

WALDRINGFIELD PARISH COUNCIL

Clerk to the Council: Mrs Jean Potter, 64 Chilton Road, Ipswich, Suffolk IP3 8NZ
Tel 01473 723409 Email pc@waldringfield.suffolk.gov.uk

Detailed Comments on Planning Application C09/0555 (Revised Redevelopment of Adastral Park) by Waldringfield Parish Council

Planning Statement

Page 12

"the LDF production ... will not be completed until 2010 at the earliest. BT cannot wait until 2010 before submitting this application. It must address market demands and its own operational requirements now." Market demands and BT's own operational requirements will not be addressed by building houses. It is understandable that BT would want to progress the modernisation of the facilities at Adastral Park (including the University and hotel) in advance of the completion of the LDF, but there is no reason why this cannot be separated from the proposals for housing developments on the adjoining land. The latter could then wait until the LDF was completed. It would then be clear exactly what housing policies the application was being tested against, instead of making the assumption that the present LDF draft preferred options will actually be agreed. In short, the application is premature.

We strongly disagree with the decision (taken by the LDF Task Group) to locate all the housing allocation for the Ipswich Policy area in one place, and for that place to be the area east of the A12. We believe that this option is only being considered because BT have worked hand in hand with the planners and that this neatly provides them with an easy option to fulfil their housing requirements. This makes a mockery of the principle of plan-led development. No regard has been taken of local opinion.

Page 13

"All concerns and issues that have been identified have been examined, and where appropriate incorporated into the plan". The concerns of the local community (particularly at Waldringfield) have been completely ignored – see comments on the Statement of Community Engagement.

Page 14

"... uncertainty created by Local Government review that may prejudice the LDF programme in particular and decision making in general ..." "BT believes that SCDC are best placed to determine this application" This is pure conjecture. There is no reason to suppose that decision making will be prejudiced, or that whoever determines BT's application post Local Government restructuring will be any more or less qualified/competent than the current planning officers at SCDC (they may even be the same people).

Pages 16 & 17

"... funds need to be protected for R&D and cannot easily be diverted into property renewal" Why not? Is it not possible for BT to decide how its funds are best used? If property renewal is needed to facilitate R&D work, then surely the funds should be secured from the profits BT makes from providing telecoms services (which in turn were made possible by earlier R&D work). BT's 2007/8 budget for building works and land costs was £1,209m (BT Group plc Annual Report & Form 20-F, p111). If it was possible to provide this without selling off land for housing, why is it not possible to do the same for the Adastral Park redevelopment?

BT also says: "We expect that future capital expenditure will be funded from net cash inflows from operating activities, and, if required, by external financing" (BT Group plc Annual Report & Form 20-F, p53). Therefore BT should fund the improvements to Adastral Park from operating activities, as stated in their Annual report, not from a windfall from the sale of land.

Over the years there have been many modernisations to the facilities at Adastral Park, and these were funded out of operating profits, as one would expect. BT have not provided any financial

evidence that the similar modernisations proposed in this application could not also be funded out of operating profits. They simply expect the public to unquestioningly accept their unsupported and implausible assertion that it cannot be done. BT's current financial difficulties are irrelevant – this application was submitted well before the present economic crisis, and the building costs for the modernisation will be spread over many years, up to 2025 in fact.

"This [refurbishment and redevelopment of the buildings at Adastral Park] requires an injection of new capital which could come through land sales for residential development".

"...sale of land for these new homes will fund the redevelopment of Adastral Park"

The money BT will make from the land sale is effectively a windfall, gained at the taxpayer's expense. When BT was privatised, this land would have been valued at agricultural prices (if it was valued at all!) So what the taxpayer received for it was a minute fraction of what BT will receive once it has been re-designated as development land. BT has done nothing to earn this windfall, and it should not be used to pay for improvements to BT's facilities, or as part of the latter's cost justification.

Page 16

"... people have a greater opportunity ... to choose to live very near to work ..." They might have the opportunity but will they take it? The evidence from the current situation clearly indicates they will not. Out of the current workforce of 4,000 only 205 (~5%) live nearby, in postcode IP5 3 (Transport Assessment, §6.7), and only 3% live within 1 mile of Adastral Park (Travel Plan, §5.11). This figure will probably decrease as more of BT's employees take advantage of BT's policy of encouraging home working, enabling them to live in towns such as Ipswich or Felixstowe, or the many attractive rural villages in Suffolk. 53% of Adastral Park employees currently work from home (Travel Plan, §5.43), and BT says "... there is scope for a greater number of staff to work from home on a regular basis ..." (Travel Plan, §5.46).

In fact, it is very likely that most of the residents of the proposed new houses would be employed in the Ipswich area or possibly commute to London, putting more pressure on the transport infrastructure. 24% of the houses will be 'affordable' (Local Development Framework Core Strategy Preferred Options, SP19), and are unlikely to be occupied by the highly qualified managerial and professional people likely to be employed at Adastral Park. The new residents of the affordable houses are more likely to work in the retail and manual sectors, and the main areas of employment for these are in Ipswich Town centre and Ransomes Europark.

Page 17

"This [1050 homes] is a difficult scale of development that does not readily support a range of services and facilities" This is at odds with the LDF Task Group's view (expressed at the meeting on 28th July, 2008) that building 1050 homes in Area 4 would allow for the strategic planning of services. No-one said at that meeting that 1050 homes was too few to support a range of services and facilities.

