

**PLANNING COMMITTEE**

Monday 15<sup>th</sup> January 2018

**MARTLESHAM – DC/17/1435/OUT**

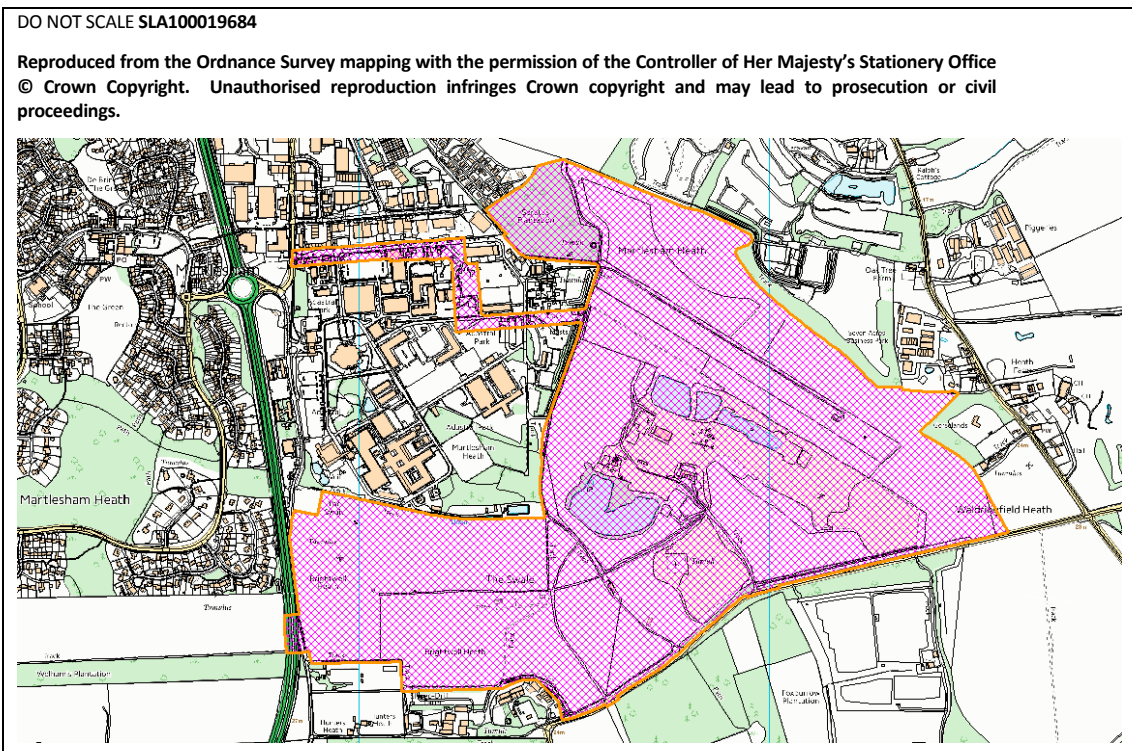
**Land South and East of Adastral Park, Martlesham**

**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 (SANG), outdoor play areas, sports ground and allotments/community orchards), public footpaths and cycleways, vehicle accesses and associated infrastructure. (PC 01/18)**

Report by the Head of Planning and Coastal Management

This site falls within the parishes of Martlesham, Brightwell and Waldringfield

**Expiry Date:** 24<sup>th</sup> July 2017 – Agreed extension of time until 16<sup>th</sup> January 2018



## **EXECUTIVE SUMMARY**

This application seeks outline planning permission for up to 2000 homes, an employment area (use class B1), primary local centre (comprising use classes A1, A2, A3, A4, A5, B1, C3, D1 and D2), secondary local centre (comprising possible use classes A1, A3, A5 and D2), an 'All Through' school, green infrastructure (including Suitable Accessible Natural Greenspace (SANG), outdoor play areas, sports ground and allotments/community orchards), public footpaths and cycleways, vehicle accesses and associated infrastructure.

It is presented to the Planning Committee due to the scale of the proposal, the representations received and due to the application being accompanied by an Environmental Statement.

It is located on a site where the Core Strategy and Development Management Policies Document (2013) seeks to deliver strategic housing growth in the District for up to 2000 homes. The submission of this application follows on from the withdrawal of a similar application (C/09/0555) previously submitted by BT Plc. prior to their sale of the site to one of the applicants, Carlyle Land Ltd.

The application is accompanied by an Environmental Statement (ES) as the applicants and council agree that the proposal should be assessed under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. An exercise to assess the scope of the EIA and the likely significant environmental effects has previously been undertaken. The scoping process resolved that the ES should assess the following possible effects:

- air quality;
- archaeology and cultural heritage;
- ecology;
- flood risk and drainage;
- ground conditions and contamination;
- landscape and visual impact;
- noise;
- socio-economics;
- transport and travel planning.

The ES also addresses the possible environmental effects of the proposals cumulatively with other relevant sites in the area along with necessary mitigation measures. The assessment of the effects of this application is not limited to the above areas and the application is also supported by a much wider range of surveys, assessments, plans and statements.

This proposal accords with the Development Plan and the benefits of the development would substantially outweigh its impacts. This proposal represents plan-led and infrastructure-led development which achieves compliance with the economic, social and environmental roles of Sustainable Development. It should therefore be approved.

The submitted application can be viewed on the Council's website through this web link: [www.eastsuffolk.gov.uk/adastralpark](http://www.eastsuffolk.gov.uk/adastralpark)

Philip Ridley

Head of Planning and Coastal Management

Case Officer: Ben Woolnough

**BACKGROUND PAPERS:** Planning Application File Ref No. DC/17/1435/OUT, C/09/0555 (withdrawn), C/08/1725 (withdrawn)

**Planning Committee Site Visit Date:** 30<sup>th</sup> May 2017

**Committee Date:** Monday 15<sup>th</sup> January 2018

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*This section contains a brief summary of each consideration section of this report and the page number of where this can be found.*

<i>Principle of Development</i>	<b><a href="#">98</a></b>
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The development would be located on a site where there is a Local Plan policy commitment to delivering strategic housing growth and associated infrastructure. This plan-led development would accord with the Development Plan and NPPF. It represents sustainable development and it would significantly boost the supply of open market and affordable housing in the District.

<i>Ecology and Biodiversity</i>	<b><a href="#">101</a></b>
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The proposed development is informed by an open space led masterplan. The majority of the open space proposed is required as mitigation to avoid impacts on designated sites in the area, specifically the Deben Estuary SPA. The proposal has been subject to extensive independent ecological assessment, scrutinising the proposed mitigation and agreeing that no likely significant ecological impacts would result. The application also has support from Natural England, the Statutory Consultee in this respect, and a Habitats Regulation Assessment has been completed. As part of the mitigation measures proposed the development would deliver £300,000 in funding towards the Recreational Avoidance Mitigation Strategy.

