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Outline planning application for up to 2000 dwellings on land to the south and east of Adastral Park

DC/17/1435/OUT | Outline planning application for up to 2000 dwellings, an employment area of c0.6ha (use Class B1), primary local centre (comprising use Classes A1, A2, A3, A4, A5, B1, C3, D1 and D2), secondary centre (comprising possible use Classes A1, A3 and A4), a school, green infrastructure (including Suitable Accessible Natural Greenspace (SANGs), outdoor play areas, sports ground and allotments/community orchards), public footpaths and cycleways, vehicle accesses and associated infrastructure. | Land South and East Of Adastral Park Martlesham Heath Martlesham Suffolk

This letter is submitted by **Waldringfield Parish Council** in objection to the above planning application. With the professional advice of Michael Robson, Director of Cerda Planning, having rigorously analysed the current planning application and reviewed the relevant national and local planning policy, we are adopting a position of **strong objection** to these proposals.

Our strong objections relate to the following matters:

- Unsafe and inappropriate access and subsequent severe impact on the local highway network
- Proposed offsite transport mitigation
- Scope of Transport Assessment
- On-site Green infrastructure
- Greenspace buffer requirements
- Proposed Deben SPA mitigation (off-site)

Unsafe and inappropriate access and subsequent severe impact on the local highway network

1. The applicants propose four entry/exit points into the development; these will be phased in tandem with the delivery of the development.
2. The two access points onto the Ipswich Rd were clearly described as 'secondary' in the *Second exhibition Draft Masterplan, Key Local Highway Improvements map*. However, all of the application documents show all four of the access points as 'Priority Access Points' and all four link directly, via 'primary roads', into the main boulevard. There is no indication that the two access roads to/from the Ipswich Road are to be treated or designed as secondary roads, i.e. intended to take less traffic than the A12 access points and the main boulevard. The Ipswich Rd Access points are shown to be the only access points for the development throughout Phase 1 and will act as entry/egress points for construction vehicles.
3. During pre-application consultation meetings verbal communication from the applicant with Waldringfield Parish Council, SCC and SCDC indicated that after the completion of Phase 1 the Ipswich Rd Western Access will be downgraded from a secondary access to a non-vehicular route. The development would ultimately have 2 priority access routes via the new junction on the A12 and the new junction at the Northern Quadrant, plus 1 secondary access route via the Ipswich Road Eastern Access.
4. However, there is no reference to this in the application documents, on the contrary the Planning Statement states that once access to the development is gained from the north "The access strategy for the proposed development will not prejudice the existing access points and will coalesce effortlessly" (*Planning Statement, paragraph 13.5*).
5. Furthermore, it is unclear when the main boulevard and the on-site road network will be delivered. The Planning Statement says "The development has been carefully phased and assessed to ensure that new housing is properly and adequately serviced with new transport and community provision" (*Planning Statement, Table 8.2 p23*)
6. The Planning Statement also states that "Drawing number 31677/07/D identifies the phases of the development, commencing with the central site area served by an access from Ipswich Road" (*Planning Statement, §23.1*), i.e. the central site area (Phase 1) will be served by access from the Ipswich Rd only.
7. Whilst it is accepted that the intention of the developer was that the Ipswich Rd access points were 'secondary access points', if they are the only functioning access points during the first phases driver behaviour will have already been established and subsequently traffic will radiate to the Ipswich Rd access points.