Page 18

"Primary Schools in surrounding villages such as Waldringfield have falling school rolls." The presence of the proposed new primary school will hasten this, possibly causing the closure of primary schools in Waldringfield and other nearby villages, causing further damage to the quality of life in these villages.

Pages 18 - 20

All the secondary school pupils living in the new housing estate will be in the Kesgrave catchment area. It is acknowledged that Kesgrave High School is full to capacity and there is no room for expansion, so a new school will be needed (where will it go?) No reasonable solution is suggested. "BT do not believe Adastral Park represents the best location for a school" and we agree. The suggestion of a school to the south of Martlesham is just as bad. It would almost certainly involve the destruction of yet more greenfield land, it would add to the traffic problems on the A12, and it would further the urbanisation of Martlesham village.

It would be far better and cheaper to disperse SCDC's housing requirements over several smaller areas, absorbing the demand for school places into existing schools (primary and secondary),

possibly with extensions where needed. Building only as many houses as are actually needed, and dispersing them over several sites would avoid, or at least reduce, the problem.

Pages 26 & 27

PPS7 requires the promotion of the "continued protection of the open countryside for the benefit of all" Far from being in accord with this as BT claims, the building of a 2,000 dwelling estate will destroy 250 acres of open countryside, and is in direct conflict with PPS7.

PPS7 also promotes "discouraging the development of greenfield land". Despite BT's description of the site as "damaged by quarrying" (p27, top bullet) it is still a greenfield site. Are we really to accept that a landowner can damage a greenfield site, then argue that it is no longer greenfield and therefore is suitable for development?

PPS7 also requires patterns of development "preventing urban sprawl". This very large housing estate will extend the urban sprawl that is already happening East of Ipswich. If it is built, there will be continuous housing from Ipswich Town centre to Waldringfield Heath, and only one open field between that and the River Deben. It will completely change the character of what is currently a beautiful part of rural Suffolk, turning it into an extension of suburban Ipswich.

These comments also apply to the Environment Statement, §5.8

Page 27

It is claimed that PPG13 is met by "providing jobs and homes adjacent to one another". However, the people with jobs at Adastral Park are unlikely to be the same people as the residents of the new homes (see comments on Page 16, above).

Page 28

It is unclear whether the Waldringfield pit SSSI will remain in situ (as shown in various maps) or will be abandoned with a new geological face being opened. Natural England lists several operations likely to damage the special interest of Waldringfield Pit SSSI. Amongst these are:

- The changing of water levels and tables and water utilisation
- Construction, removal or destruction of roads, tracks, walls, fences, hardstands, banks, ditches or other earthworks
- Erection of permanent or temporary structures
- Modification of natural or man-made features
- Recreational or other activities

It is difficult to see how this is consistent with retaining the SSSI within a large scale housing estate. Fig. 4.11 in the Design and Access Statement shows the SSSI directly adjoining a residential area containing 4 story high buildings (Fig. 5.6).

No mention is made of the proximity of this development to the Newbourne Springs SSSI, the Martlesham Heath SSSI or the Deben Estuary SSSI, all of which will be profoundly affected by such a large number of houses, people, cars, pets, etc. so close by.

Also, no mention is made of the fact that the Deben Estuary is also a RAMSAR International Wetland Site, and the danger that wildlife (particularly migrating birds) will be adversely impacted.

(These are mentioned in the Environmental Statement, §12.27, but the only impact mentioned is on the Waldringfield Pit SSSI. It says this is considered in Section 13 (Ground and Groundwater Contamination), but no such consideration could be found in §13)

Page 29

"BT has consulted with Natural England ... who have indicated that this development has no significant impact on the SPA". We dispute this conclusion and question the method by which it was obtained. SPAs are strictly protected sites, classified for rare and vulnerable birds, and for regularly occurring migratory species. The notion that the Deben Estuary SPA will not be affected by a housing development of this magnitude, just 1.5km away is, to say the very least, debatable. We know nothing of the conversations between BT and Natural England. Did BT present Natural England with all the facts? Did Natural England consider the counter arguments? Did Natural England take into account the likely increase in boating and dog walking activities on the river and the vulnerable

wildlife habitats in the estuary? These and other concerns should not be dismissed by the bland assurances in this section.

Page 36

"[The Core Strategy Preferred Options was published in December 2008](#)" It should be made clear that this is only a draft, currently undergoing public consultation. It is quite possible that the public will disagree with the document's conclusions, and the public's views should not be ignored.

Pages 37 & 42

"[The housing figures are expressly stated as minimum housing figures for the region, to be exceeded](#)". The East of England Plan does not say the figures are "to be exceeded". It says: "[District allocations should be regarded as minimum targets to be achieved, rather than ceilings which should not be exceeded](#)", which is not the same thing at all.

Page 43

In seeking to justify the proposal for nearly double the number of houses stipulated in the LDF, BT refers to the fact that the figures in the East of England Plan are minima: "[The housing figures contained within the Core Strategy Preferred Options should therefore be considered to be minimum figures](#)."

Although the East of England Plan figures are indeed minima, this only means that SCDC is free to exceed them in the LDF if it wishes. So far it has chosen not to do so. (If the LDF figures could be treated as minima, it would make a farce of the whole enterprise of strategic planning – nobody would know even approximately how many houses will actually be built!) The figures provided in the LDF are not minima, they are the actual numbers that SCDC's strategy requires to be built. There is no justification for treating the LDF figures as minima, to be exceeded by developers if they so wish.