<i>Heritage and Archaeology</i>	<b><a href="#">110</a></b>
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The site contains designated and non-designated heritage assets. The most significant assets are the three bowl barrow burial mounds, which are Scheduled Monuments. Historic England have raised objections to the development as proposed because of their impact on the setting of the barrows, identifying 'less than substantial harm' to the setting of the barrows. The NPPF requires great weight to be given to this harm and for it to be assessed against the public benefits of the development. In this case it is considered that those benefits clearly and demonstrably outweigh the harm. Included in those benefits are benefits directly applicable to the heritage assets, including physical improvements, preservation and interpretation. The site has archaeological interest and has been extensively investigated already



as part of the minerals extraction. Further investigation can be secured by condition.

### *Community Infrastructure*

**115**

The site will deliver substantial on-site community infrastructure, including an all through school which would provide for all of the education requirements of future residents from pre-school through to sixth form age. The school also provides an opportunity for the County Council to address the existing secondary education place shortfall in the area. In the absence of alternative sites in the area for education development of this scale, this major infrastructure led development provides a valuable opportunity for this facility. The application would also deliver buildings and funds for community facilities, sports and recreation, healthcare and local policing. These will be secured through a section 106 agreement.

### *Movement and Transport*

**121**

The site is of a scale that can deliver substantial on-site services and facilities and is also co-located with existing major employment and retail facilities. The proposal represents sustainable development in its most positive form and the internal movement of residents within the site and immediate area would enable residents to minimise reliance upon private motor vehicles. The pedestrian/cyclist strategy has developed through consideration of the application to ensure that it will deliver a range of pedestrian and cycle links within and outside of the site. The development will also deliver funding for an improved/increased bus into the site and on to Ipswich.

Whilst the development will deliver extensive sustainable movement in the area and District, it will also contribute a substantial amount of traffic to the highway network. The proposal has been subject to a considerable amount of transport assessment and scrutiny, including independent advisors to the Highway Authority and Highways England and an independent assessment carried out for the Council. Following a detailed and collaborative highways modelling process and independent road safety audits, the Highway Authority conclude that the development and its significant highways mitigation would have an acceptable effect on the highway network.

### *Design and Layout*

**133**

As an Outline application, the application fixes a minor amount of design detail; however it does establish certain parameters, land uses, open spaces and routes along with the some detailed design principles. The site is proposed to be focussed around a central 'boulevard' route, Local Centres (including the school) and the SANG open space and lake. The application includes a detailed Design and Access Statement alongside an illustrative masterplan and a set of Environmental Statement Parameter Plans. Fundamental to guiding future reserved matters applications will be the series of proposed 'character bands' and their design principles for edges of the site, set out in the Design and Access Statement and to be conditioned. Following a detailed assessment of the application by the Principal Design

and Conservation Officer (Appendix 1) the outline proposal represents a good standard of design for this stage of the process.

### *Landscape*

**136**

The site lies largely within a quarried landscape surrounded by agricultural land and woodland. It is located within close proximity of the Area of Outstanding Natural Beauty; however the visual impacts on viewpoints in that area are limited to the south eastern corner of the site. In that location a landscaped open space area would be provided in the first phase of development (of between 30m-100m wide). Across the rest of the site, 20-30m landscaped SANG edges would be provided/retained, enabling the site to remain proportionately screened in rural views, particularly the southern and eastern edge. The western edge is more urban in character and the proposal would deliver a bold urban frontage to the A12, which is deemed appropriate for the context of the site.

### *Housing*

**138**

The proposal would deliver up to 2000 homes, 25% of which (500 homes) would be affordable housing. The proposal accords with Policy DM2 of the Core Strategy which expects 1 in 3 units to be affordable housing unless its provision is not required due to site conditions, suitability and economics of provision. The NPPF expects the deliverability of development to take into account the scale of planning obligations and other cost through a viability assessment. The proportion of affordable housing has been determined through a detailed viability appraisal process, taking the substantial infrastructure cost of this development into consideration. The result is less than 1 in 3 homes but it is policy compliant and deemed to be deliverable.

The 500 affordable homes proposed would be of an equal mix of affordable rent, intermediate rent, shared ownership and Shared Equity. All affordable units would be 10% larger than the minimum floor areas typically sought. Delivery of affordable housing would be throughout phases of the development to ensure that an ongoing stream of affordable homes would be delivered to an appropriate mix.

### *Drainage and Utilities*

**141**

The development of this site can deliver essential utility connections to all homes to ensure that they are provided with electricity, water, gas and foul drainage and off-site infrastructure can accommodate this level of growth. Where necessary the development will need to fund off-site infrastructure works. The site can also provide access to super-fast broadband to proposed homes, businesses and facilities.

The proposal has been carefully assessed in respect of surface water drainage, to ensure that surface water could be managed on site. The site does benefit from a very permeable ground conditions which would require less in the way of surface attenuation (basins and ponds) than would normally be expected.

*Environmental Considerations* **144**

This section of the report deals with some of the environmental effects of the development and the effect of existing and future conditions on residents of the development. Specifically these include noise, contaminated land, air quality and lighting. This section is informed by detailed professional input from the Council’s Environmental Protection team and it concludes that there are no adverse environmental impacts on the area or on future residents and where necessary environmental conditions can be mitigated.

*Creating a Community* **148**

In order to ensure that the community begins to establish from the earliest occupation of homes attention has been given to ways that this may be facilitated through the planning process. The applicants have submitted an initial draft Part 1. Community Cohesion Strategy to establish how conditions and obligations may support the creation of a sustainable community. This will draw upon elements of delivery of community facilities, travel planning, open space management and sports and recreational provision. Integral to this will be the establishment of the Management Company for the transfer and management of open spaces and community facilities. The Council will also seek to facilitate community cohesion through starting an Adastral Park Development Community Liaison Group. This will initially comprise of local representatives but will eventually transfer to residents of the development, so they may contribute in having a say in how the development progresses. Finally this section deals with the policy requirement for on-site public art, which will enrich the sense of community as the development grows. In addition the Community Cohesion Strategy and Section 106 agreement will enable funding of community policing and Neighbourhood watch co-ordination.

**Conclusion** **150**

The conclusion summarises the impacts and benefits of the development and the community and consultee contributions that have been made to the consideration of the application. This proposal accords with the Development Plan and the benefits of the development would substantially outweigh its impacts. This proposal represents plan-led and infrastructure-led development which achieves compliance with the economic, social and environmental roles of Sustainable Development. It should therefore be approved.

**Recommendation, Planning Obligations and Conditions** **155**

**Appendices** **159**

## 2. SITE DESCRIPTION

### *Parish boundaries and site ownership*

- 2.1. The application site comprises 113.3 hectares of land to the south and east of Adastral Park, Martlesham. The site falls within the boundaries of three parishes; Martlesham, Waldringfield and Brightwell. The majority of the site lies within Martlesham parish, the southernmost section lies within Brightwell parish and a small part of the most eastern edge of the site lies within Waldringfield parish.
- 2.2. The majority of the site is in the ownership of Carlyle Land Ltd. who purchased the majority of the site from BT Plc. and a smaller section from BPT Ltd. Part of the site proposed for a northern access road remains in the ownership of BT Plc. and Carlyle Land Ltd. have an option to purchase that along with the surrounding land and buildings for redevelopment. Parts of the application site within the red line boundary are owned by the Highway Authority as it consists of adopted highway land. This includes land around the southern Ipswich Road accesses and the A12 access.