8. The plans should be amended so that the new junction on the A12, linking to the main boulevard, is functioning before construction on the development begins. The Ipswich Rd Western access point would not then be needed and could be removed from the plan. Specific measures to ensure that the Ipswich Rd Eastern Access is an actual 'secondary access/road' should be detailed in the plan. Without these measures the Ipswich Rd access points would inevitably be regarded and used as the main points of access for the development. These measures would help alleviate concerns regarding inappropriate use of Ipswich Road.
9. It should also be noted that there is an unadopted access point to the Brightwell Barns complex (expansion of which is included in the planning application). This existing access has recently been widened and is located just to the west of the proposed Ipswich Rd Western Access point.
10. Ipswich Road is characterised by its narrow nature, rural appearance and setting. In the vicinity of the proposed access points there are two sharp bends and a hill brow (hidden dip) with poor visibility of oncoming traffic. It is however the main route into Waldringfield and Newbourne, and is vital to these communities. Proposing that construction traffic and future residents use the Western Access clearly fails to accord with paragraph 32 of the National Planning Policy Framework (NPPF), which states safe and suitable access to the site should be achieved for all people.
11. By failing to provide within Phase 1 at least one access point directly onto the A12, the applicant has failed to demonstrate that safe access can be gained into the site and therefore has failed to demonstrate that the application will not cause severe residual cumulative impacts.
12. Proposing priority/primary access, as shown in the application, from an unsuitable location will result in a significant intensification of vehicle movements along Ipswich Road, further threatening the safe access and free flow of traffic on the local highway network. The amount and type of traffic generated by the proposal is not acceptable in relation to the capacity of the road network in the locality of the site, in particular Ipswich Rd.
13. If the Council is minded to grant approval for the Priority Access points off Ipswich Road, we would expect to see a robust set of conditions that ensure the applicant must downgrade the Ipswich Rd Eastern entry/exit point to a secondary route and the Ipswich Rd Western entry/exit point to a non-vehicular route before Phase 2 is granted permission, and certainly before the start of Phase 2 construction. Leaving these issues to Reserved Matters is not acceptable.

14. Clarification is needed regarding the cessation of quarrying activities at the site to ensure that HGV quarry traffic has permanently ceased using the Ipswich Rd access points before Phase 1 construction starts.

Offsite Transport mitigation

15. The applicant proposes a number of measures to mitigate the impact on the local highway network. The measures claim to enhance the local highway network, however when considering individual mitigation measures, it is clear that a number of the proposals fail to ensure adequate highway safety.

Foxhall Rd/A12 Roundabout (drawing 10391-HL-22)

16. The Ipswich Rd approach to the Foxhall Rd roundabout currently carries mainly local traffic from the surrounding villages of Waldringfield, Newbourne and Brightwell. A significant amount of the traffic from the new development will use the Ipswich Rd access points creating a huge increase in traffic approaching the roundabout from this direction. The applicant also acknowledges that the development will add significantly to the already very high volume of fast moving traffic on the A12.
17. Alterations are proposed to the Foxhall Rd roundabout, including widening the Ipswich Rd approach and increasing the number of lanes approaching from the A12 to 4, with a left filter lane.
18. Rather than mitigate the effect of the increase in traffic on both the A12 and the Ipswich Rd, the resultant road layout makes it much more difficult for the Ipswich Rd traffic to enter the roundabout. To do so involves traversing 3 lanes of fast moving A12 traffic rather than the current 2, a much more challenging manoeuvre. Intensifying this circumstance will result in a highway safety issue, therefore failing to ensure the safe and free flow of the local highway network.
19. Further work is required by the applicant to provide appropriate mitigation, at the very least traffic calming or traffic light measures should be implemented to ensure highway safety.

Speed restriction measures on Ipswich Rd

20. It is also noted that speed restrictions are proposed along the Ipswich Road: "[There is an aspiration to reduce the speed of the A12 to 50mph, and Newbourne Road/Ipswich Road to 40mph](#)" (*Second exhibition Draft Masterplan, Key Local Highway Improvements map.*) However, there is little detail regarding Ipswich Rd in the application documents

other than a reference in drawing 10391-HL-04/05 to the Ipswich Rd access points. The evidence base that recommends the speed restriction has not considered journey times out of Waldringfield along the Ipswich Road. Given that this is a significant route for residents within the local highway network the traffic assessment should reference these vehicle trips and journey times. In the absence of such data it is clear that the predicted increase in vehicle movements has been undervalued. The undervaluing of vehicle movements could undermine the traffic measures proposed and therefore we recommend extending the proposed 40mph speed restrictions along Ipswich Road to the Heath Crossroads, and that a 30mph speed restriction is placed on the remaining length of Ipswich Rd into Waldringfield. Failing that, the proposed 40 mph speed restriction should be extended along Ipswich Rd to Waldringfield village to ensure the safe free flow of the traffic.