Page 43

"[there is every indication that ... the RSS will revise the minimum housing requirements further upward](#)" This is pure conjecture and is not an argument for exceeding the current minimum target.

Page 43

"[the site is available now](#)" Most of the site will not be available until the quarrying has been exhausted, which will be at least 10 years. The housing requirement could be met far faster if the housing was dispersed over several sites.

Page 44

Most of the items listed could be supplied whatever the size of community, for example, a "[comprehensive and high quality landscape framework](#)". Also, "[development capacity to mitigate off-site landscape impacts](#)" – if the site were smaller there would be less off-site landscape impacts to mitigate.

Page 44

"[... the pressure on existing infrastructure of a lesser development would be significant ...](#)" It is perverse to argue that fewer houses would produce more pressure on the infrastructure. Moreover, the pressure on existing infrastructure of several lesser developments (totalling the same number of houses overall) would also be less, as the problems and impacts would be dispersed.

Page 45

The policy compliance summary completely ignores the obvious fact that the proposed housing development violates Local Plan policies AP8 and AP25.

AP8 says: "[The landscape quality and character of the Countryside will be protected for its own sake by generally restricting development to that which is essential for the efficient operation of agriculture, forestry and horticulture or is otherwise permitted by other policies in the Local Plan](#)". Since the land proposed for housing development is designated as Countryside, the planning application is clearly in violation of AP8.

AP25 says: "... estate-scale development will not be permitted, other than within the defined physical limits of the Towns". Again, the planning application is estate-scale and is not in a town, so it is clearly in violation of AP25.

The Local Plan also says: "The character of the Suffolk Coastal District is largely derived from the dispersed nature of its settlements, the widespread occurrence of hamlets and small groups of buildings, and their open form with gaps between dwellings. This character should be safeguarded. ... development in such areas, particularly housing, will be strongly resisted." The proposed development is adjacent to the hamlet of Waldringfield Heath, and so clearly violates this statement.

"... developments in excess of ... but is wholly acceptable..." This misrepresents the guidance on developments in excess of the figures given in the LDF (see comments on page 43).

"... and could deliver around 2,000 jobs" There is no guarantee that these jobs will be created – given the fact that BT has just shed 10,000 jobs and is currently planning to shed another 15,000 it seems a bit optimistic.

Page 46

"The efficiency and effectiveness of such a scheme [carbon efficient energy generation] is massively increased if there are domestic activities that use the energy in the evenings and at weekends This is best provided by adjacent housing, hotels, etc which are part of a linked supply and distribution system". In principle, we fully support the proposed carbon efficient energy generation scheme. As well as supplying energy to the hotel and the new and renovated buildings within Adastral Park, there is no reason why it couldn't supply energy to adjacent houses, such as those at Martlesham Heath, or possibly retailers and leisure suppliers such as Tesco, Kingpin, etc. None of this is dependent on the proposed housing development.

Page 46

"However, at this stage BT is reluctant to do this [replace grid supply with local renewable supply] if it simply released capacity for other competing land," What other competing land? BT is not competing for land with anyone.

"... particularly with no mechanism for the apportionment of costs" Presumably BT would supply energy to other parties (domestic and commercial) at an agreed market rate. Is this a problem? How is this an argument for the housing development?

Page 47

"... the development [of the proposed new primary school] may initially be able to support existing local schools, safeguarding their future". If the future of existing local primary schools is in danger from falling numbers (this is disputable), it is difficult to see how providing another school will safeguard this. On the contrary, if the new school has spare capacity, its presence could be used as an argument for closing local schools.

The above quote also contradicts the assumption that all primary school vehicle trips will be within the development site (see comments on the Transport Statement, §6.31)

Page 47

"... BT is working ... to address the challenges that development brings to the local transport network" No amount of 'working' on it will alter the fact that this development will generate huge traffic volumes (approximately 2,400 (possibly 3,100) extra vehicle trips per day – see comments on the Transport Statement, §6.46), and that the transport network is already creaking. The A14 is already heavily congested, mainly with lorries going to/from Felixstowe port, and this is likely to get worse. Traffic heading for Essex will go over the Orwell Bridge, which cannot be widened.

Most of the traffic from the new housing estate will get onto the A12 via the road which runs between the Foxhall Rd roundabout and Waldringfield Heath. This is a narrow rural road with 2 sharp bends where there are frequent accidents. It will become much more congested and dangerous as a result of this development.

"... the pressures that are created are relevant to all the options for development in the IPA ..." If SCDC's housing allocation were dispersed over several sites in the IPA, this would reduce the problem by spreading the impact over many roads and road junctions, instead of concentrating it on the A12 and the 2 already congested roundabouts covered by this application. (This obvious fact is ignored in the LDF Preferred Options document).

"... through locating residential development adjacent to the area's largest employer ... the options to reduce this pressure are substantially improved" This is unlikely – see comments on page 16.

Page 48

"Existing and future sand and gravel extraction provides an excellent opportunity to re-contour the land and prepare it for development ...". "... there is no conflict between the allocation of the land for mineral extraction, and its development to meet housing and economic objectives" "... restoring the land for development would be a very efficient and effective process ...". The existing planning permission requires the land to be restored to its original state. SCC's Minerals Specific Site Allocations Submission (Aug. 2008) states: "comprehensive restoration with adjoining land to provide heathland is preferred." (site 1A) and "Restoration would be to agriculture" (site 2A). This is incompatible with restoring the land for housing development.

