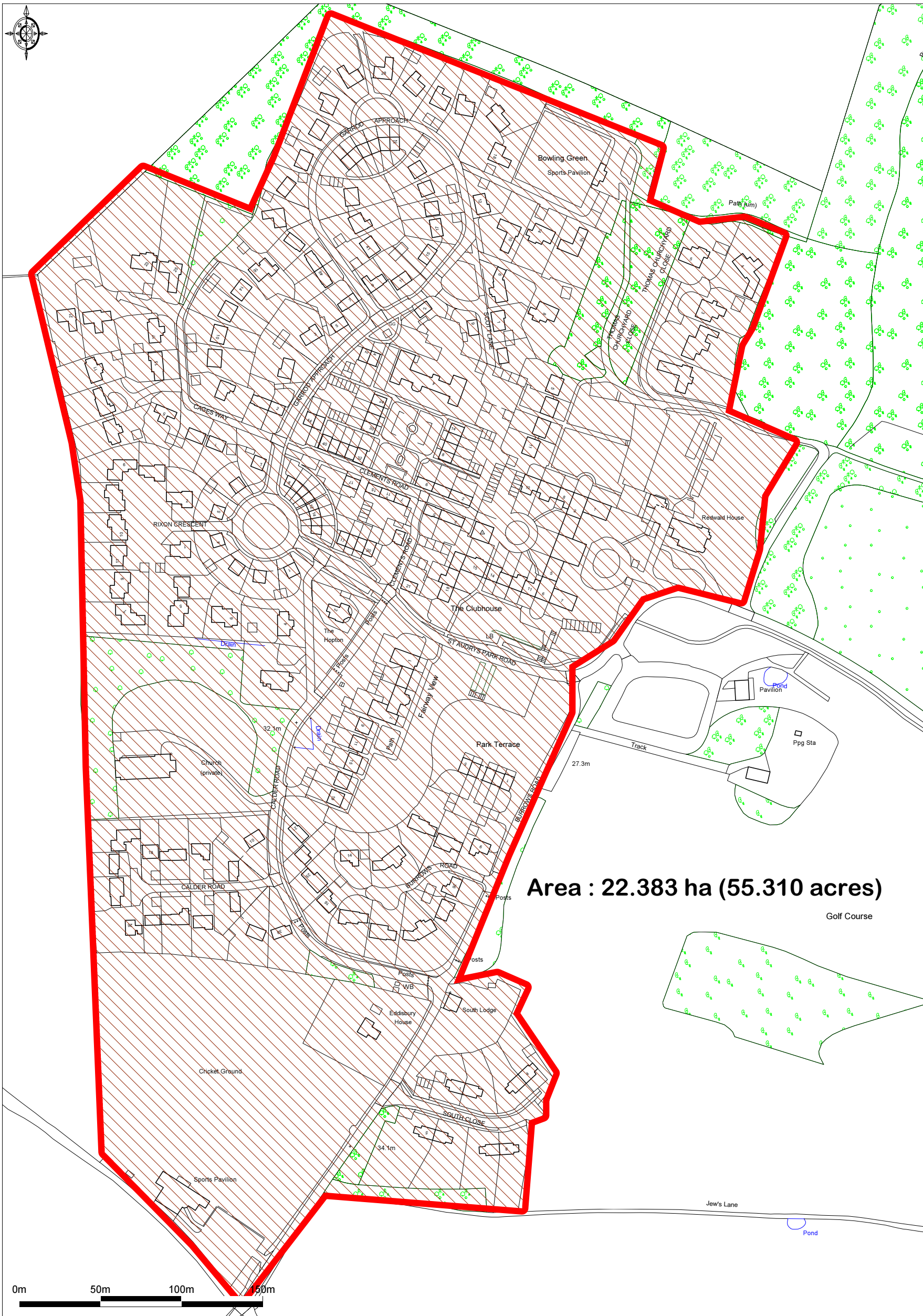
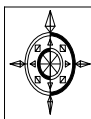
- previous consultation has shown that in Melton we need affordable houses and small business and retail opportunities. Combined with the obvious amenity benefits (park, lake, cafe, farm, allotments etc) we have **tried to provide for both these things with the new proposal."**

- 3.4 Several elements of the above statement are inappropriate or incorrect. Hopkins Homes Ltd supports brownfield development but also has doubts about the delivery of the allocated development and would encourage the Neighbourhood Planners to provide evidence to ensure that the 55 homes are deliverable given the chronic shortage of housing supply in the locality.
  - 3.5 We believe that the consultation should be clearer about the process. Furthermore, the consultation documentation document makes no reference to Objectively Assessed housing Need (OAN), Housing Supply, Housing Delivery Trajectory or shared evidence with the District Council which is publically available.
  - 3.6 The Basic Conditions Statement should explain why the Neighbourhood Plan provides no evidence in relation to housing, proposes no specific development targets for its key site, relies on a housing growth development plan which is formally out of date and ignores the District **Council's** true OAN.
  - 3.7 The publication of details of where and when the plan proposal may be inspected has not been helped by the lack of connection between the NP website and that of the District Council. Today, the link between the Neighbourhood Plan Website and the East Suffolk website does not operate and on the first day of the consultation the same applied. There is concern that the legal requirements of the Neighbourhood Planning (General) Regulations 2012 are not met.
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## SUFFOLK COASTAL

