Martlesham Parish Council – Written Submission relating to the MIQs Matter 3 SCLP 12.25 Q 3.28

Is Policy SCLP12.25 consistent with the policies of the Martlesham Neighbourhood Plan?

The Local Plan is inconsistent with the Martlesham Neighbourhood Plan (MNP) as the MNP shows the Police site as employment land and the MNP does not envisage any changes of use, including but not limited to, the Police site.

Policy SCLP 12.25 contradicts:
- Development within Martlesham Heath MAR 3 (A) (B) & (D) and MNP Policies map 10
- MNP Vision statement 2 (pg. 15 MNP) and MNP paragraph 8.5 (pg. 52) loss of employment sites (please see MIQ matter 3.30)
- Housing Policy MAR 5
- Leisure Use MAR 8
- Non designated heritage assets MAR 12
- Pg. 191 Final Draft Local Plan Recognising Neighbourhood Plans SCLP Table 12.1
  Martlesham has 20 dwellings allocated

Should the Inspector find the Final Draft Local Plan sound (please see our written submission Matter one) we invite the Inspector to consider: -

1. Inconsistencies with the Martlesham Neighbourhood Plan (MNP)

The MNP was based on the agreement with SCDC that Brightwell Lakes would be the principal focus of development in the Parish and that no other large sites would come forward during the life of the MNP. This policy outlined at Para 3.19 pg. 31 of the First Draft Local Plan, was reinforced in meetings with SCDC throughout the evolution of the MNP and more recently at a meeting of the Brightwell Lakes Community forum on 26 October 2018.

It is our contention that SCLP12.25 is inconsistent with the policies of the MNP. MAR 5A (pg. 29 MNP) addresses infill sites as the only sites envisaged by the MNP (in line with Para 3.19 pg. 32 of the First Draft Local Plan)

We contend that the proposals for the site (high density and fairly homogeneous housing types) are based on a restricted and flawed interpretation of the MNP as the designation is a large site not an infill site. Any development other than infill is not governed by the MNP.

Against this background, the objective of MNP MAR5 Policy 5B is to address the needs listed at Policy 5B by prioritising them in infill sites. Provision for these needs in infill sites would increase the diversity of the housing stock. MAR Policy 5B is being misapplied in SCLP 12.25 to create a large area of homogenous housing.

In interpreting housing mix on the Police site, MNP Table 5.1 and paragraph 5.10 (MNP pg. 29) should be considered which envisages a wide range of property types.

It is accepted that Martlesham Heath is a Major Centre in the Settlement Hierarchy (SCLP 3.2) because of the business and retail developments on the east side of the A12. However, the residential part of Martlesham Heath (designed from the outset to be an innovative modern village) on the west side of the A12 is quite distinct in character and separate from the business and retail parks to the east of the A12. Therefore, we argue that it would be appropriate to apply to the police site the principles in SCLP5.1 (housing in large villages) which in any case are broadly consistent with MAR3.
2. Proposed changes

In accordance with the annotation to site 533 to Appendix I of the First Draft Local Plan (SHELAA 2018 ‘Alternative Sites’)

"Whilst the site is identified as potentially suitable in the Draft SHELAA, the Council supports a review of the Neighbourhood Plan as the mechanism for planning for housing development."

our preferred remedy is that Policy 12.25 should be removed as unsound and future use of the land should be remitted to the next review of the MNP.

The developer’s agent in Rep ID 507 is proposing to prepare a Statement of Common Ground (SoCG) with the Council to confirm the delivery of the proposed development. It further says “It is anticipated that the SoCG will include discussions and engagement with the District Planning authority, statutory consultees, and confirm areas of agreement about the scope and content of the proposed development and the delivery of the development against the criteria in Policy SCLP 12.25. Further technical and design work needs to be completed for the proposed development, and key parameters need to be defined including on density, building heights, layout and housing mix.

Neighbourhood Plans are necessarily planning for development. If the site’s change of use is accepted in principle by the Inspector, then Martlesham Parish Council would like the Inspector to instruct the Council to engage cooperatively with the Parish Council on a statement of common ground.

The Parish Council is prepared to input modifications to policy wording including:

- Hamlet layout and density
- Provide care homes
- Provision of elderly housing
- Impact on heritage assets on and near the site
- Affordable housing to the ratio 1:3
- Off street parking
- Maintenance of common assets
- Strategies for preserving protected species on and near the site
- Existing leisure use to be maintained, and
- Compunction through penalties for not securing alternate leisure and open space provision

This alternative remedy is less preferable from the Parish Council’s point of view.

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\[Pg 29\] Martlesham Neighbourhood Plan Made July 2018
\[Pg 34\] Martlesham Neighbourhood Plan Made July 2018
\[Pg 38\] Martlesham Neighbourhood Plan Made July 2018
Martlesham Parish Council Written Submission relating to MiQs Matter 3
Question 3.29
Are there any factors which would mean that the site is not 'deliverable' or 'developable' as per the definitions in the Framework?