Pages 48 & 49

"BT needs to be able to continue to evolve and develop and to have the facilities available to do that."

"There is a significant risk of losing jobs in the area if no comprehensive planning application and permission is secured and implemented at this stage"

"This would match BT's objectives to exploit its current research operations ... consolidate its reputation as a world leader ... retain high value jobs locally"

The comments on page 12 apply to these sections too. The development of BT's facilities, consolidation of its reputation and the provision of jobs have nothing to do with the building of 2,000 houses, and should not be used to blackmail the planning authority into granting permission prematurely (i.e. before the proper policies and framework is in place). There is no reason why planning permission for developments within Adastral Park cannot be separated from the proposals for housing development on the adjoining land. The former could then be decided by SCDC relatively quickly, meeting BT's business objectives, and the latter could be decided on its own merits and in a more appropriate timeframe.

Statement of Community Engagement

This document is grossly misleading. The various small tweaks BT has made to its proposals resulting from the consultation process completely fail to address the concerns of the local community.

Sections 7 & 8, and Appendix I

The questionnaire and the interpretation of the responses are extremely misleading. There are 2 main problems:

- Some of the questions are general, but the responses are assumed to be specifically about BT's proposals. For example, Q5 ("I think that linking new homes to where jobs are is important"). It is quite possible to agree with this statement in general but be opposed to its application in this instance, for all kinds of reasons. A tick in the 'strongly agree' box will be taken as support for BT's proposals, but may be nothing of the kind.
- Some of the questions assume the housing developments will go ahead, but the answers are being interpreted as support for the housing developments. For example, Q7 ("Do you think it is a good idea for BT to focus on the following areas as it works up its ideas into a clearer plan?") Anyone who is concerned about climate change will want to circle 'Yes' against 'Energy efficient buildings', but that doesn't mean they support BT's proposals, it simply means that if BT gets its way and builds 2,000 houses it is better that they are energy efficient than inefficient.

The most important question, which would have given genuine information on the popularity of BT's proposals was conspicuous by its absence: "Do you support BT's proposal to build 2,000 houses in the area adjoining Adastral Park?" Despite this omission, a majority of respondents who commented

on this topic were opposed to BT's housing proposals (see §8.26) Needless to say, their views were ignored in §9.

Section 8.13

"Several responses ... expressed the view that '**land controlled by BT should be returned to its original state as heathland**'. Representatives of BT were able to explain that land surrounding Adastral Park had not been 'natural heathland' in living memory".

A large part of the land surrounding Adastral Park was indeed heathland in 1947, and some remained as late as 1962, which is well within living memory:

"An aerial photograph dated to 1947 shows ... The rest of the airfield within the application site appears to be covered by rough heathland" (Environmental Statement, §11.25).

"The historic heathland ... has, since the end of World War II, been converted for use as arable fields and for a quarry" (Environmental Statement, §11.32).

"Both the Development Areas were heathland during the 1940s and 1950s. One small triangular area ... had been converted to arable use by 1955 but the remainder first appeared as cultivated land in photographs taken in 1962" (Environmental Statement, Appendix 11.2, p6)

It appears that these representatives of BT have been misleading the public about when the original heathland ceased to exist, in a vain attempt to counter their arguments.

Section 9.5

"This [1050 homes] is a difficult scale of development that does not readily support a range of services and facilities" This is at odds with the LDF Task Group's view (expressed at the meeting on 28th July, 2008) that building 1050 homes in Area 4 would allow for the strategic planning of services. No-one said at that meeting that 1050 homes was too few to support a range of services and facilities.

Section 9.6

"A development of 2,000 new homes... would help to meet Suffolk Coastal District Council's requirements to provide new housing" 2,000 houses is roughly double SCDC's housing requirement for the Ipswich Policy Area. It is far in excess of the identified need.

"Following consultation, BT's proposals have been developed to incorporate suggestions including: ..." It would appear from this that the list which follows is of features that weren't in the original proposals but have been added in response to the consultation. This is at best an exaggeration, but more accurately it is plain false. Every one of the facilities listed (except allotments and a public house) was already proposed by BT in its 'Martlesham made for innovation' document of Summer 2007, i.e. before the consultation proper started. This comment also applies to most of §10.2

Section 9.9

"In response to comments raised on landscaping and open space, BT's proposals have been developed to include A large new public park:" The public park was already proposed by BT in its 'Martlesham made for innovation' document of Summer 2007, i.e. before the consultation proper started.

"... incorporation of clearly identified areas of heathland ..." To claim this as an adequate response to public comments is ridiculous. In the Design and Access Statement, §4.5.2, in the table of land use, heathland is not listed – presumably the area covered is too small to be worth mentioning. In the Environmental Statement, §12.231, perimeter planting and green corridors are described as having the potential to accommodate heathland. But in the Design and Access Statement, §4.5.2, in the table of land use, green corridors is not listed and perimeter planting is allocated just 7.98ha. Even if all of this were made into heathland (which is unlikely and undesirable as the main purpose of perimeter planting is to act as visual screening) it would only be 4.9% of the total site area.

The Waldringfield Wildlife Group (with the support of most of the people of Waldringfield) wrote to BT in Jan. '08 suggesting that BT use the land adjoining Adastral Park to re-generate the original lowland heathland, *instead of* building the houses. This is very different from creating a few small pockets of gorse, etc. in amongst 2,000 houses. Why don't BT come clean and admit that they have simply ignored the WWG's proposals, and other similar suggestions?

