

18<sup>th</sup> May 2010

Mr P Ridley  
Head of Planning Services  
Suffolk Coastal District Council  
Melton Road  
Woodbridge  
Suffolk IP12 1AU

For the attention of Paul Coffey

Dear Mr Ridley

**Planning Application C09/0555 - Refurbishment of Adastral Park & development of adjoining land to provide: up to 60,000 m2 additional employment floorspace (B1); erection of up to 2000 dwellings; mixed-use local centre; education provision; hotel; energy centre; public park and other areas of public open space; other community infrastructure; changes to junctions on A12; new road connections to C356 (Newbourne Road/Heath Road/Waldringfield Road); other ancillary works. (Outline Application)**

1. The Suffolk Preservation Society (the Society) is grateful for your letter dated 27<sup>th</sup> April advising us of the Council's decision to adopt the LDF Core Strategy and Development Management Policies as interim planning policy for development control purposes. We appreciate the Council's desire to provide certainty in the light of paragraphs 70-72 of PPS3. However, given the very healthy housing land supply figures (6.9 years – 5 years and 25.8 – 15 years) as at December 2009, the Council is not vulnerable to appeal on this ground.

2. This development is a strategic site of countywide significance. In our opinion to short circuit the LDF process by progressing this key strategic site in advance of the submission draft and subsequent EIP would serve to discredit the whole LDF process. Paragraph 2.2. of PPS12 states that one of the advantages of spatial planning is that it “ensures that strategies can be based on community's views and obtain community buy-in”. The UK Government has signed up to the UNECE Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental matters (the Aarhus convention). Article 7 states:

“Each party shall make appropriate practical and/or other provisions for the public to participate during the preparation of plans ...”

3. This is reflected in the adopted SCDC Statement of Community Involvement (SCI) states:

“By achieving greater levels of community engagement in the planning process, local communities, stakeholders and other organisations can contribute more to the shaping of their local environment and addressing key local challenges, for example; affordable housing and access to services. By working in this way, it is considered that there will be an enhanced level of local ownership and understanding in planning and thus a more flexible, inclusive and streamlined process.”

4. The informal adoption of the Core Strategy and allied Development Management Policies is effectively contrary to the LDS adopted timetable, which as the SCI states is the starting point for the LDF, setting out the timetable for the production and progression of LDD's through to adoption. By short circuiting the prescribed process, through the positive determination of the Adastral Park/Martlesham Heath site, all public confidence in the egalitarian nature of the LDF process will be shattered thereby depriving the process of legitimacy. The SCI is statutory (Town & Country Planning (Local development) (England) Regulations 2004) and cannot be set aside lightly.

5. The Council is part of the Suffolk Compact, a contract between the voluntary sector and public sector agencies. The Compact makes an undertaking to the voluntary sector which it acknowledges provides advocacy for those with no voice:

“To recognise and support the independence of the voluntary and community sector, including its right within the law, to campaign, to comment on the policies of public sector agencies, & to challenge those policies, irrespective of any funding relationship that might exist, & to determine & manage its own affairs.”

6. We believe that to progress this strategic development in advance of the LDF statutory process is to deny third parties their right to make representations and to have them considered by an independent inspector. In our opinion this approach runs counter to the SCDC SCI and is fundamentally opposed to the UNECE Convention on Access to Information to Information, Public Participation in Decision Making and Access to Justice in Environmental matters (the rhus convention).

7. The new Government has publicly stated its intention to fundamentally review the current spatial planning system in the light of localism. We believe this may considerably change the housing strategy that is currently derived from the RSS. This may have serious implications for the emerging Core Strategy and the subsequent determination of these proposals. The determination of this application would serve to prejudice the LDF process and would in all probability result in the application being called-in for determination by the Secretary of State. In our opinion this would represent the profligate use of scarce public resources which would be more appropriately channelled through the LDF process.

8. Given the above, the Society reiterates its previous suggestion:

a. The application is withdrawn, or at least held in abeyance at this stage to allow the future of the area to be determined through the EIP by an independent inspector when considering the soundness of the LDF Core Strategy as a whole;

or

b. The application is refused as premature until adoption of the final version of the LDF Core Strategy by the council has taken place.

9. In the event, that for whatever reason, the LPA decides not to follow the suggested courses of action in 8 a. or b. above, and to proceed with the processing of the application with a view to its approval, then the Society would be pleased to submit comments aimed at ensuring any proposal and development addresses major issues and concerns and is of the highest possible environmental, design and sustainable standards.

10. The Society asks to be kept informed on the processing of the application and specifically to be consulted on the details once the principle of development has been considered preferably via the LDF process. It would ask to be consulted on all amendments. It also asks to be informed of the eventual decision on the application.

Yours sincerely



**Simon Cairns** DipTP Dip Bldg Cons (RICS) MRTPI IHBC  
Director

Cc Go East  
Cc MP's  
Cc SPS Executive  
Cc SPS Suffolk Coastal District Committee  
Cc PTC Committee  
Cc Ipswich Borough Council  
Cc John Pitchford, Strategic Planning and Sub-Regional Partnerships Manager - Suffolk County Council  
Cc Waldringfield Parish Council  
Cc Anne Maddison - Waldringfield Wildlife Group  
Cc Waldringfield Sailing Club  
Cc Hemley Parish Council  
Cc Martlesham Parish Council  
Cc Woodbridge Town Council  
Cc Ipswich Society