### *Previous and current land uses*

- 2.3. Historically the site was heathland, as was much of the surrounding area to the north and west. The site has documented prehistoric archaeological interest as it contains three bowl barrows which are Scheduled Monuments. Two are located in the north of the site within an area of woodland known as Spratts Plantation and one is located in the western part of the site with a World War II pill box on top. During World War I the surrounding area was used as an air base by the Royal Flying Corps and later the base was significantly expanded for World War II. Use of the base ended in 1963. The air base was predominantly located under Martlesham Heath and to the north and west of the site. The runways of the base only extended into the western part of the site with the rest of the site having association with the base but without significant amounts of war time development. The site retains a number of World War II structures in its western area, these consist of two pill boxes and the base of a radio mast.
- 2.4. The site predominately consists of land used for minerals extraction, namely sand and gravel to a relatively shallow depth. Consent for minerals extraction on the site dates back to 1961 though the majority of the current extraction areas were consented by the County Council in 2011. Extraction is nearing completion on the western element of the site. The eastern side of the site is also in the process of extraction and that is expanding to the south east across current agricultural land. Based on current rates of extraction, the applicant anticipates that the commercial extraction of minerals will be completed within the next 3 years. A small area of resource is intended to be retained on the site for use in the development. Historic areas of extraction have been partly infilled with inert landfill and restored. As part of the minerals extraction, a

number of site boundary bunds have been created, notably on the western A12 boundary, the north eastern boundary and the southern boundary. These bunds were required as part of noise and dust mitigation measures for extraction and largely consist of top soil removed from extraction areas. The current minerals extraction consent requires the site to be restored in one of two ways; either to a platform level for residential development (subject to planning permission); or, to restore the site to agricultural land. Through this current application, the intention is to pursue the former option.

- 2.5. As set out above, the site is predominately used for Minerals extraction. The quarry access is located on Ipswich Road on the southern boundary of the site where a formally laid out access provides the only surfaced vehicular access to the site. This is used by all quarry traffic including heavy goods vehicles transporting sand and gravel from the site. The access leads into the centre of the site where a quarry compound is located along with a concrete batching plant.
- 2.6. Adjacent to the quarry compound and also within a central position in the site is a lake. This lake was formed in the earliest phase of minerals extraction in the 1960's and has been restored to a lake for a significant number of years. It has mature tree planting around its edges and it is currently used by a fishing syndicate for recreational coarse fishing. The lake is also currently used for some water abstraction for local irrigation. Surrounding the lake and leading north along the eastern boundary edge of Adastral Park is an area which has been restored from previous minerals extraction and partly filled with inert landfill.
- 2.7. In the far north corner of the site lies an area of woodland known as Spratts Plantation. The site also contains a roadside band of predominately pine trees along its southern boundary with Ipswich Road.
- 2.8. Areas of the site which are not currently subject to minerals extraction have an agricultural use. This includes land on the eastern boundary, where further extraction is due to take place. It also includes an area on the western boundary which is a stand off from minerals extraction and is currently left as set-aside due to the scheduled monument and WWII non-designated heritage assets it contains. Also in this area, in the far north-west corner of the site, adjacent to Barrack Square, is a small square parcel of land which is not within the application site. This land is owned by the County Council and it serves as a soak-away for the A12. The land is level and is a County Wildlife Site due to its acid grassland habitat.
- 2.9. There is one area of the site which remains used by BT and that is an 830m by 60m grass strip which is used by BT for testing of short range wireless equipment. This contains two structures which are not proposed to be retained and BT currently has direct vehicle access to this area from the west. This area is not a former runway, despite its appearance as one.
- 2.10. On the south western edge of this grass testing strip there is Site of Special Scientific Interest (SSSI) designated for its geological importance. This is known as Waldringfield Pit and it is of importance due to its exposure of different

strata deposits over a number of ice ages. This is proposed to be retained, protected and incorporated into the layout.

### *Surroundings land uses*

- 2.11. This description of surrounding land uses takes a clockwise route around the boundary from the central western edge of the site.
- 2.12. The adjacent site to the north and west is known as Adastral Park, it is owned by BT Plc. and it covers 40 hectares. Adastral Park is primarily a research and development centre for BT but also provides accommodation for associated industries in the field of information and communication technology (ICT). It is designated as a part of a General Employment Area and it contains 130,000 sqm of floorspace on the site in buildings ranging from single storey to 11-storeys high. The park is secured by a fence around its entire boundary with access controlled by security barriers. In addition to office and research and development accommodation on the site there are also associated warehouse units, a satellite station compound and other ancillary buildings. The northern access road proposed for the development runs through Adastral Park connecting the site's western boundary with Gloster Road and this area of Adastral Park is known as the 'Northern Quadrant'.
- 2.13. The site and the proposed access road also have a northern boundary with properties on the south side of Betts Avenue within the Martlesham Heath Business Park.
- 2.14. The north-east boundary runs behind part of a mobile home site off Anson Road, some agricultural land and the full south-western boundary of the Moon and Sixpence mobile home site. It then continues along the rear boundaries of residential properties and the Seven Acres employment site on Newbourne Road. The far eastern boundary is within an agricultural field which extends outside the site to the Newbourne Road/Ipswich Road/Heath Road crossroads.
- 2.15. The Area of Outstanding Natural Beauty (AONB) boundary runs along the eastern side of Newbourne Road, so falls within 100 metres of the site at its closest point. Waldringfield Golf Course is also located to the east on the opposite side of Newbourne Road.
- 2.16. To the south of the site, on the opposite side of Ipswich Road, lies agricultural land, a solar farm, two wind turbines and woodland.
- 2.17. Brightwell Barns office complex is a recently constructed B1 use office site which is expanding through a number of barn conversions and new builds. This lies on the southern boundary at the point that the site boundary moves away from Ipswich Road. The southern boundary then continues west along the rear of Sheep Drift Farm, which is partly used for caravan storage. The southern boundary then passes further west around an area of land used by BT for testing of equipment until it meets the western site boundary and the old Felixstowe Road where a café bus is parked. The western boundary runs north, parallel to the A12 until it meets Barrack Square, which is a dead end road serving Adastral Park and other business units adjacent to the A12. At this point the boundary runs west along the southern edge of Adastral Park.



- 2.18. On the opposite, western side of the A12 lies the Martlesham Heath residential area and an agricultural field immediately west of the site. The residential area of Martlesham Heath and the employment area west and north of Adastral Park is designated as the Martlesham Neighbourhood Plan Area. The Neighbourhood Plan is being developed by the Parish Council but is not yet at an advanced stage or made. The application site is not within the Neighbourhood Plan Area.