Appendix H – Listening to Waldringfield

In Oct. '07, at the presentation by BT in Waldringfield Village Hall, there was total hostility from the public to BT's proposals to build 2,000 houses. It is no exaggeration to say that the people of Waldringfield are furious and outraged at what BT is proposing, for all sorts of reasons. The response was similar at the exhibition in April '08.

None of this is even mentioned in this document, let alone acted upon. The cosy picture painted of BT "listening to Waldringfield" and "responding" "to secure the best possible future for ... the local community" is rubbish. BT has totally ignored the views of the overwhelming majority of the people of Waldringfield, who do not want 2,000 houses built on their doorstep.

On 28th August 2008, Lawrence Revill (MD of David Lock Associates) wrote to Philip Ridley (Head of Planning, SCDC) to explain why BT was submitting its original application earlier than expected. One of the reasons he gave was "... alternative arguments and approaches may be raised, potentially reinforced by better organised local objectors." Attempting to wrong-foot the local community by submitting the application early in the hope that they will be less well organised is hardly in keeping with BT's claim that it is responding to the views of the local community.

Employment Statement

Waldringfield Parish Council broadly supports BT's proposals to modernise the facilities at Adastral Park, and thereby to create new jobs in the area. Insofar as this document relates to the land and buildings within the existing Adastral Park area, Waldringfield Parish Council supports its conclusions.

However, it should be noted that it is perfectly possible to modernise the facilities at Adastral Park (including the University and hotel), and generate new jobs there, without building 2,000 houses on the adjacent land. The improvements to the facilities in Adastral Park should be funded out of operating profits, as has happened many times in the past.

Environmental Statement

Section 3.41

"Other changes to the illustrative master plan ... include: ... Heathland" What heathland? In the Design and Access Statement, §4.5.2, in the table of land use, heathland is not listed – presumably the area covered is too small to be worth mentioning.

Sections 6.53 & 6.72

"Existing local communities, particularly long established communities are not likely to see any significant impact, negative or otherwise, on their identities or functions". "... the identity and cohesion of these communities will not be significantly affected" These statements are outrageous! Waldringfield, Waldringfield Heath, Brightwell, Newbourne, etc will be overwhelmed by the nearby urban sprawl of this enormous development. Their rural character will be totally destroyed. This is admitted later in the document: "Regardless of the quality of the development, its urbanising influence on the surrounding countryside is considered to be adverse" (§10.93) and "... the development will obstruct some views and have an urbanising effect on others" (§10.117)

To give another example, the road into Waldringfield in the summer is regularly a constant stream of traffic going to and from the Maybush public house. With 2,000 new households at one end of this road, what is already a dreadful problem will get far worse.

And another example: the relocated sports pitches will cause severe noise and light pollution, destroying the rural ambience of Waldringfield Heath and Waldringfield.

"The tourism and recreational functions of some communities such as Waldringfield may be heightened ..." Waldringfield cannot cope with more tourists (see above). More generally, tourism (i.e. people visiting from outside the area) is much more likely to be destroyed – who wants to spend their holidays in suburbia, or next to it? This is why Waldringfield is currently a tourist destination and Kesgrave, Grange Farm and Martlesham Heath aren't. If this housing development is approved, the tourists will simply go to prettier, more rural areas (if there are any left!)

Section 6.73

"It can therefore help facilitate 'energy or carbon consciousness'" The idea that visitors will be drawn to the site, to be informed about 'sustainability' and have their 'carbon-consciousness' facilitated is ludicrous. A far better way to do this would be for BT to follow its own environmental policies and return the land to heathland. This would have a far smaller carbon footprint than building 2,000 houses, with their associated tarmac roads, concrete driveways and energy-consuming cars and home appliances. BT could then publicise its environmental credentials as a genuine example to all.

Section 6.81

"Integration between the new residential community, the redeveloped employment site and the surrounding area (including overcoming the severance created by the A12) will to some extent depend on the legibility, ease and appeal of the walking and cycling provision." The new housing estate will be completely disconnected from the other urban areas east of Ipswich, such as Martlesham Heath. The A12 and the BT buildings in Adastral Park will form a barrier isolating the new residents from Martlesham Heath, and Martlesham Business Park will isolate them from Martlesham Village, making attempts to build linked communities impossible. No way of "overcoming the severance created by the A12" is suggested, apart from making footpaths and cycle paths more legibly signed and easier to use, which is hardly an adequate solution to the serious problem of bringing the two separated communities together.

Section 7

The Transport section completely ignores the effect of the extra households on the road to Waldringfield, Newbourne Road and other small rural roads in the area (see comments on §6.53, the Planning statement, p47, and the Transport Statement, §7.143).

Sections 7.14

The assessment of the impact on the transport system is wildly optimistic. The A12, A14, A1214 and Foxhall Road are all regularly gridlocked. They will probably get worse without this development, but with it they will certainly get very much worse.

"The development will add traffic to the A1214 and Foxhall Road corridors to/from Ipswich but would not create any additional capacity problems compared to the situation without development" This does not make sense. If the development adds traffic to these roads (that are already heavily congested) how will it fail to create additional capacity problems?

Section 8

The Air Quality section completely ignores the polluting effect of the extra traffic on the road to Waldringfield (see comments on §6.53 and the Planning statement, p47). Table 8.7 summarises the traffic data used in the air quality assessment, but doesn't include the road to Waldringfield. The absence of receptor locations anywhere east of the site (Fig.8.2) also shows that Waldringfield has yet again been ignored.

