

Planning Application DC/20/0902/OUT - Suffolk Constabulary Force Headquarters Portal Avenue Martlesham Heath - Outline Application (Some Matters Reserved) - Demolition and removal of all necessary existing buildings and structures to enable the residential development for up to 300no. new dwellings, with access from Portal Avenue, associated open space and landscaping, drainage and infrastructure

OBJECTION ON BEHALF OF MARTLESHAM PARISH COUNCIL

1. As a statutory consultee, we have been invited to comment upon the application, and write to set out our response. For the avoidance of doubt, we have withheld comment upon the detail of the site given the “indicative only” nature of the application.
2. Our primary position is to strenuously object to the application and we urge the District Council to refuse planning permission.
3. Whilst we recognise that it is perfectly legal to apply for outline planning permission, this development is so strategic and of such importance to the Parish that it is entirely inappropriate for the District Council to allow blanket approval for 300 dwellings with all matters reserved except for access.
4. With so much deferred to Reserved Matters, with so many unresolved key dependencies about the deliverability of the 300 dwellings and with the housing mix and tenure being for illustrative purposes only, the planning application lacks the requisite certainty, clarity and substance to make an informed decision.
5. The subsequent paragraphs detail our grounds for objection to this application: -
 - The timing of this application
 - Failure to engage effectively with the local community at the appropriate stages of the Suffolk Local Plan review and with our Neighbourhood Plan process
 - The complete flexibility being sought in the outline application which would in effect render detailed comments meaningless
 - Incorrect and missing data
 - A housing mix quite out of keeping with the woodland site setting
 - Access arrangements
6. We are pleased to see the District Council have taken on our concerns (please see further ‘Officer email to Agent’ dated 14th April 2020 re EIA Screening options and other matters) and until these concerns can be satisfactorily addressed with supporting documentation, this application is premature.

Currently policy SCLP12.25 in the emerging Local Plan cannot be relied upon as a basis for granting planning permission.

“Policy SCLP12.25 ‘Suffolk Police HQ, Portal Avenue, Martlesham’ in the emerging Local Plan allocates this site for development of approximately 300 dwellings. A relatively large number of representations were submitted in relation to Policy SCLP12.25 during the Publication of the 2019 Final Draft Local Plan covering a wide range of issues and therefore the weight that can be attached to emerging Policy SCLP12.25 at this point in time is more limited.”¹

¹ East Suffolk Council (ESC) Planning Policy response dated 24 March 2020

MARTLESHAM PARISH COUNCIL

Timing of the outline planning permission application: -

7. This application has been submitted at a time of unprecedented national emergency whilst public and local authority resources are being diverted to the Coronavirus response - this is neither essential nor urgent business.
8. This application should not be progressed when the future options for the site are still being evaluated. Alternative strategic evaluations are incomplete: Suffolk County Council recently invited tenders for consultancy to evaluate a range of options for the site (please see Appendix A).² Furthermore, haste is unnecessary as in a Statement of Common Ground signed by the Head of Planning and Coastal Management at East Suffolk Council (ESC) and the Chief Executive Officer of the Police and Crime Commissioner, given to the Planning Inspectorate, it states “.....It is agreed that the site is developable. It is agreed that the site could potentially deliver housing from 2024/25.”³ The site therefore is not currently deliverable.
9. This application has been submitted in advance of the publication of the Planning Inspector's findings on the soundness of the emerging Suffolk Local Plan.
10. It has been submitted in advance of any public consultation on any modifications⁴ to the emerging Local Plan proposed by the Planning Inspector.
11. The Applicant's Planning Statement presumes Local Plan policies ahead of the completion of due legal process.
12. There remain unresolved key dependencies including those listed at page 395 of the Strategic Housing and Environment Land Availability Assessment December 2018, those listed in the 'Officer email to Agent re EIA' dated 14th April 2020, those listed in the East Suffolk Council pre-application advice of 16th April 2019⁵ and the outcomes of the Martlesham Heath Householders Ltd negotiations⁶ which prevent making a decision.