*Surrounding highway and Right of Way network*

- 2.19. The site is surrounded by a range of classified and unclassified roads to the north, south, east and west of its boundaries. The site has its closest relationship with the A12 to its west and Ipswich Road (C356) to its south.
- 2.20. The A12 runs immediately adjacent to the far western boundary of the site and this includes a pavement/cycle lane between the road and site. This dual carriageway passes the site between the Foxhall Road/Newbourne Road roundabout to the south and the Adastral Park/Eagle Way roundabout to the north. This A road is the responsibility of Suffolk County Council Highway Authority and it is not a trunk road. The closest trunk road, under the responsibility of Highways England, is the A14 to the south. The A14 and Highways England's responsibility terminates immediately north of the Seven Hills A14/A12 roundabout.
- 2.21. To the south of the site, Newbourne Road (C356) leads off the A12 roundabout to the south west of the site leading east. That road then turns north and then north east becoming Ipswich Road. At the eastern edge of Brightwell Barns this road first meets the southern boundary of the application site. It follows the southern site boundary north east for approximately 1.2 kilometres before passing neighbouring agricultural land and terminating at the Newbourne Road/Heath Road crossroads.
- 2.22. In the western part of the site, in its north west corner, a road named Barrack Square terminates at the site boundary. This is an unclassified dead end road which previously connected with the old Felixstowe Road, which is also a dead end road directly to the south of the western boundary. Barrack Square leads north, serving a number of office buildings on its western side and the main entrance to Adastral Park on its eastern side. It then leads on to the A12 at the Adastral Park/Eagle Way roundabout. From the entrance to Adastral Park on Barrack Square, a pavement and cycle lane commences leading north and then crossing to the west side of the road via a pedestrian crossing, approximately 150 metres north of the Gloster Road/Barrack Square junction. This pedestrian and cycle route then leads north and west, over the pedestrian and cycle bridge into Martlesham Heath residential area and onto its Local Centre.
- 2.23. To the east of Gloster Road is an existing access into Adastral Park. This gated access opens at the start and end of the working day to allow traffic from Adastral Park employees to enter and exit the site. This vehicular entrance is not an adopted public highway though it does form part of the application site as part of the proposed northern access road.

- 2.24. To the far east of the site, Newbourne Road runs parallel to the site boundary but on the opposite side of a field, residential properties and a commercial site.
- 2.25. The site is surrounded by and includes a wide number of public rights of way as footpaths and bridleways. Starting from the east, five public footpaths lead west into the site from Newbourne Road and Ipswich Road. The southernmost public footpath also leads across Ipswich Road and due south and south east along a footpath and bridleway.
- 2.26. Inside the site, an existing public footpath runs along the entire eastern boundary. The south eastern part is a bridleway and this then routes along the southern boundary heading west. Towards the western end of Ipswich Road this bridleway meets a public footpath which leads north through the site and south, over Ipswich Road towards Newbourne. The northern route through the site runs towards the existing lake and up alongside the eastern boundary fence of Adastral Park. It continues north to Spratts Plantation, around its eastern and northern edge before exiting the site in the far north corner. This then leads north, past the mobile home site and on towards Tesco and old Martlesham.
- 2.27. Picking back up on the southern boundary again, the bridleway continues west to Brightwell Barns before heading along an access road to the south of Sheep Drift Farm, then north between a residential property and Sheep Drift Farm and back into the site. The bridleway then follows the south western boundary to old Felixstowe Road. At this point the bridleway crosses the A12 to the field on its western side following a route west through the middle of the field. This A12 bridleway crossing currently consists of small gap in the central reservation only.

#### *On-site and surrounding Habitats*

- 2.28. Three European designated sites are located within 10km of the site:
- Deben Estuary Special Protection Area (SPA) and Ramsar designated for its wintering birds, invertebrates and plants.
  - Sandlings and Sandlings Forest SPA designated for their heathland habitat and for its ornithological interest.
  - Stour and Orwell Estuaries SPA and Ramsar, designated for its national importance to breeding and wintering birds as well as for the assemblage of vascular plants.
- 2.29. Eleven biological Sites of Special Scientific Interest (SSSIs) are located within 6km of the site boundary. The closest is Ipswich Heaths SSSI which sits approximately 800m from the western site boundary. It is designated for its extensive tracts of heathland / mosaic of heathland and acid grassland and contains the largest colony of silver-studded blue butterfly in East Anglia.
- 2.30. Non-statutory Designated Sites - Fourteen County Wildlife Sites (CWS) are located within 2km of the site boundary including one adjacent to the north-west boundary. Martlesham Soakaway Acid Grassland CWS is a high-quality, acid grassland maintained by rabbit grazing and supports a common lizard population.

- 2.31. Protected and Notable Habitats and Flora - biodiversity Action Plan (BAP) habitats are present on site:
- Open Mosaic Habitat on Previously Developed Land
  - Lowland Mixed Deciduous Woodland
  - Open Standing Water
- 2.32. Further habitats of biodiversity value include the dense and scattered scrub habitats, mature trees and some buildings on site (the last for roosting bats). In addition, seven notable and/or rare plant species are present on site within the open mosaic habitats.

### **3. PROPOSALS**

- 3.1. The application seeks outline planning permission with all matters reserved except access. In that respect the application seeks detailed approval of all vehicular access points and pedestrian and cycle connections into and out of the site. Matters of appearance, landscaping, layout and scale are reserved matters and would be dealt with under future reserved matters applications which would be subject to full consultation with statutory and non-statutory consultees and the local community.
- 3.2. The description of the development includes:
- the erection of up to 2000 homes (including affordable housing)
  - an employment area of c0.6ha (use Class B1)
  - a primary local centre (comprising use Classes A1, A2, A3, A4, A5, B1, C3, D1 and D2)
  - a secondary centre (comprising possible use Classes A1, A3 and A4)
  - a school  
*(as an 'All Through' school with an eventual capacity to provide for 52 early years places, up to 630 primary school places (three forms of entry), 900 secondary school places (four forms entry) and a possible 300 place sixth form)*
  - green infrastructure (including Suitable Accessible Natural Greenspace (SANG), outdoor play areas, sports ground and allotments/community orchards), public footpaths and cycleways,
  - vehicle accesses
  - and, associated infrastructure.

- 3.3. The application is accompanied by the following documents and plans:
- Site Location Plan
  - Design and Access Statement
  - Planning Statement, including Planning Obligations/Heads of Terms
  - Environmental Statement, including parameter plans for:
    - Land use and green infrastructure
    - Building heights
    - Residential density
    - Movement and access
  - Shadow Habitats Regulation Assessment
  - Site Features Plan
  - Phasing Plan
  - Illustrative Framework Masterplan
  - Green Infrastructure Plan
  - Play Approach Plan
  - Main Green Infrastructure Area Plan
  - Heritage Park Plan
  - Character Banding Plan
  - Strategic Landscape Scheme
  - Highways and access drawings
  - Affordable Housing Statement
  - Air Quality Assessment
  - Archaeology Assessment
  - Contaminated Land Assessment and Ground Conditions Assessment
  - Ecological Surveys/Assessments
  - Education Statement
  - Energy Statement
  - Environmental Statement
  - Flood Risk Assessment and Drainage Strategy
  - Geodiversity Survey and Report

- Heritage Statement
  - Land Stability Report
  - Landscape and Visual Impact Assessment
  - Lighting Assessment
  - Noise Assessment
  - Footpath/Cycleway/Bridleway Statement
  - Service Supply Statement
  - Statement of Community Involvement
  - Transport Assessment
  - Travel Plan
  - Tree Survey/Arboricultural Impact Statement
- 3.4. The application predominantly seeks residential development in the form of up to 2000 homes across the majority of the site and the local centre, secondary centre, school, green infrastructure and accesses are all proposed as a result of the 2000 homes and associated population. The proposed employment area is an additional element of the site which is related to it but not directly proposed as a result of the residential development.
- 3.5. This application has been submitted in a location which is identified by Core Strategy Policy SP20 (Eastern Ipswich Plan Area) as the main strategic housing site for residential growth in the District and Eastern Ipswich Plan Area (EIPA). That policy sets out that the planned direction of controlled growth is eastwards of the A12 to the south and east of Adastral Park. Policy SP19 (Settlement Policy) directs 29% of planned growth for the District to the EIPA amounting to 2,320 homes, of which, up to 2000 would be provided to the south and east of Adastral Park.