Northern Access onto Gloster Rd T-Junction (drawing 10391-HL-06)

21. As well as being a priority route from the development site for those heading north on the A12 and along Gloster Rd towards the retail area, this junction serves as a major access route for the BT employment site. The congestion at the Gloster Rd junction with Barrack Square then the A12 is caused by the queue of BT employee traffic along Barrack Square, not by traffic turning left into Barrack Square from the A12. WPC had understood that as the applicant had decided not to replace affected A12 roundabouts with traffic lights there would be traffic lights at the Gloster Rd/Barrack Square junction, but these are not shown on the drawing 10391-HL-06. Negotiating the queue on Barrack Square is not improved by the current proposals. The issue is further complicated because BT employees often drive north to avoid this and the A12/Eagle Way junction. This then creates further congestion at the Felixstowe Road and A12/Eagle Way (Tesco) junctions. This would be exacerbated considerably by the additional traffic generated by the development.
22. The current mitigation proposals regarding the affected roundabouts on the A12 will not deliver the necessary mitigation and will result in increased congestion and a reduction in road safety.
23. If the Council is minded to approve the mitigation packages in their current form, the Council should ensure mitigation is implemented before the occupation of any development within Phase 1.

Scope of Transport Assessment

24. In our response to the EIA Scoping Report, WPC said "Given the scale of housing allocations in the Felixstowe and East of Ipswich Area the traffic and transport assessment should include the Orwell Bridge, the A14, the Foxhall Rd, the A1214, and the minor roads such as Newbourne Rd (Waldringfield Heath crossroads to the Martlesham Red Lion) and the Ipswich Rd (Waldringfield Heath crossroads to Waldringfield)"
25. The response was that the scope had already been agreed with SCC and a copy of the scoping note will be provided within the Appendix of the Transport Assessment (*Scoping Response and Actions, p2*). The Scoping Note referred to says: "Through discussions with SCC, it has been identified that the development could have a wider impact outside the Paramics study area. Therefore, it has been agreed that SCC will provide outputs from the Strategic Traffic model to assess further locations" (*Transport Assessment, Appendix A, §8.6*).
26. We have found no attempt to identify impacts outside the study area. In particular, no attempt has been made to take on board our request that the impacts of the housing allocations in the Felixstowe and East of Ipswich Areas (and we now add the traffic from the construction of Sizewell C and the Felixstowe Port expansion) are included. Also, no attempt has been made to assess the impact on the minor roads such as Newbourne Rd (Waldringfield Heath crossroads to the Martlesham Red Lion) and the Ipswich Rd (Waldringfield Heath crossroads to Waldringfield). These are serious omissions – Ipswich Rd into Waldringfield and Cliff Rd in Waldringfield are often congested at peak times, and Newbourne Rd from the Heath crossroads to the Martlesham Red Lion is often used as a rat run to avoid the A12 junctions. These problems will only get worse with the proposed development, and the increased difficulty of driving north on the A12 from the Foxhall Rd towards Woodbridge. It is important that the significant impacts are understood and that appropriate measures are introduced to mitigate them.
27. The *Transport Assessment, Executive Summary* states that "Overall, the development provides mitigation in relation to the transport networks and aims to minimise travel through the implementation of the Travel Plan to sufficiently minimise the impact of the development on the highway network".
28. The Travel Plan appears to have been designated a reserved matter, and is briefly mentioned in the Heads of Terms (*Planning Statement, Appendix 2, §4*). WPC does not consider this satisfactory – without a Travel Plan how can the impact of the development on the roads network and transport infrastructure be properly assessed? The traffic data, which is used to assess the options for the various roads and junctions, will be affected by

the number of people using public transport (as an alternative to cars), which in turn will depend on the public transport provisions specified in the Travel Plan.

29. When the Travel Plan is produced, WPC would like to be involved. It is important to many people in Waldringfield that they are connected to the public transport system more effectively than at present. WPC's suggestion for achieving this is to provide a shuttle service (mini-bus?) between Waldringfield (and possibly Newbourne) and the bus services within the development.

On-site Green Infrastructure

30. The amount of greenspace is significantly less than that presented to the Planning Inspector in the External Examination in 2012. The approval of the Core Strategy was based on the assurance from BT that 54ha of greenspace would be provided and SCDC and NE agreed that this was the correct figure. The current application provides a total of 34ha of greenspace, of which some 25ha are designated as Suitable Alternative Natural Greenspace (SANG) (*Environmental Statement, §1.1.4*).
31. Notwithstanding minor differences in how the greenspace has been calculated, this is a significant lowering of the provision. WPC understands that NE has approved the current figure, and appreciates that providing more greenspace could result in the applicant increasing the housing density, which would be undesirable. However, we still find it extraordinary that there is such a large discrepancy between two apparently robust calculations, and note that no explanation of why an occupancy rate of 1.57 people per household is still being used in the calculation of the amount of SANG (*Planning Statement, §9.7, p31*), despite its obvious flaws, which we pointed out in our response to CEG's questionnaire in February 2017.