Ineffective Community Engagement and missed opportunities

13. The best way of getting an exemplary development is through community engagement, not only with Martlesham Parish Council & local parishioners but also with East Suffolk Council councillors who have been and will continue to be bypassed by the current application and time scales.
14. The Applicant has produced a Statement of Community Engagement, but the plans presented for consultation were for a completely different site layout with 250 dwellings. The number of 300 dwellings was introduced by East Suffolk Council in its pre-application advice of 16th April 2019⁷ which provides:

“The level of development proposed, at 250 dwellings is below the approximate level of 300 within the [Final Draft Suffolk Local Plan] policy and

² The formal ITT available is at <https://www.contractsfinder.service.gov.uk/Notice/9468c8b4->

³

<https://suffolkcoastallocalplan.inconsult.uk/consult.ti/SuffolkCoastalExamination2019/viewContent?contentid=410835>

⁴ J27 Matter 4 Note on SCLP 12.25 8 November 2019 Local Plan Evidence base

⁵ Reproduced in Transport Assessment Part 2 Appendix A

⁶ Planning Statement paragraph 1.15

⁷ Reproduced in the Transport Assessment Part 2 Appendix A

MARTLESHAM PARISH COUNCIL

[ESC] would therefore suggest that the numbers on site should be increased to reflect the policy wording. The exact number of units would be predicated on the mix of housing on the site”

15. The application has been submitted before Local Authorities, in particular Parish Councils, can reasonably be expected to establish the necessary infrastructure to host electronic remote meetings at which the public and councillors can participate and debate the issues raised.
16. The Applicant failed to identify this site as a potential development site in response to the 2018 Martlesham Neighbourhood Plan⁸ consultations and its associated local policies, despite having concept plans in place in 2016. Please see Appendix B.
17. If East Suffolk Council approves the outline planning application at this time, it will breach its own Statement of Community Involvement⁹, will fail in its own decision making principles¹⁰, and will fail to correctly interpret and apply the made Martlesham Neighbourhood Plan.

Outline application and scope of flexibility sought by the Applicant

18. The applicant emphasises in at least two documents, in particular at page 8 of the Planning Statement at paragraphs 3.06 -3.09 and in Table 3.2, the need for complete flexibility in the outline application. This means critical aspects will be addressed post decision. These will include land use, landscaping, dwelling mix, tenancy types, density and building heights etc. There is no certainty of what is expected to be provided by the ultimate developer. Para 3.06 of the Applicant’s Planning Statement provides:

“It is anticipated that the S106 Agreement will include mechanisms to ensure the delivery of affordable housing, housing mix, open space and other planning obligations for the Proposed Development.”

19. The content of the Planning Statement is entirely illustrative and therefore not binding upon the Applicant, nor the developers who will ultimately purchase the site and present their own plans for development.

Incorrect and Missing Data

20. The ‘Officer email to Agent’ dated 14th April 2020 notes ¹¹ there was no formal pre-application submission to the Local Planning Authority. There is an anomaly here as the Applicant refers to pre-application advice and the Transport Assessment Part 2 starts with a pre-application advice document entitled “Officer Advice” dated 16 April 2019 from ESC to Carter Jonas.

⁸ Made July 2018

⁹ Adopted Sept 2014 - Page 7

¹⁰ As set out in Article 13 of its constitution

¹¹ Page 4 under conclusion “I note there was no formal pre-application submission to the Local Planning Authority”

MARTLESHAM PARISH COUNCIL

21. The housing mix data relied upon in the Applicant's Planning Statement is incorrect in places and out of date. For example, the national standard for assessing housing need is now to adopt the 2014 Housing Need projections and not the 2016 Housing Need projections as relied upon in the Planning Statement. Paragraph 4.27 relies upon 2006 data. There is no footpath to Eagle Way. It is not a reliable document.
22. The Applicant's Planning Statement makes little or no reference to the extensive Ipswich Housing Market data analysis submitted within the Final Draft Evidence Base to the Suffolk Local Plan Examination Hearing 2019.
23. Policy DM10 information on marketing is missing. The District Council in its conclusion (page 4) to the 'Officer email to Agent' dated 14th April 2020 (EIA Screening options and other matters) also notes:

"The [Planning] Statement would also need to demonstrate how the site has been marketed etc. in accordance, and identify any interests shown, in accordance with the requirements of the existing Local Plan Policy DM10."
24. In his letter of 31st January 2020, the Planning Inspector when commenting on Policy SCLP12.25 made reference to the retention of the Police Investigation Centre (PIC). Paragraph 91 of the National Planning Policy Framework (NPPF) was raised; any development of the site should ensure, with regard to the PIC, that the fear of crime does not undermine the quality of life for future and existing residents in the wider area. There is no evidence of how this will be achieved.
25. Suffolk County Council in their letter of 5 March 2020 to East Suffolk Council, furnished a schedule of Infrastructure requirements to be funded by the Community Infrastructure Levy and S106 funding amounting to circa £3.39m (excluding highways work) and added that there had been no pre-application engagement with the County Council even though the NPPF paras 39-45 strongly encourages such engagement.
26. Para 11 of the Statement of Common Ground between ESC and the PCC (undated) says "*viability may be more challenging for flatted developments*". Other than an out of context reference to flats in the Martlesham Neighbourhood Plan, there is no evidential justification for the proposed flat intensive scheme currently being proposed.

Planning Policy and Housing mix in the Martlesham Neighbourhood Plan

27. We repeat our objections to the site being used for housing - previously submitted to the 2019 Planning Inspectorate Examination of the Final Draft Suffolk Local Plan. Martlesham Parish Council objected to this proposal in strong terms to the Planning Inspector. Please see Appendix C. The District Council can demonstrate well in excess of a five-year housing land supply. This attempt to impose housing in an inappropriate location should be resisted.
28. We object to the unjustified and non-compliant¹² loss of employment which would result from the change of use to housing, and the failure to consider alternative employment options on site.

¹² Please see paragraph 23

MARTLESHAM PARISH COUNCIL

29. The release of the restrictive covenant needs to be investigated to facilitate alternative strategic options and to determine if these are preferable to the proposed change of land use from employment to housing.
30. It is entirely misleading to suggest the proposed 300 dwellings accord with the Martlesham Neighbourhood Plan housing policies¹³ (MAR 4 and 5). With respect, this is a fundamental misunderstanding of the Martlesham Neighbourhood Plan (MNP) in general and the MAR policies in particular. The MNP was written in light of the District Council strategy to locate housing at Brightwell Lakes¹⁴. Thus, MNP provides¹⁵:

“It is particularly important that [Martlesham] Neighbourhood Plan policies addressing housing are set within the context of parts of the Neighbourhood Plan area being classified as a ‘Major Centre’ and a ‘Key Service Centre’, as defined in the Suffolk Coastal Core Strategy. The Core Strategy specifically allocates the land at Adastral Park for a mixed use development including housing (Core Strategy Policy SP20). This will deliver a significant level of residential development immediately adjacent to the Neighbourhood Plan area. The implications of this growth are shown in Table 5.1”

Table 5.1 at page 25 of the MNP identifies as a relevant consideration for Martlesham as a Major Centre

“From Section 4.14 of Suffolk Coastal District Local Plan: Through the plan period however a single allocation of 2,000 new homes is identified east of the A12 at Martlesham to the south and east of Adastral Park”

and as an implication for the Martlesham Neighbourhood Plan

“No further land required to be allocated for housing” and “Limited infill can be the principle form of development”.

As a consideration for Martlesham Village as a Key Centre, Table 5.1 states:

“No new housing allocation is identified for Martlesham in the Core Strategy and table supporting policy SSP1 of the Site Allocations and Area Specific Policies Document (January 2017 “

and as an implication for the Martlesham Neighbourhood Plan, states:

“The focus of housing growth should be infill development within the settlement boundary, which is encouraged by the Neighbourhood Plan policies”.

31. The purpose of including flatted development in the Neighbourhood Plan is to increase the range of housing types and mix for the above-mentioned infill housing. The inclusion of 170 flats in this planning application serves only to decrease the housing mix and greatly exceeds the “infill” envisaged in the Neighbourhood Plan.