#### *Masterplan Framework and Parameter Plans*

- 3.6. The application includes a Masterplan Framework and detailed Design and Access Statement to both illustrate proposals and to fix certain strategic elements of the masterplan at outline application stage. In particular, there are parts of the design and access statement framed around the Character Banding Plan which are addressed in greater detail than might normally be provided for an outline application. This includes layouts for the open spaces, local centre, secondary centre and school location and a range of street and site edge sections. It is anticipated that some of these elements would be conditioned on an outline approval so that future reserved matters applications are required to be substantially or broadly in accordance with those plans and details.
- 3.7. The application is accompanied by an Environmental Statement, which includes consideration of matters including landscape impact, heritage impacts and ecological impacts. To assess these matters it has been necessary for the

applicants to set parameters for the development and these are detailed on a number of parameter plans dealing with: land use and green infrastructure; building heights; residential density; and, movement and access. These provide some additional support to the masterplan whilst also setting maximum parameters to enable the maximum potential impact to be assessed in various areas of the Environmental Statement, particularly in relation the landscape impacts. Therefore the building heights parameter plan, in particular, does not set out what is proposed but the greatest heights that could be proposed in various areas.

- 3.8. In addition, the Suitable Alternative Natural Greenspace (SANG) provision is part of the masterplan, which is mitigation proposed through the Environmental Statement and the shadow Habitats Regulation Assessment. Therefore, that is a fundamental element of the parameter plans, masterplan and Design and Access Statement to be secured at outline stage.
- 3.9. The application is also supported by a basic phasing plan. This sets out three phases of development, commencing with approximately 450 homes in the southern area of the site, accessed off Ipswich Road. This phase also includes open space provision and the school site. The second phase would include 550 homes in the western part of the site and the access off the A12. The third phase is proposed for the eastern part of the site, delivering 1000 homes and the access road through the northern part of Adastral Park
- 3.10. The Planning Statement includes a trajectory for the development of the site. This sets out a plan to commence development in 2018, with up to 375 homes occupied by April 2021. Development would then continue at a rate of up to 160 homes per year until final occupations in 2033. This trajectory has informed the Council's five year Housing Land Supply Assessment.

#### *Pedestrian and cycle connections with the existing community and employment*

- 3.11. The site provides a number of opportunities to create pedestrian and cycle connections with Martlesham and beyond to the west. As set out previously, there is the proposal to provide a toucan style crossing on the A12 to enable safe use of the bridleway leading west. This provides an opportunity for an off-road cycling route leading west and it could form part of Suffolk County Council's longer term strategy for an off-road cycling route connecting this site, Martlesham Heath and Kesgrave with Ipswich.
- 3.12. In terms of connections with Martlesham and employment at Adastral Park, the employment area and retail park to the north, there are three connection routes which are being developed in co-operation with the applicants and the County Council. These include; a pedestrian and cycle route leading north from the western edge of the site along Barrack Square and connecting up with existing pedestrian routes and cycle lanes; the new road through the Northern Quadrant, incorporating pedestrian pavements and a cycle lane; and, improvements/upgrading the public footpath leading out of the northern corner of the site, connecting with Betts Avenue leading west and leading north to Tesco and old Martlesham. All three of these routes provide



pedestrian and cycling connections to the existing bridge over the A12. This offers a connection between Martlesham Heath and Kesgrave for existing and proposed residents.

#### *Vehicular Access Points*

- 3.13. The application seeks full approval of four vehicular accesses into the site. These consists of: a new T junction access off the A12 on the western boundary; a new access road leading from Gloster Road through the 'Northern Quadrant' and into the north western boundary of the site; the improvement of the existing quarry access onto Ipswich Road; and, the creation of a new access off Ipswich Road close to Brightwell Barns.
- 3.14. The Ipswich Road accesses would be delivered as part of the first phase of development, enabling the first homes and some infrastructure to be delivered ahead of the substantial highways works required to deliver the A12 and Gloster Road accesses. In the long term these two accesses are proposed to be secondary accesses with the other accesses forming primary routes into and out of the site.
- 3.15. The A12 access on the western boundary would consist of an opening in the existing boundary bund to form a T junction with the A12. This would be the main entrance and gateway into the site. The junction would include traffic light controls to the access and the dual north and south lanes of the A12. Also incorporated within this junction would be a toucan style pedestrian and cyclist crossing for the existing bridleway which crosses the A12. Previously this was also proposed to be used by horse riders, however that aspect of its design has been removed and that it explained later in this report. This access is also proposed to be delivered in the 1<sup>st</sup> phase of development.
- 3.16. The Northern Quadrant road would lead off Gloster Road in the position of the existing vehicular access into Adastral Park. It would lead east along the path of the existing internal road before head south and east again, leading into the development site. The proposed road would be designed to a full adoptable standard with pavements on both sides and a dedicated cycling path. Whilst this road would lead through the existing layout of Adastral Park, the Northern Quadrant area is indicated to have the potential for comprehensive employment development and regeneration. The provision of this road has been promoted as a facilitator for this employment growth.
- 3.17. The A12 access and Northern Quadrant road would link centrally through the site forming a primary access road, referred to as 'the boulevard'. This would provide the main route off which the majority of on-site infrastructure is proposed. It is anticipated that the majority all residential phases would lead off the boulevard. The Design and Access Statement provides a number of street sections and design and place making objectives for this route.

#### *Highway Improvements*

- 3.18. In addition to the vehicular accesses into the site, the Transport Assessment (TA) has modelled the effect of the traffic associated with the 2000 homes and the mitigation measures required on the existing highway network to ensure

that the capacity remains at an acceptable level with a 'less than severe' impact on the highway network upon completion of the development and mitigation. The primary focus of the mitigation is on the A12 and the junctions between the Seven Hills roundabout on the A14 to the south and the Park and Ride Roundabout to the north.

- 3.19. The previously withdrawn Planning Application also sought to deliver mitigation measures along the A12, predominantly in a form of converting roundabouts to crossroads with traffic lights. This application has come to a different conclusion through the up to date traffic modelling in the TA. It proposes to retain all existing roundabouts, with some lane expansion and the addition of traffic lights. A14 Junction 58 (Seven Hills Roundabout) also includes the introduction of traffic lights at some points on the roundabout.
- 3.20. The TA seeks to address the capacity of junctions and journey times and therefore the proposed T junction with traffic lights into the site has also been factored into the effects and mitigation. Furthermore, the proposal looks beyond the A12 at a number of highway improvements required in the immediate area and on routes into Ipswich.