Greenspace buffer requirements (South Eastern Corner)

32. The National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For decision-taking this means:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.
33. However paragraph 14 includes a footnote which states policies relating to Areas of Outstanding Natural Beauty can restrict development, even if the development accords with the Development Plan.
34. The footnote highlights and confirms that valued landscape such as AONB's are given significant weight and protection in the planning process.
35. It is noted that the applicants propose a green buffer to the south east of the site, however the depth of the buffer is clearly inadequate given the buffer will provide separation between the development and the Suffolk Coast and Heaths Area of Outstanding Natural Beauty lying to the east of the site. Given that proposed green buffer borders open countryside to the east and south, the importance of providing a comprehensive urban to rural buffer is key to maintaining existing landscape, ecology and interconnected wildlife corridors.
36. Policy SP20 of the Core Strategy states that developments within the Eastern Ipswich Plan Area must give priority to creating a safe and attractive environment, including the provision of advanced planting and landscaping to create new settlement boundaries that blend with the surrounding landscape and contribute to biodiversity and the ecological network, ensuring that developments preserve and enhance environmentally sensitive locations within the Eastern Ipswich Plan Area and its surroundings.
37. The policy highlights that the developments must **enhance** environmentally sensitive locations and therefore given that the landscaping to the east and south of the application site acts as an important ecology corridor and forms part of a wider ecology network, the proposed, 0.6ha is insufficient.
38. The photomontages of the view of the south eastern corner on completion and in year 15 (*Environmental Statement, §11, Fig. 11.10, viewpoint 5, p94*) appear to show virtually no buffering effect – the entire frontages of the houses are almost completely visible and un-obscured. This representation of the final appearance of the development when viewed from the AONB reinforces our point that the buffering is totally inadequate. It should be increased without increasing the housing density in the adjacent area of the development. Tree planting, including provision of new, mature trees, should begin before construction starts to ensure that the trees are sufficiently mature to provide a more appropriate buffer between the development and the AONB.

39. This area currently enjoys dark night skies with only occasional spots of light visible from local buildings and the Felixstowe glow in the sky to the south. At night, the light from the development, including from houses in the southeast corner, will be highly visible from the AONB without more substantial buffer planting.
40. Paragraph 115 of the NPPF states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. Therefore provision of a sufficient green buffer should be a key consideration in determining the application so as to ensure the separation distance between the development and AONB is not undermined and that valued landscape is protected.
41. It is also noted that to the south east the application boundary borders an existing arable field. It is understood that the owner of this field has previously voiced the site has development potential. We seek clarification that the site is not included under the Adastral Park allocation and that development will be restricted in order to maintain the green buffer and protection of the neighbouring AONB, providing suitable urban to rural blending. If any development came forward for this land it would directly conflict with Policy SP14 of the Suffolk Coastal District Local Plan.

Greenspace buffer requirements (Perimeter Planting Ipswich Rd)

42. More detailed information is needed regarding tree planting, maturity of new planting etc. The existing mature trees along the Ipswich Rd boundary were all planted at the same time, and are likely to all die about the same time, so it is necessary to plant a wide variety of trees, and to continue with this, to ensure the perimeter buffer is maintained over the decades to come. It would be desirable to increase the depth of the buffer zone without increasing housing densities in the adjacent development area – our suggested depth would be at least 30 metres (which we understand to be an accepted standard) rather than the 20 metres currently proposed. Existing trees along the perimeter, in particular along the Ipswich Rd, should be protected by conditions applied at the outline application stage, even if they are outside the minimum buffer depth.
43. In order to ensure integrity, we request involvement with SCDC on an appropriately worded condition to ensure the early implementation and retention of a comprehensive sized green buffer.