Section 10.66

Among the potential receptors listed are "potentially around 5 residential properties close to the site perimeter at Martlesham Heath, Sheepdrift Cottage and Waldringfield Heath". There are 17 residences at Waldringfield Heath, a pig farm, an industrial estate (7 Acres) a caravan park (Moon and Sixpence), a golf course, a demolition yard (CDC) and a Baptist Chapel and community hall, all within 150m of the site (many are much closer). Why are these not included as potential receptors?

Section 10.87

"... a pattern of residential development that will be 2-3 storeys around the southern and eastern edges, rising to 4 storeys towards the centre of the site ...". 4 storey buildings will extend right out to

the far southeastern edge of the residential area ('residential spine' of land parcels R11 & R13), and along almost all of the western edge of the development by the A12 (land parcel R7) – see Design and Access Statement, Figs. 5.6 & 5.7.

Section 10.99 & Appendix 10.3

These views are grossly misleading. The wireframe models used in the proposed views do not accurately represent the visual impact the buildings will have. The photographs appear to have been taken with a wide angle lens, making the existing BT buildings and the models of the proposed buildings appear smaller and more distant than they would appear in real life. None of the photographs were taken in winter, when the trees would not be in leaf and their screening ability would be much reduced.

Also, the choice of views (Fig. 10.5) is totally inadequate – out of 10 views only 1 (view 3) is from a location on the edge of the development, and this is lacking a proposed view showing the impact of the development. Why are there no views from the C356 along the south of the site, or from the public footpath to the east of the site, or from the Moon and Sixpence, or from the A12?

It is stated that proposed view 3 is missing because the photograph was taken from within the site – couldn't another photo have been taken from the road? Is there a problem with views taken from within the site? One is led to the conclusion that proposed view 3 isn't shown because (unlike the other views) it would actually give a clear idea of the extent of the visual impact of the development (with 4 storey buildings in the foreground).

Section 10.102

With reference to the views from the AONB: "The predicted effect is considered to be no more than minor, adverse and not significant" We agree that it is adverse, but strongly dispute that it is minor and not significant. This conclusion is invalidated by the flaws in the methodology (see comments on Section 10.99 & Appendix 10.3, above).

Section 10.117

"The degree of impact [on local residents] is likely to be medium to high, resulting in a substantial or major effect that is significant" Quite so! A pity this conclusion is ignored in the rest of the application, and is flatly contradicted in many places (e.g. "Existing local communities ... are not likely to see any significant impact, negative or otherwise ..." (§6.53)

Appendix 9

The assessment of noise pollution does not take account of the sports pitches, which will generate large amounts of noise, much of it in the evening and at weekends. These are at the far southeastern edge of the site, and their noise will easily be audible from Waldringfield Heath and Waldringfield, probably also from Newbourne.

Appendix 10.2

The assessment of light pollution does not take account of the sports pitches, which will almost certainly have flood lighting. These are at the far southeastern edge of the site, and their lighting will easily be visible from Waldringfield Heath and Waldringfield, probably also from Newbourne.

Design and Access Statement

Section 3.2.2

"It [BT's proposals for Adastral Park] is the only potential development site in SCDC's 'Local Development framework Core Strategy Preferred Options Document' to be able to link jobs and homes within a properly planned development". Of the 5 areas considered in the earlier LDF Issues and Options document, the preferred option is furthest from 2 of the major local centres of employment – Ipswich Town centre and Ransomes Europark. It is unlikely that more than 3% of the residents of the proposed new houses in the preferred option will work at Adastral Park (see comments on the Planning Statement, page 16). The linkage between homes and jobs is far stronger for Areas 1 and 3 and particularly for Area 5, which is adjacent to Ransomes Europark.

Section 3.2.3

"The proposals for a sustainable energy strategy for the redeveloped Adastral Park are made more effective with the presence of homes that can use energy in the evenings and weekends to balance weekday demands from the employment areas." The neighbouring homes needed to balance demand are already there – in Martlesham Heath. The southernmost residential parts of the development site are in fact further away from the Energy Centre than most of the houses in Martlesham Heath. (And if the Energy Centre produces electricity, it makes virtually no difference where the consuming homes are). There is no need to build more houses in order to balance demand.

Section 3.3.2

"Adastral Park presents an opportunity to deliver jobs and homes in close proximity ..." But it is highly unlikely that the people who get the jobs will be the same as the people who will live in the homes (see comments on the Planning Statement, pages 16 & 17).

Section 3.3.3

"... capital is ring-fenced for investment in research and development". Surely BT can decide how to allocate its own funds. "... the opportunity exists to generate investment capital (from housing development) to help fund the upgrade and enhancement of the building stock ..." This should be done from operating profits, as has happened many times in the past. See also comments on the Planning Statement, pages 16 & 17.

Section 4.2.3

One of the changes 'informed by public consultation feedback (April 2008)' was to "Clearly identify heathland on master plan ...". However, there is no indication of heathland in Fig. 4.8. (and very confused indications elsewhere in the original planning application). In the revised application, there is no indication at all of where the heathland will be, apart from the statement that perimeter planting and green corridors are described as having the potential to accommodate heathland (Environmental Statement, §12.231).

Section 4.3

Change 1: The change of one of the southern exits from the site is an improvement as it means less traffic will need to go along the C356. (However it will obviously not affect the overall traffic impact on the Foxhall Road junction).