#### *Suitable Alternative Natural Greenspace (SANG)*

- 3.21. The applicants have engaged in pre-application discussions with the Council and have been engaging with the local communities since November 2016. The Suitable Alternative Natural Greenspace (SANG) was the first part of the site layout and masterplan to be fixed by the applicants in the pre-application process. This is a provision of green infrastructure in addition to the formal recreational open space provision. It is specifically provided as mitigation seeking to offer future residents of the site an attractive alternative to the nearby Deben Estuary (which is a Special Protection Area (SPA) and Ramsar site) and to other ecologically sensitive sites for recreation and dog walking. The application is accompanied by a Shadow Habitats Regulation Assessment setting out how this provision is proposed to adequately mitigate impacts on the SPA.
- 3.22. The SANG is proposed in the form of a central greenspace running through the centre of the site from Ipswich Road in the south to the northern edge of Spratts Plantation on the northern boundary. This space is framed around the existing lake and the central public right of way leading north-south through the site. In addition the SANG includes green edges around the boundaries of the site incorporating existing and proposed footpaths and bridleways. These routes would connect a number of green spaces and landscaping areas proposed around the site and would serve as a combination of walking, cycling and running routes of varying distances of up to 7km. A key element of the overall SANG provision is the integration of attractive natural features such as the lake, existing woodland areas and new habitats as well as proposed play equipment for all ages, including an adult 'trim trail'.
- 3.23. The central SANG space would also provide an area for habitat creation and overall the landscaping proposed for this area would be natural and native to

the local landscape. This would therefore include the creation of heathland, woodland and acid grassland which are found in the immediate locality. The habitat provision is also proposed to provide opportunities for ecological mitigation measures proposed through the ecological assessment supporting the application.

### *Education Provision*

- 3.24. Also early into the pre-application process, the applicants sought to determine the amount education provision necessary for this site. The 2000 homes would be expected to generate 200 pre-school children, 500 primary age children, 360 secondary age pupils and 80 post-16 pupils. To address this, the application proposes to provide an 'all-through' school. This would consist of a single school site with eventual capacity to provide for 52 early years places, up to 630 primary school places (three forms of entry) and a 900 secondary school places (four forms entry). In addition a further early years provision would be provided elsewhere on the site, potentially within a community building. The maximum sized school would cost in excess of £35 million, with the development funding over half of that cost and the majority of the first phases of the school.
- 3.25. The school site would be located within a relatively central position on the site facing onto the boulevard and where it could also be accessed off Ipswich Road and delivered as part of the first phase of development. It would be located adjacent to the existing quarry access road which is also proposed to be improved to adoptable highway as a vehicular access road into the comprehensive site.
- 3.26. The school site would cover 5.5 hectares, which the applicants are proposing as appropriate for the number of pupils and size of school. In addition, the school site would be immediately adjacent to the formal recreational open space on its eastern edge. This open space provision would provide the formal sports pitches and formal mown grass green space for the community and it would amount to 7.9 hectares. The application proposes that the spaces associated with the school and recreational open spaces should be shared between the school and wider community use. This would provide the school with access to a total of 13.4 hectares of space for buildings and outdoor play and sports space. It is also anticipated that these combined spaces could provide some form of shared indoor sports facility. At present a sports pavilion with changing rooms is indicated within the recreational open space.

### *The Local Centre, Secondary Centre and employment provision*

- 3.27. A central aspect of the Masterplan is the boulevard main route leading through the site, connecting the two primary access points. The site has a central focus around the SANG and all through school and the proposal seeks to tie these areas together through the creation of a local centre. The application includes an illustrative plan of the layout of this area. This would

include a proportionate amount of local retail, including a convenience store. Overall the site would not provide more than 2,500 sqm of floorspace for A1, A2, A3, A4, A5, B1, C3, D1 and D2 use classes. This local centre provision would be similar to that provided within Martlesham Heath and off Ropes Drive, Kesgrave. The local centre would have a high street layout facing onto the school and it is expected that ground floor retail units would have flats above. The layout is intended to include a public square and café fronting onto the lake and open space at the western end of the local centre. At the eastern end a public car park would be provided and this end would also include a community centre provision.

- 3.28. At the far western end of the local centre, where the boulevard would turn north, a building for D1 use (non-residential institution use) has been proposed. This offers a potential opportunity for on-site healthcare practice/GP surgery.
- 3.29. In addition to the local centre, the proposal includes a small secondary centre towards the western end of the site. This would provide an opportunity for further small scale units for A1, A3, A5 and D2 use classes in a corner cluster fronting onto the boulevard and close to the gateway into the site.
- 3.30. A 0.6 hectare area on the southern boundary of the site is proposed for employment development in the form of B1 business/office units. This would be served directly off the new Ipswich Road access and it would be directly adjacent to an existing area of office/business units at Brightwell Barns.

*Heritage Park, allotments, drainage, and the western highway bund*

- 3.31. In addition to the SANG, the site would provide a further open space in the western part of the site as, what the applicants describe as, a 'Heritage Park'. This would be a 0.78 hectare open space framed by residential blocks surrounding designated and non-designated heritage assets. These include the prehistoric barrow which is a scheduled monument, the WWII pill box on top of it, a further pill box and a brick base of a former radio mast. These would all be retained, protected and restored as part of the open space. The park surrounding these heritage assets would maintain a visual linkage between them and provide some open setting in the context of the residential development. It would also provide a visual link with the BT tower to the north. This space would be tied in with the wider play strategy across the site and the walking/cycling/running routes and would include part of the play equipment provision.
- 3.32. The site also includes a provision of 0.83 hectares of allotments with community orchards in two locations, one area on the southern boundary towards the western end of the site and the other on the eastern boundary.
- 3.33. The application is accompanied by a Flood Risk Assessment which seeks to address flood risks and surface water drainage on the site. The site is not within a flood zone and current information suggests that the site is very permeable, consisting predominately of a sand and gravel strata over lying red crag. This enables the opportunity for direct infiltration to deal with surface

water drainage and large strategic surface water attenuation measures are minimised in the masterplan layout. Where localised drainage measures are proposed these would be integrated into landscaping areas.

- 3.34. The proposed development would introduce homes within 40 metres of the A12 on the western boundary. A landscaped bund currently exists in this location to protect Martlesham Heath from noise and dust from the mineral extraction on the site. With the proposed development, the bund would offer a form of noise attenuation to the properties closest to the A12. This may be in the form of a slightly lower bund and it would also include a form of acoustic fence or wall on top of the bund. Attention is being given to the opportunity to achieve a high quality design and landscaping solution to this prominent edge of the site.