The Police site (SCLP12.25) fails to meet the measurement criteria of the NPP Framework. We feel the site is neither deliverable nor developable for a variety of reasons including:

1. We question whether it is sound or compliant to include a site which the landowner has not committed to deliver. On the contrary,

   (i) The Police and Crime Commissioner (PCC) website (July 2019) Please see Appendix 2 for a screen shot of the Police and Crime Commissioner’s website, which as new evidence, states:

   "Our aim is to maximise the value of the site in order to enable the PCC to consider the viability of options. In order to decide if relocation is economically viable we need to obtain a realistic value of the site, which can only be done through the planning process. Even if planning permission is granted there is no guarantee the Constabulary would relocate"

   And at point 5 of the timeline on the same website item...

   "If approved, after a full financial evaluation, the PCC would decide if it were viable to market the site and sell the site to a house builder/developer (Approx. late summer 2019)"

   (ii) The Carter Jonas representation (1441) 2019 as agents for the PCC, acknowledge potential delay when setting out their intention in December 2018:

   "then if [the outline planning permission is successful] to further evaluate the potential market value the site might attract along with all the potential associated relocation costs to an alternative location elsewhere in close proximity to Ipswich, before making a final decision how to progress"

2. Failure to conclude a deal with Grangers PLC (formerly Bradford Property Trust) which holds a legal interest in the value of any of the land sold under Land Registry Title Number SK30795 for development through various restrictive covenants:

   (i) Deed dated 22 June 2010 Dominion Corporate Trustees Limited and Dominion Trust Ltd
   (1) Suffolk Police Authority (2) and Barclays Capital Mortgaging Services Ltd (3)
   (Title SK243601)

   (ii) 99-year Lease dated 20 August 2010 Transformer Chamber at the Police Investigations Centre (Title SK325934)

   (iii) 16th August 2010 Lease Suffolk Police Authority (1) EDF Energy Networks

   (iv) Conveyance dated 19th January 1973 as varied by Deed dated 22 June 2010
   The Bradford Property Trust Ltd (1) Suffolk Police Authority (2)

   (v) Conveyance dated 13th March 1978
   The Bradford Property Trust Ltd (1) Suffolk County Council (2)

3. The Northern Relief Road introduces uncertainty as one of the route options entails a redesigned junction within 150 m of the site access
4. Building the Police Investigation Centre required mitigation in the form of constructing raised banks for lost protected species habitat. The Approval of Reserved Matters (CO9/0504) notes the presence of protected species on site, landscaping conditions, and CO8/0834/OUT (23 October 2008) requires certain trees and hedging to be retained.
Appendix 2

Martlesham Parish Council – Written Submission relating to the MiQs Matter 2

Question 3.29

'Deliverable' and 'Developable'
Potential sale of Police HQ site

The Police and Crime Commissioner (PCC) for Suffolk is considering the potential sale of the Martlesham Police Headquarters site for residential development, in order to help reduce costs within the force and provide better value for money to tax payers without impacting on police services or jobs.

In order to understand the value of the site, and therefore determine whether it should be sold, the PCC has appointed a team of specialist consultants to look at how it might potentially accommodate residential development. Subject to further technical work and public consultation, it is likely an outline planning application will be submitted to Suffolk Coastal District Council later this year.

If the proposal goes ahead, the development of this brown field site could not only save the police force money, it could also help Suffolk to meet its housing needs by providing a range of homes in a short time frame (up to 5 years). It is thought that around 250 homes, would fit on this site.

Update October 2018 – considering your feedback

In the summer, we held a period of public consultation which included a public exhibition at Martlesham Heath Pavilion in June. Draft illustrative plans were on display (these can be viewed here PDF,2MB) and members of the project team were available to discuss the outline proposals and answer questions. Around 310 people attended the exhibition and feedback was received from 164 people or organisations before, during and after the event.

The information below, plus this leaflet (PDF, 197KB), provides details on the main themes of the feedback we received from local residents, staff and other stakeholders and how we are now considering them as the plans are developed further.

Key themes of the feedback

Traffic, access & roads

We understand this is a key concern and we have conducted a full Traffic Assessment that will be submitted with our planning application. Currently, approximately 1,600 vehicle trips are made to or from the Police HQ and Police Investigation Centre (PIC) between 7am and 10pm. A development of 250 homes, plus the retention of the PIC, is estimated to generate between 1,500 and 1,800 vehicle trips between 7am and 10pm. Looking just at peak hours however, the assessment found that there would be fewer vehicles entering/leaving the site during these hours if it were to be redeveloped for housing.