Proposed Deben SPA mitigation (off-site)

44. We turn now to the position on offsite mitigation and Policy SP20 of the Suffolk Coastal District Local Plan. Given the Local Plan is consistent and compliant with the NPPF, full weight should be given to the policy. The policy states:

"Specifically, on land to the south and east of Adastral Park, strategic open space in the form of a country park or similar high quality provision will be required to mitigate the impact of development at this site and the wider cumulative impact of residential development on the relevant designated European nature conservation sites.

Infrastructure needs to be accorded priority include:

- (a) Provision of and increased access to open space both on and off-site to meet the mitigation measures outlined in the November 2011 Appropriate Assessment. This includes enhanced wardening and monitoring of visitor impacts upon designated European nature conservation sites." (SP20, LDF Core Strategy, p70 & p71)

45. Table 10 of the Appropriate Assessment outlines in full the mitigation required for the strategic allocation. The table expands on the requirements within Policy SP20 stating that mitigation must include:

"The provision of wardening and visitor management measures, guided by a visitor management plan, to manage and monitor recreational access and birds on designated sites. The designated sites include the Deben Estuary SPA/Ramsar and Sandlings SPA. These measures would be coordinated across the Coast & Heaths Area, and are likely to require a capital works programme, and on-site wardening."

46. However the applicant fails to address the appropriate mitigation within the submitted Environmental Statement or associated documents. Given that the Appropriate Assessment forms the evidence base for the adopted Suffolk Coastal District Local Plan the mitigation strategy should be comprehensively addressed by the applicant.

47. If the applicants fail to implement the mitigation highlighted within the Appropriate Assessment they will not only be in direct conflict with SP20 but will also be in conflict with Policy SP2 of the Suffolk Coastal District Local Plan which states any new homes identified by means of specific allocations will be phased at a rate commensurate with the provision of any necessary new and improved infrastructure provision. For those areas where nature conservation issues are screened as important, phasing will also need to accord with agreed mitigation.

48. Having reviewed the previous application submitted by British Telecom, it is clear that significant offsite mitigation measures had been proposed and substantiated; however,

the current application fails to comment on the scale of funding contribution. Instead the applicant states within the *Land south and east of Adastral Park, Martlesham Section 106 Agreement – Heads of Terms* that they will provide a financial contribution [per dwelling] to mitigate the residual impact from the scheme on the Deben SPA, in accordance with the Recreational Avoidance Mitigation Strategy.

49. However given that the Recreational Avoidance Mitigation Strategy is not yet fully adopted there is no indication that the financial contribution will be sufficient to mitigate the impact. The applicant's assertion that "The residual effect will therefore be neutral" (*Environmental Statement*, §8.6.5) cannot be justified and must be treated with a degree of scepticism until specific costed proposals are provided.
50. Given that Adastral Park is allocated as a strategic development and is the District's largest proposed residential development project, clarity is required over the contributions that will be made to offset the negative impact on the Deben SPA as well as the method of distribution.
51. As the Deben SPA acts as a meaningful recreation/leisure space for residents and tourists as well as an internationally important wildlife corridor, we respectfully ask that the Council ensure significant contributions are made that reflect the large scale of the development.
52. Without more detail it is not safe to assume that the off-site mitigation provision is in conformance with the Core Strategy's SP20. Considerably more detail must be included in the outline application.

Summary

53. In summary the application DC/17/1435/OUT should be rejected due to significantly failing to ensure appropriate and safe access, protect and enhance a necessary green buffer and failing to meet policy criteria in relation to offsite mitigation to protect significant, internationally recognised and valued landscape.
54. Waldringfield Parish Council is submitting a strong objection to the proposed strategic development in its current form. It has been highlighted that the proposal is contrary to a range of national and local planning policy resulting in the failure to create a safe and secure development.
55. As a major stakeholder in the planning application process we have engaged with the Adastral Park criteria outlined in the Suffolk Coastal District Local Plan and have highlighted numerous failings. The application should subsequently be revised in order to ensure necessary infrastructure and mitigation is agreed and implemented.

56. We trust these observations will be given significant weight in the decision making process.

Errata

57. The public transport map of bus routes (*Design and Access Statement, p 21*) omits the Route 4 (in blue) extending to Martlesham Heath Bowling and Tesco.

58. We are mystified by the statement "[Wherever possible, employees will be sourced locally from within Ealing.](#)" (*Environmental Statement Non Technical Summary, Table 13.1, §12 Noise*). We suspect a copy/paste error.