#### *Housing mix*

- 3.35. The application proposes up to 2000 homes across the site and these would include two storey homes, town houses, bungalows and flats. The final proportion of affordable housing and tenure mix has been subject to a viability appraisal and is proposed to be 25% affordable housing (500 homes). This is dealt with in detail later in the report.
- 3.36. The distribution of the affordable housing across the site and amongst the phases should be consistent throughout the development of the site. The specific locations will be influenced in more detail by each reserved matters application. In terms of open market housing, a broad mix of home sizes would be required by policy and would be considered in detail in reserved matters applications.
- 3.37. The site provides opportunities for areas of higher and lower density development and a density parameter plan has been provided to show where higher densities are sought and have been assessed within the Environmental Statement. Similarly, a building heights parameter plan sets out where taller buildings could be provided and that influences the assessment made within the Landscape and Visual Impact Assessment. Higher density areas generally correspond with some of the areas of taller buildings, such as around the Local Centre, along the boulevard and on the A12 edge. Lower densities and lower building heights are proposed in areas where the landscape has greater sensitivity, such as the eastern and southern edges of the site. These parameter plans provide an assessment tool for this outline planning application and detailed assessment of building heights, their form and the urban density of areas would be dealt with in each reserved matters application.

## **4. CONSULTATIONS**

- 4.1. The application process has involved four consultation periods in April, June, September and December covering over 13 weeks in total. Each reconsultation has been advertised accordingly in the East Anglian Daily Times and site notices have been posted around the site boundaries. The relevant and nearby Parish and Town Councils have been consulted along with neighbours of the site. A wide range of statutory and non-statutory consultees have also been consulted and the majority have responded. As the application is accompanied by an Environmental Statement, the Council has also consulted the Secretary of State.

### **STATUTORY CONSULTEES**

#### **Highways England**

- 4.2. It is expected that a final response will be received ahead of the Planning Committee and it will be provided in a late report. Based on advice received so far this is unlikely to raise an objection to the application. Based on the statutory powers of Highways England the application cannot be determined ahead of a response of no objection being received.

#### **SCC Development Contributions Manager Neil McManus**

##### **Provided in full as Appendix 2.**

- 4.3. No objection subject to Education, Library Section 106 contributions. The previously requested waste contribution has now been withdrawn as a request from the response.

#### **Suffolk County Council – Highway Authority**

##### **Final response provided as Appendix 3.**

- 4.4. *Do not objection to the application based on Revision 6 of the Transport Assessment (based on its sensitivity test). The final response states:*

The Adastral Park development site is very large, and it has the potential to significantly increase traffic in the vicinity of the site. The proximity of the site to employment and retail land uses and the strategic highway network are significant factors in assessing the overall transportation impacts of this project. However, it is our overall technical judgement following careful consideration, that if the full mitigation package, as requested by SCC, is realised the residual highways impacts would not be severe. Therefore, on this basis, we would not recommend that SCDC refuses Planning Permission for this development on highways and transportation grounds.

However, should any element of the mitigation package fail to be secured through Planning Condition, agreement and S106 Obligation our position would be that the site cannot fully mitigate its adverse highways and transportation impacts and, given that the residual cumulative transport impacts would be severe, Planning Permission should be refused.



SCC are committed to working with the developers and SCDC in a collaborative way, alongside other stakeholders, to ensure that, if permitted, the site is brought forward as a successful sustainable community.

**Previous October response to TA Revision 5 provided as Appendix 4.**

#### **Suffolk County Archaeological Unit**

- 4.5. As set out in the Environmental Statement submitted with the application, and reflected in the Planning Statement and Design and Access Statement, the proposed development affects a large area that includes designated and non-designated historic monuments and buildings, and below ground archaeological remains.

Above ground remains include prehistoric barrows which are visible as earthworks and are statutorily protected Ancient Monuments, and, also, structures and features relating to the 20<sup>th</sup> century aviation heritage of Martlesham airfield. Scheduled monuments in Spratt's plantation and towards the west of the site (a barrow which has a pill box on it) form part of a complex of prehistoric barrow monuments across Brightwell Heath and around Martlesham (some extant, some excavated, some identified as cropmarks). A survey of 20<sup>th</sup> century airfield structures was carried out for submission with a previous application, and non-designated structures include a further pill box, the octagonal base of a radio tower, and a likely light gun emplacement. The application sets out a commitment to physical preservation of these features (with the exception of the gun emplacement), with a commitment to enhancing public understanding of features through the Heritage Park proposal and associated signage. Development around the barrows, which were formally established in open heathland, will radically alter their setting. SCC Archaeology notes that Historic England have an outstanding objection to the proximity and scale of development in relation to the Scheduled monuments. We would welcome the opportunity to be involved in further discussions on design in relation to considerations of respecting and enhancing the setting of monuments.

With regard to below ground remains, and as summarised in the submitted Desk-Based Assessment (Orion Heritage 2016), the site has been subject to degrees of previous archaeological investigation. Evaluation prior to submission of application C/09/0555 indicated that surviving deposits are relatively sparse, and there have been impacts from 20<sup>th</sup> century military activities and cultivation, but did define areas of interest. For example, these include a Bronze Age pit which is indicative of activity relating to the broader landscape of the prehistoric barrow burials across and beyond the site, and a more extensive area of largely rectilinear enclosures in the northern part of the development that may be part extensive cropmark landscapes and which are likely to be Iron Age/Romano British in date. Ongoing archaeological recording under minerals consent C/10/1441 has further mapped and investigated some of these features. In areas not impacted by quarrying and where evaluation of

background information indicates that there is potential for survival of archaeological remains, development has the potential to impact on below-ground heritage assets. The Desk-Based Assessment reasonably concludes that, as far as can be predicted from current evidence, these remains are likely to be of local/regional interest, significant in contributing to understanding of the wider landscape.

Aside from outstanding issues with regard to built heritage assets, in relation to below ground archaeological remains, there would be no grounds to consider refusal of permission. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of a planning condition or conditions to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions are suggested, although it may be advantageous to tailor conditions to reflect the phasing of development and to reflect areas of the site which can be considered free of archaeological constraint – SCC would welcome the opportunity to discuss condition wording further:

1.No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Strategic Policies SP1 and SP 15 of Suffolk Coastal District Council Core Strategy Development Plan Document (2013) and the National Planning Policy Framework (2012).

**Suffolk County Council - Rights Of Way**

- 4.6. Previous communication has indicated that they have no objection to the application. A final response in relation to Section 106 requests is awaited and will be reported separately.

**Suffolk County Council - Minerals and Waste**

- 4.7. The site has an extensive history of mineral extraction and restoration. Part of the proposed development site is currently subject to a minerals consent granted on 13 September 2011 (application reference C10/1441) with associated ancillary consents.

The Minerals Planning Authority are fully aware of the proposed development, and its interface with the existing mineral extraction. The continued liaison between applicant and extraction operators of the site to ensure that mineral extraction works are phased and completed in alignment with the development phases are welcomed. We understand that any material remaining on site will be utilised within the development.

On the basis of the information provided the Minerals Planning Authority do not wish to raise any objections to the proposed development.