Change 6: A 20m perimeter is not wide enough, at least 50m are needed for a development of this size and building heights. Even with 50m it is doubtful that the higher buildings would be adequately screened.

Change 7: "This removes a potential source of noise nuisance from the Central Park" – and presumably adds a similar source of noise nuisance to the residents of Waldringfield Heath. In Fig.4.2 there is no indication of buildings associated with the sports pitches (changing rooms, etc), car parks or access roads, all of which will be needed.

Change 9: The SSSI will be almost as vulnerable as in the original application. It appears to be directly adjacent to the 4 story houses in residential parcel R13 (Fig. 5.7)

Change 15: It is BT's intention to build a further 500 houses on the land designated as 'Temporary open space', after 2025. We strongly oppose this, as all the problems associated with a 2,000 dwelling estate will be made worse (by 25%). Although the extra 500 houses aren't part of this planning application, designating the land in this way will pave the way for their approval in a future application. This land should be designated as 'Public Open Space'.

Section 4.5.2

In the table of land use, heathland is not listed – presumably the area covered is too small to be worth mentioning.

Section 5.2.1

"This requirement [for developers to exceed Government sustainability guidelines] assumes that Level achievement is technically feasible and will not affect project viability" This is an interesting get-out clause. Presumably if project viability is affected by the need to exceed Government sustainability guidelines, or is not technically feasible, the requirement on the developers will be dropped!

Section 5.6.2

The proposed residential buildings covering the major part of the development (Fig. 5.6) are up to 2, 3, 4, 5 and 6 storeys high. This is far too high to be obscured by the tree barriers (where they exists), and is not normal for residential housing, apart from apartment blocks. It is certainly not compatible with the claim that "formal tree planning, woodland and tree belts will become the most dominant features of the site" (§5.3.1).

Section 5.6.4

"The average density level is similar to ... Kesgrave and Grange Farm" But far lower than Martlesham Heath, and there are no 6 storey apartment blocks in Kesgrave and Grange Farm or Martlesham Heath.

"The lowest density [30dph] of residential development is located on the outer edges of the site, particularly towards southern and eastern perimeter boundaries" Fig. 5.7 shows 35dph housing on the western edge (R7), the southeastern edge (R14, R13 & R11) and the northeastern edge (R12, R10 & R2).

Section 5.7.10

"Lighting would also be low emission designed to control to avoid [sic] light pollution" It is difficult to see how a development on this scale could possibly avoid creating light pollution. ("... the area will inevitably change from an E2 [low brightness] to E3: medium brightness district" (Environmental Statement, Appendix 10.2))

Appendix

The planning permissions required for the extraction of sand and gravel from this area have not yet been obtained. This application assumes minerals extraction permissions and various details of those permissions will be given, and is therefore premature.

Section A.1

The comments on the Planning Statement, p12, also apply here. Market demands and BT's own operational requirements will not be addressed by building houses, and there is no justification for linking the modernisation of BT's R&D facilities to the proposed housing development.

"To succeed in meeting and delivering the growth strategy for the East of England new housing is required rapidly and Aadastral Park can help deliver it." The timescale for the delivery of SCDC's housing allocation is completely separate from this application – there is no evidence that SCDC would have difficulties in meeting its targets if the housing proposed in this application were refused or delayed.

Transport Statement

No mention is made of the impact of the development on the emergency services. The proposed development will add over 3,000 vehicle trips per day to the network in peak hours (see comments on §6.34). This will increase road congestion, particularly on the A12, A14, Foxhall Road, A1214 and C356, and is bound to make it more difficult for emergency vehicles to move quickly, and will increase response times, possibly endangering life.

Section 5.43, 5.44 & 5.46

BT admits that "the existing bus services from these towns [Woodbridge and Felixstowe] is very poor" and that "Journey times on Superoute 66 to/from Ipswich town centre and the railway station are relatively unattractive at present". There are no railway stations nearby, and BT's hope that one

might be built at Adastral Park or Martlesham is extremely unlikely to materialise. In other words, placing 2,000 houses in an area that is already poorly served by public transport will simply make matters worse. If the houses really must go somewhere, it would be far better to put them close to existing public transport routes, e.g. a railway line.

Section 6

If the proposed energy centre uses biomass fuel, which seems to be the most likely option, the fuel will need to be brought in to the site in lorries. No account is taken of this in the transport assessment. (It is not included in the 'Service Trips': "For the future development, service trips have been assumed to increase in proportion with the increase in staff numbers", §6.15) The Energy and Carbon Strategy fails to provide any indication of how much biomass fuel will need to be stored onsite, or how many lorry loads per day will be needed to supply the energy centre.

Section 6.31

"The primary school is intended to provide for the proposed residential development, therefore these trips are assumed to originate from and remain contained within the proposed development". This assumption is very dubious. Parents have the right to choose a school for their children, and may choose one outside the catchment area, for one reason or another. For example, siblings may already be at another school, or parents may prefer private education, or a faith based school. This means that 'external' primary school trips should be assessed and included in Tables 27 and 28.

Section 6.33 & 6.34

"... the trips were assumed to originate from the proposed residential development and surrounding areas". Local retail trips (Table 23) have not been included in the summary table (Table 28), presumably because they are assumed to be entirely within the development site. But the above quote correctly includes "and surrounding areas", which by definition are *outside* the site and should be included in the total. Most of the local villages fall into this category, as they do not have shops.