### KEY AND LOCAL SERVICE CENTRE VILLAGES

Key Service Centre Villages		Local Service Centre Villages	
Village	Population	Village	Population
Rendlesham	2,880	Sutton	1,690
Wickham Market	2,220	Kirton	1,140
Grundisburgh	1,580	Kelsale	1,010
Hollesley	1,520	Ufford	960
Knodishall	860	Wenhaston	870
Witnesham	830	Nacton	710
Otley	760	Aldringham	690
Yoxford	700	Benhall	560
Peasenhall/Sibton	680	Bucklesham	540
Snape	640	Tunstall	490
Orford	600	Waldringfield	480
Dennington	590	Badingham	470
<b>Melton Park</b>	<b>460</b>	<b>Melton Park</b>	<b>460</b>
Alderton	420	Lt Bealings	450
Westleton	400	Westerfield	450
Earl Soham	390	Hasketon	420
Eyke	390	Walberswick	390
Bramfield	360	Charsfield	380
Blythburgh	300	Middleton	360
Darsham	280	Hacheston	350
		Campsea Ashe	340



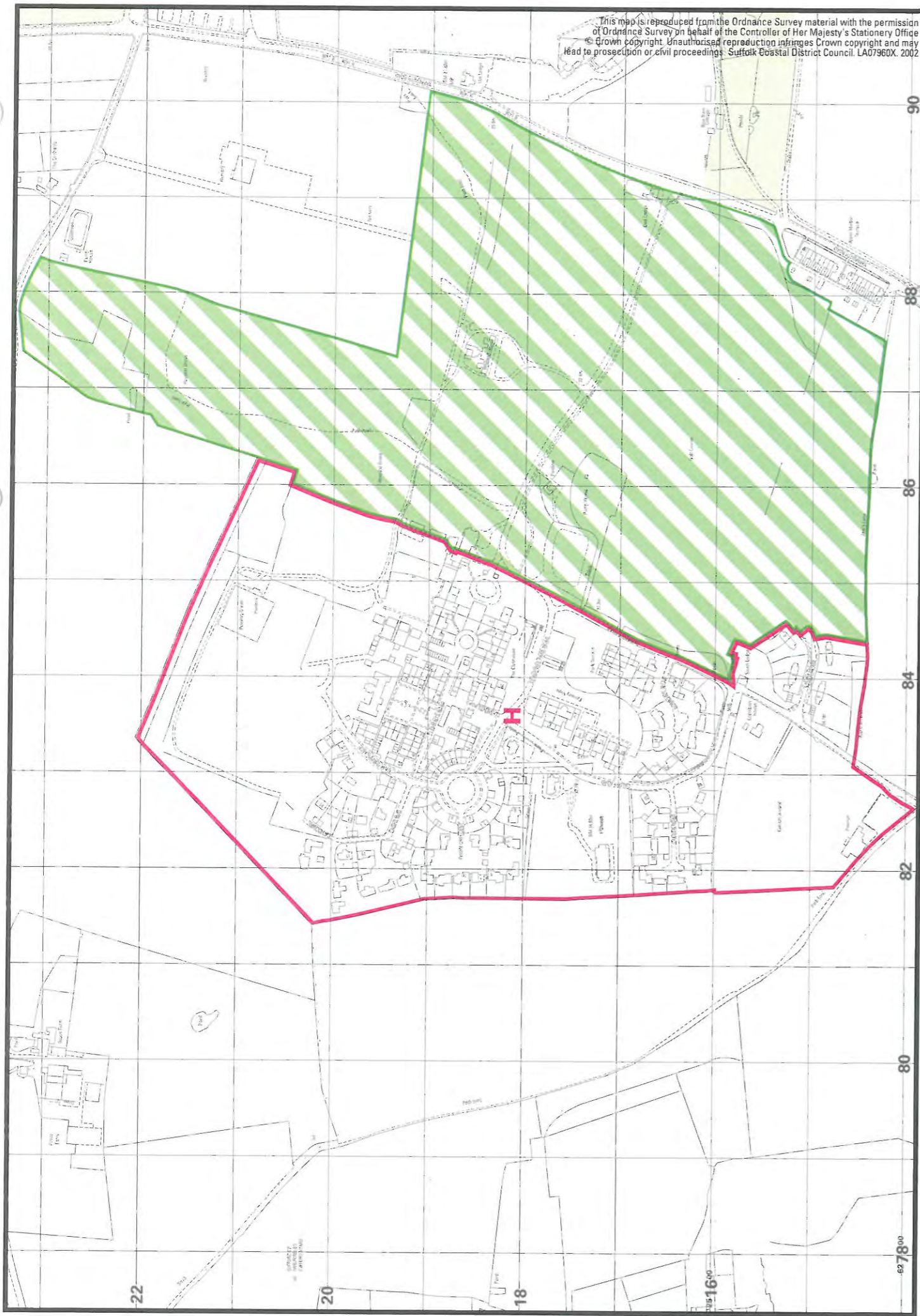
**Area : 22.383 ha (55.310 acres)**

Golf Course

### Melton Park Physical Limits



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Scale: 1:5,000