¹³ Transport Assessment Part 2 Appendix A

¹⁴ Paragraph 5.5 Martlesham Neighbourhood Plan Page 2

¹⁵ Paragraph 5.1 Martlesham Neighbourhood Plan Page 25

MARTLESHAM PARISH COUNCIL

32. The pre-planning advice¹⁶ takes the Martlesham Neighbourhood Plan out of context. The MNP at policy MAR5 states the overall housing mix for future development should broadly align with policy statement SP3 of the 2013 Local Plan.

Highways and Access

33. The Applicant has failed to address our concerns and those of Suffolk County Council Highways Authority. We object to the Applicant's applying town centre TRICS data to this suburban woodland setting, forming conclusions based on questionable data and indicative plans, and to the Applicant's conclusion that the proposed development will lead to an overall reduction in number of journeys than is presently the case.¹⁷

34. Paragraph 109, of the National Planning Policy Framework states that:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

There are a range of concerns which need addressing; road safety, the cumulative effects of the impact on the local road network, and air quality. The projected traffic increase at the Portal Avenue, Deben Avenue and Park and Ride junctions is a safety concern to school children and other cyclists using the cycleway crossing these junctions; the safety risk is also increased for drivers and passengers entering and exiting the A12 roundabout and at Main Road on both sides of the roundabout. There will be increased risks in crossing the A1214 from the Park and Ride bus station and accessing the bus stops located on the northern side of the main road, especially at peak times, due to the increase in traffic and in the number of pedestrians (from 300 new dwellings). The increase in traffic and pedestrians will impact on use of the pedestrian crossing on Main Road and has the potential to greatly exacerbate the 2017 accident rates identified in the Transport Assessment.

35. The Suffolk Guidance for Parking document, adopted in the MNP¹⁸ and updated in May 2019, provides expected standards regarding car and cycle parking standards for developments. It is uncertain whether these standards can be met with the inevitable provision of communal parking for flatted developments and with illustrative only parking spaces being identified on the Applicants site plan.¹⁹
36. The existing perimeter footpaths on site are well used to connect with the local woodland and heathland, to the long-distance footpath network including the Sandlings Walk, and for sustainable pedestrian access to nearby facilities. These existing footpaths should be preserved.
37. One of the key uncertainties preventing the application from proceeding, is whether the additional pedestrian access going SE onto Eagle Way through woodland on

¹⁶ Reproduced in the Transport Assessment Part 2 Appendix A

¹⁷ Paragraphs 6.17 and 12.11 of the Applicants Transport Assessment

¹⁸ Page 27 Martlesham Neighbourhood Plan

¹⁹ Suffolk County Council's parking policy at a paragraph 4.3.1 states that resident's parking spaces should be located on the boundary of the rear garden. In this way, the residents are more likely to use the parking court rather than parking in inappropriate locations (e.g. on verges and pavements). This principle is not reflected in the illustrative site plan.

page 23 of the Design and Access Statement, but which currently does not exist, is capable of delivery without the consent of Martlesham Heath Householders Ltd.²⁰

38. We are pleased to see the District Council acknowledge that if this application proceeds, the increased public access and impact on the surrounding area will provide a greater strain on clinical commissioning, education provision, on the non-designated heritage assets identified in the Neighbourhood Plan, the SSSI, Portal Woodlands, the new Community Orchard and the Local Nature Reserve (Martlesham Common) all within a five-minute walk of the site.

IN CONCLUSION:

Martlesham Parish Council objects to this planning application in the strongest terms. This attempt to impose a change of use with blanket approval for an unspecified but extremely problematic project without community and District Councillor engagement, should be refused. Made Neighbourhood Plans should be the starting point in making planning decisions, not premature policies which have been challenged, have not completed due legal process and which have not yet become planning law.

APPENDIX A

Extract from Architects' Journal Online, 24 March 2020, by Merlin Fulcher

Competition: Martlesham Police Headquarters

Suffolk County Council is seeking a consultant to consolidate or possibly relocate a 10ha police headquarters in Martlesham near Ipswich.

The team selected for the estimated £50,000 contract will complete a strategic outline case and options appraisal for the ageing 1970s complex which hosts around 900 employees working for the Police and Crime Commissioner (PCC) for Suffolk.