In terms of getting onto the site, it would be accessed as it currently is, off Portal Avenue. As part of our planning application, we will be required to show that the access into and out of the site is safe and that the development does not have any adverse impacts on adjoining roads or junctions. Suffolk County Council Highways will be consulted on this to ensure their design and safety standards are met and we would expect Highways to acknowledge that they may need to consider improvements to local infrastructure.

Capacity of local infrastructure

Your feedback highlighted the importance of ensuring schools and healthcare facilities can meet local needs. To reflect this, the County Council as the local authority responsible for health and education will be formally consulted and they will advise on any additional capacity requirements likely to be needed and how these can be met. Should the development go ahead, SCDC would collect a Community Infrastructure Levy (CIL) financial contribution from the developers for local public services such as transport, flood defences, health and social care, education, libraries and leisure facilities. Also, other approved development in the area, such as that at Adastral Park, will be providing new community facilities.

Level of development in the local area

...
A range of technical reports are being drawn up to consider any potential impacts of the proposal alongside other ‘committed development’ in the area, including the future development at Adastral Park. SCDC will then decide as to whether housing on the site would be acceptable in light of potential net cumulative impacts.

A number of you asked ‘why here?’ in your feedback. Martlesham Heath lies within the ‘Eastern Ipswich Plan Area’ (EIPA), which is defined as a Major Centre in Suffolk Coastal District Council’s Settlement Hierarchy. The Core Strategy identified that approximately 29% of the district’s housing requirement (c.2,300 by 2027) will be in the EIPA. It is considered that Major Centres provide the greatest opportunity to deliver sustainable development, due to the range of (and accessibility to) local services and facilities including retail, employment, education, recreation and leisure, community and public transport.

Should the site be sold, we have been advised that the most suitable, compatible and viable use for the site would be for housing, as it is next to existing residential areas, it would not detract from the strategic employment and retail parks nearby, and because a residential use would also generate the most value (which could then be re-invested into local policing). It would ultimately be a decision for Suffolk Coastal District Council as to whether housing on the site would be acceptable.

Local wildlife

We agree wholeheartedly that local wildlife must be considered during the planning process. Various surveys and reports have been carried out to look at which species are present on or near the site and what could be done, if necessary, to ensure that suitable alternative habitat could be provided on the site should it be redeveloped (or if not, that species could be safely translocated to habitat away from the site).

The site is well screened by hedgerows and trees, which would be retained wherever possible or replaced according to planning consent conditions. Additional planting would also take place. The Portal Woodlands will not be affected by the proposal as they are are they are covered by an ‘area to be protected from development’ policy.

Project economics

Some of you asked about the economic viability of the project. Our aim is to maximise the value of the site in order to enable the PCC to consider the viability of the options available for the force to relocate to fit-for-purpose premises, and to reinvest into local police services. In order to decide if relocation is economically viable we need to obtain a realistic value of the site, which can only be done through the planning process. Even if planning permission is granted there is no guarantee the Constabulary would relocate – ultimately it is dependent on the business case, which will include what offers the best value for the taxpayer and the organisation.

Moving to new or shared facilities should reduce the current running costs of the Martlesham Police HQ. However, more detailed work needs to be undertaken to fully quantify and review all the options before any decision is made. In the interest of transparency, any figures in this regard will be made public when they are known.

Considering our neighbours

Protecting the amenity of those living adjacent to the site is very important to us. The site is already well screened by hedgerows and trees, which would be retained wherever possible or replaced according to planning consent conditions. The new homes would be distanced from the boundaries of existing properties along the southern boundary of the site by a substantial green buffer, good-sized gardens and appropriate boundary treatments, such as quality fencing and landscaping, and positioned to avoid any over-looking. The houses on Portal Avenue are already separated from the site by front gardens, the road and existing trees.

Ideas for the site

Several of you made suggestions for other uses for the site or said we should refurbish or rent out the current buildings. We have considered other employment uses, however with the nearby industrial, business and retail parks (and current vacancies within these), we do not believe there to be further demand for this in the area at the moment. We do not feel that the facilities we could offer to rent would provide enough of an income to cover the money needed for a basic refurbishment or to meet the current running costs. We must also consider what type of use would generate the most value for tax payers – as stated earlier we believe that housing would be the most suitable use for the site.

Police services and jobs

If the site is sold and we relocate to other premises, any further money resulting from the sale of the site would be reinvested in police services to help keep Suffolk one of the safest counties in the country in which to live, work, travel and invest. Furthermore, we do not intend to have any impact on current jobs by selling the site or relocating to other premises.

We are continuing to finalise the plans – with the feedback received in mind – and we anticipate that an outline planning application will be submitted to SCDC later this year. All the feedback we receive will be detailed in a Statement of Community Consultation, which will be submitted with the planning application to SCDC.