The same argument applies to health Centre trips (Table 24), which are also not included in the summary table. Most of the local villages fall into this category, as they do not have health centres.

Section 6.46

Table 28, which shows the net increase in vehicle trips associated with the proposed development, is based on the data from Tables 15 to 26. Apart from the omissions described above (see comments on §6, §6.31, §6.33 & §6.34) the figures have been correctly copied from these earlier tables into Table 28 for each of the different trip types except residential, for which they differ wildly:

Table 19 (Residential Trip Generation)

	AM Peak Arrivals	AM Peak Departures	PM Peak Arrivals	PM Peak Departures
Number of vehicles	271	786	761	411

Table 28 (Net Increase in Vehicle Trip Generation)

Nature of Trips	AM Peak Arrivals	AM Peak Departures	PM Peak Arrivals	PM Peak Departures
Residential	50	579	560	302

No explanation is given for the discrepancy. If there is a genuine reason for it, this should be provided, so the public can assess its validity. In the absence of such an explanation, we have to assume it is a mistake.

Assuming Table 19 is correct and the error occurred in copying the data to Table 28, then there are in fact 738 more 'extra trips' than shown in Table 28 ((271+786+761+411)-(50+579+560+302)=738). So instead of a grand total of 2,209 extra trips per day resulting from the development (obtained by adding the totals for all trip types in Table 28), we actually have **2,947 extra trips per day**. This is 33% more than the original total - a huge error. (If the more realistic Sensitivity Test 1 figures are used, we have 2,399 extra trips per day in Table 28, which should really be **3,137 extra trips per day**.)

If Table 28 shows the correct data and Table 19 is wrong, that would invalidate most of §6.17 - §6.23, and raises the question *where does the data in Table 28 come from?* It is also the case that residential trips to and from Waldringfield and Newbourne have been wrongly excluded from these figures (see comments on §7.134).

Apart from the fact that these figures represent an enormous increase in traffic for the road system to have to cope with, the presence of such a large and basic error undermines confidence that the rest of the data provided in the Transport Assessment is accurate, and calls into question the validity of the exercise.

Sections 7.47 to 7.52

The introduction of traffic lights on the A12 junctions will cause significant delays in several parts of the local road network. For example the traffic approaching the Foxhall Road/A12 junction in a southerly direction will experience a doubling of journey times (from roughly 50 seconds to over 100 seconds over the set distance) during the am rush hour, in 2018 (Fig. 7-10).

Section 7.140

Moving one of the southern exits closer to the Foxhall Road junction is an improvement on the original plan, but it doesn't affect the total number of vehicles going through the Foxhall Road junction.

It is not clear how the PICADY capacity assessments were done, but the conclusion that the 2 new junctions on the south side of the site will "operate satisfactorily in both the AM and PM peaks in 2018" is obviously flawed. There is usually considerable delay at the Foxhall Road roundabout, approaching from Heath Road, during rush hour and often at the weekends. This traffic originates mainly from Waldringfield and Newbourne (combined populations approximately 600). This will be made much worse by the extra traffic leaving the new housing estate (estimated population 4,800) from the 2 south side exits. From the size of the populations feeding into this road, we can expect traffic volumes to increase nine-fold.

Most of the residential traffic will use the southern exits as these are the nearest to the houses. BT's own figures show that the extra traffic generated by the new residents will be more than 2,400 trips per day (although even this is an underestimate – see comments on §6.45), far in excess of current traffic levels. The large amount of extra residential traffic is due to the fact that most of the new residents will not be employed at Adastral Park, but will commute to work elsewhere, and most will travel by car.

Section 7.143

"With regards to residential traffic, there are few facilities within these villages [Waldringfield and Newbourne] that are not available more conveniently either within the proposed development or within the Ipswich build up area." This is simply not true. The Maybush at Waldringfield and the Fox at Newbourne are popular village pubs, the former enjoying a unique riverside location. Waldringfield also has an attractive beach (the only one between Woodbridge and Felixstowe Ferry), and many widely used footpaths. The Newbourne Springs SSSI is also very popular. Traffic modelling based on the assumption that very few people will drive to Waldringfield or Newbourne because there are "few facilities within these villages" is therefore fundamentally flawed. It is very likely that large numbers of the new residents will be attracted to the facilities at Waldringfield and Newbourne, and will cause severe congestion on the narrow (in places single track) roads, which are already severely congested in the summer and at weekends.

Section 9.13

"... it is estimated that the development will add in the order of 1100 vehicle trips to the network in the peak hours." Where does this figure come from? If it refers to vehicle trips per day, it certainly doesn't agree with the data in Table 28, which gives 2,209 extra trips per day (2,399 if the more realistic Sensitivity Test 1 is used). If it refers to vehicle trips per rush hour, it roughly reflects the data in Table 28 (1,037 extra trips for the AM peak, 1,172 for the PM peak), but it should be made clear that it refers to each peak, not the daily total, and it doesn't use the more realistic Sensitivity Test 1. Either way, the figures are in fact wrong – the total should be at least 2,947 extra trips per day, consisting of 1,465 extra trips for the AM peak and 1,482 for the PM peak (see comment on §6.46, above). These figures should actually be even larger, because they do not include 'external'

primary school, retail, energy centre (biomass delivery) or health centre trips (see comments on §6.31, §6.33 & §6.34, above).

With such a large underestimate of the extra vehicle trips, the assessment of the impact these trips will have on the road network must also be an underestimate, and it follows that the proposals for mitigation are totally inadequate