The study will explore a range of options for the suburban site including a full relocation of services to other locations in the area, partial retrofit and full refurbishment. It is thought the plot, a short distance from the former BT Research Laboratories at Adastral Park, could be used to build up to 300 homes.

In its brief, the council says: 'The PCC for Suffolk is looking for ways to save money and protect front-line services and jobs. The PCC recently commissioned a development appraisal of the 10ha Martlesham Police Headquarters (PHQ) site to understand its value and development potential. The project will review the spectrum of options available to the police and other public services for remaining or relocating from the current PHQ site.

'These include the "relocation of all service" to the "do nothing" approach and all options in between (including refurbishment of all or part of the site; segmented relocation; and whole service relocation). This will form part of the options appraisal to understand appropriate services within the OPE partnership where collocation and service integration is possible; this will then inform the development of the outline business case.'

²⁰ Paragraph 4.11 Transport Assessment

MARTLESHAM PARISH COUNCIL

Martlesham is a small village on the eastern fringes of Ipswich, the county town of Suffolk. It was expanded in the 1970s with the creation of the enormous BT Research Laboratories and the Martlesham Police Headquarters and now features several large out-of-town stores.

The headquarters site has been earmarked for potential new housing since 2015 and it is understood the complex has a £4 million maintenance backlog, according to the Ipswich Star. The team selected for the latest contract will look at a range of options to relocate services in other nearby locations with the findings being used to create an outline business case for redevelopment.

Applicants must hold public liability insurance of £5 million, employer's liability insurance of £5 million and professional indemnity cover of £2 million. Bids will be evaluated 80 per cent on quality and 20 per cent on cost.

The deadline for applications is 21 April

Contact details -

Martin Jennings Suffolk County Council IP1 2BX Tel: +44 1473260450
martin.jennings@suffolk.gov.uk

APPENDIX B

MISSED OPPORTUNITIES FOR COMMUNITY ENGAGEMENT

During the preparation of the Martlesham Neighbourhood Plan (MNP) some of the planning team met the Police and Crime Commissioner (PCC) in December 2015. They were informed options for the future of the site were continually under review, but no plans were on the table. Both parties agreed to organise further meetings as and when required.

We now know from the application Design and Access statement dated 27 February 2020, that an initial concept plan was available as early as November 2016. Work on producing that concept plan would have occurred for a period before that date - i.e. before the MNP Regulation 14 consultation was carried out between 14 November 2016 and 31 January 2017. The PCC did not respond to the consultation.

This was a missed opportunity to incorporate the site into the MNP's policies – and now the Applicant is arguing that it is not within the scope the MNP's policies and that therefore the MNP places no constraints on the development of the site.

In the event the PCC made public his intention to apply for planning permission for housing on 12 June 2018 - i.e. only weeks before the MNP was made.

With regards to Local Plan review, the first draft Local Plan consultation took place from 20 July to 14 September 2018. The first draft did not contain the Police HQ site (even though, it now transpires, work on the options for the site had already been going on for about 2 years). As a result, there wasn't an opportunity for the Parish Council to comment on its inclusion in the Local Plan at its first draft stage. In the event the site was formally submitted by the Applicant late during the first draft consultation stage, with the Parish Council being

MARTLESHAM PARISH COUNCIL

advised of its inclusion in the final draft at a meeting with a senior planning officer on 14 November 2018, only months after the making of the Neighbourhood Plan and too late to do anything but raise objections through the Examination as to soundness (not the same as community engagement).

We were told that there was no opportunity to comment on its inclusion in the Final Draft Local Plan as it was going to the Scrutiny Committee the following week, and that our consultation would arise at the Inspection Stage. A finding of 'soundness' is limited and does not mean the plan is good or desirable.

We have found no reference to the site in the notes of the Local Plan Working Group and a Freedom of Information response revealed no discernible audit trail as to how the site came to be included.

APPENDIX C

MARTLESHAM PARISH COUNCIL SUBMISSION TO THE PLANNING INSPECTORATE

Final Draft Suffolk Local Plan

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 SCLP4.4, 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 SCLP4.4 (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 start-up 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.

MARTLESHAM PARISH COUNCIL

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”

Susan Robertson
Clerk to Martlesham Parish Council
24 April 2020