Read more

Click here (PDF, 76KB) to read additional information on some of the above topics.

Approximate timeline

1. Further technical work based on East Suffolk District Council planners pre-application feedback received May 2019 (June-October 2019)

2. Review feedback from community and stakeholders, and re-engage as necessary, along with local plan requirements which is due for determination autumn 2019.

3. Submit outline planning application to establish the principle of building houses on the site (November 2019)
4. East Suffolk District Council to determine application (Approx spring 2020).

5. If approved, after a full financial evaluation, the PCC would decide if it were viable to market the site for development and sell the site to a house builder/developer (Approx late summer 2019).

6. House builder/developer would draw up detailed plans to be determined by East Suffolk District Council before any building could start.

We would like to thank everyone who has taken the time to get involved in the project so far.
Martlesham Parish Council – Written Submission relating to MIQs Matter 3
Question 3.30
Is the loss of floorspace justified in the context of the overall supply of employment land?

It is recognised that SCLP 4.4, which we referred to in Rep ID 686, specifically mentions employment premises.

Whilst the Police HQ building itself may not be suitable as employment premises as envisaged in SCLP 4.4 (for design and structural reasons i.e. asbestos), we feel that the Police HQ site as an area of employment is subject to the following Final Draft Local Plan Para 12.174 (Page 238).

“Employment opportunities in this part of the District are focused on Ipswich and other large scale areas of economic activity such as Martlesham Heath and Ransomes Europark to the south east of Ipswich. These areas of employment are to be retained over the plan period and where possible enhanced to ensure economic benefits are realised.”

Also, a change of use to housing will conflict with SCLP 4.1 paragraph 3.
(pg. 62 Final Draft Local Plan)

Alternative uses for the site (including mixed use) do not appear to have been considered. For example, some Use Class B1 and A2 (e.g. in the form of serviced offices which could provide new business startup opportunities) and could be located in such way as to act as a physical boundary between the Police Investigation Centre and a residential part of the site.

Any proposals affecting employment sites should be in accordance with the vision of MNP as expressed in vision statement 3.2 paragraph 2 (pg. 15 MNP) which states:

“provide a modern infrastructure and diverse, adaptable accommodation to encourage the retention, creation and success of businesses of all sizes including high tech and skilled jobs, with low rental starter units available to encourage local people to start businesses here”
Martlesham Parish Council - Written submissions relating to MIQs Matter 3

Question 3.31

Is the policy consistent with national policy in respect of open space and recreation as set out in paragraphs 96 – 97 of the Framework and is it justified?

Policy 12.25 should be removed as unsound and future use of the land should be remitted to the next review of the MNP.

It is important for facilities to be provided on site because experience has shown that land is not available elsewhere in the Parish or neighbouring Parishes for recreation facilities.

Up to date assessments of the need for open space, sport and leisure facilities must underpin any strategy. The Council’s Leisure Strategy is dated 2014.

We question whether the Final Draft Local Plan takes account of the recent research behind:
- The emerging Green Access strategy on which the County Council is currently consulting
- The more recent play space assessments undertaken by Ploszajski Lynch Ltd, and
- The emerging Kesgrave Neighbourhood Plan’s identification of need within Kesgrave and the surrounding area (which includes Martlesham).

Without current data, and taking into consideration the restrictive covenants regarding the retention of land on the Police site as playing fields and the perimeter path being part of the waymarked, nationally recognised Sandlings Walk, we question whether the Police site can accommodate 300 dwellings.

The Police site is contiguous with land for which Martlesham Heath Householders Ltd (MHHL) is responsible. Local householders are required by deed of covenant to become shareholders in a maintenance company and MHHL residents pay for the husbandry of the open space. This fosters a spirit of accountability and community cohesion which has worked successfully for 40 years, being both cost effective and sustainable. This local requirement should be considered.
Martlesham Parish Council – Written Submission relating to Matter 3
Question 3.32
Would the Policy be effective in conserving the significance of designated Heritage Assets?

SCLP12.25 must provide a mechanism for:

- Ascertaining what constitutes the site being undevelopable from a heritage perspective
- In-situ preservation as necessary
- Full compliance with NPPF para 197

The policy should address not only those assets within the plan site but also those in the adjacent woodland and open spaces close to the site which will be under increased pressure due to increased footfall as a result of the housing development. These include revetments and underground features e.g. World War Two fuel tanks and vents, and an underground shelter.

We would like to see best practice as outlined in Policy MAR 12 Non- Designated Heritage Assets, which provides:

"Development proposals affecting non-designated heritage assets either directly or indirectly should respect the significance of and context of the asset and demonstrate how they will contribute to the conservation and enhancement of the heritage asset.”

and Appendix 2 of the MNP for non-designated Heritage Assets

1 Paragraph NPPF Paragraph 197

"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."