**Suffolk County Council, Flood and Water Management (Lead Local Flood Authority)**

- 4.8. Suffolk County Council, Flood and Water Management can recommend approval of this application subject to conditions:
1. Concurrent with each reserved matters application seeking approval of layout, a surface water drainage scheme shall be submitted to, and approved in writing by the local planning authority for the catchment(s) relevant to that part of the site. The scheme shall be in accordance with the approved FRA (Ref: 10391/FRA/01 Rev. 4 & Technical Note dated 14<sup>th</sup> July 2017, Ref: 10391 TN30 Rv1) and include:
    - a) Dimensioned plans and drawings of the surface water drainage scheme;

- b) Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
- c) If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to  $Q_{bar}$  or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
- d) Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
- e) Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
- f) Topographical plans depicting all exceedance flow paths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
- g) Details of who will maintain each element of the surface water system for the lifetime of the development.

The scheme shall be fully implemented as approved.

*Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.*

2. Concurrent with each reserved matters application seeking approval of layout details of the implementation, maintenance and management of the surface water drainage scheme for the catchment(s) relevant to that part of the site shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

*Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.*

## Natural England

- 4.9. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

### SUMMARY OF NATURAL ENGLAND'S ADVICE

#### NO OBJECTION

Our previous consultation response (11 May 2017 ref: 213665) advised that Natural England had no objection to this application subject to appropriate mitigation being secured. We asked for the various identified mitigation measures to be drawn together into an Environmental Action Plan (EAP), and for further detail to be provided on a number of points.

Since that time, a further revised EAP has been produced. Natural England is satisfied that this now provides sufficient detail to conclude that the development *is not likely to have an adverse effect on any designated Natura 2000 Site, alone, or in combination with any other plan or project, and is not likely to cause damage to any Site of Special Scientific Interest.*

We advise that an appropriate planning condition or obligation is attached to any planning permission to secure the measures detailed in the Environmental Action Plan.

#### Further advice on mitigation

##### Recreational Disturbance

There is potential for housing developments to result in increased recreational disturbance to birds on designated sites, particularly due to recreational dog walking. This issue is addressed in the SCDC core strategy appropriate assessment (2013), and has since been further explored through the Recreational Disturbance Avoidance and Mitigation (RAMS) project by SCDC and neighbouring local authorities.

For this development, potential impacts will be mitigated through a combination of Green infrastructure associated with the development, and a proportionate financial contribution to the district wide RAMS project. The green Infrastructure area is of a significant size (25ha), and is designed to a high quality standard, with appropriate provisions for dog walking including a variety

of walking routes, signage and promotion, dog bins and off-lead areas. Monitoring is also planned, and the development will be phased to ensure that it is in place as houses become occupied.

The developer has also committed to make a proportionate financial contribution to the developing recreational disturbance and avoidance project, which is designed to address district wide issues through direct measures on designated sites.

Natural England advises that with this combination of development based green infrastructure, and contributions to district wide measures, the

proposal is not likely to have an adverse effect in terms of recreational disturbance, either alone and in combination with other site allocations.

#### SANG Criteria

The area of Green Infrastructure (GI) to be created as part of the development (based on predicted occupancy rates) is less than the guideline figure of 8 ha per 1000 people of Suitable Accessible Natural Green Space' (SANG) quoted in the Environmental Action Plan. This figure is a guideline rather than an absolute measure. It is Natural England's advice that from the information provided with the application, a significant area of high quality green infrastructure, incorporating a range of wildlife habitats and recreational opportunities will be provided.

In terms of mitigating impacts on designated nature conservation sites, it is the combination of Green Infrastructure plus contributions towards site specific measures on designated sites site specific measures (The RAMS project) which Natural England advises is sufficient to avoid any adverse effect on designated sites.

#### Waldringfield Pit Geological Site of Scientific Interest

It is Natural England's advice that provided the provisions of the Environmental Action Plan are adhered to, then the proposal is not likely to damage the Waldringfield Pit SSSI.

### **Sport England**

4.10. Sport England does not wish to raise an objection to this application as it considers that the scheme can broadly meet the requirement for outdoor/indoor sports provision, as set out in the planning statement and accompanying plans. The facility provision outlined therefore broadly meets Planning Policy 3 of our planning objectives, in that the proposals put forward facilities for sport and recreation that meet policy requirements and the demand generated from a development of this scale. The absence of an objection is subject to the conditions being attached to the decision notice should the local planning authority be minded to approve the application, covering the following areas:

1. The development of a sports facilities strategy to set out quantitative, qualitative and spatial distribution of sports facilities within the development, including the phasing of facility provision and the approach to management of the facilities, including dual use of facilities on the secondary school site
2. The development of a community use agreement to set out the details of community access to sports facilities, including hours of use, pricing policy, management arrangements, monitoring and review etc.
3. Detailed site survey and specifications for the provision of natural turf pitches on the site, to meet Sport England/NGB performance quality standards.



## Environment Agency

### 4.11. Foul Water Sewage and Storm Water Drainage

We agree with the assessment of foul water infrastructure and capacity for this development and concur that Woodbridge Farm Water Recycling Centre has sufficient capacity for this development at present.

#### Non-technical summary

With regard to section 14.4, we expect the applicant to provide details on how construction waste will be managed and how they intend to comply with the waste hierarchy which is a legal requirement. Waste minimisation with an aspiration for zero waste to landfill should be planned for as part of a waste and resource efficiency initiative within the construction phases.

#### Groundwater

**Environment Agency position** We consider that planning permission could be granted to the proposed development as submitted if the following planning conditions are included as set out below. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application. We ask to be consulted on the details submitted for approval to your Authority to discharge these conditions and on any subsequent amendments/alterations.

**Environmental setting** This site is located above Secondary A and Principal aquifers. The application overlies WFD groundwater body, and is also in a WFD drinking water protected area and is close to a watercourse and waterbodies. The site is considered to be of high environmental sensitivity. The historic and future use could present potential pollutant linkages to controlled waters. Consideration for the risk posed by surface water drainage and foundations will also need to be undertaken.

**Condition 1** Prior to each phase of development approved by this planning permission no development / No development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority: 1) A preliminary risk assessment which has identified: all previous uses potential contaminants associated with those uses a conceptual model of the site indicating sources, pathways and receptors potentially unacceptable risks arising from contamination at the site. 2) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. 3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. 4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for

longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Advice to LPA This condition has been recommended as we are satisfied that there are generic remedial options available to deal with the risks to controlled waters posed by contamination at this site. However, further details will be required in order to ensure that risks are appropriately addressed prior to development commencing. The Local Planning Authority must decide whether to obtain such information prior to determining the application or as a condition of the permission. Should the Local Planning Authority decide to obtain the necessary information under condition we would request that this condition be applied.

Condition 2 No occupation of any part of the permitted development / of each phase of development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Condition 3 No development should take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority, shall be submitted to and approved in writing by the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Condition 4 If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Condition 5 No drainage systems for the infiltration of surface water drainage into the ground is permitted other than with the express written consent of the

local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reasons To protect and prevent the pollution of controlled waters (particularly the Secondary A and Principal aquifers nearby watercourses and water features and EU Water Framework Directive Drinking Water Protected Area) in line with National Planning Policy Framework (NPPF; paragraphs 109, 121), EU Water Framework Directive,

Anglian River Basin Management Plan and Environment Agency Groundwater Protection Position Statements (2017) G1, G9 to G13, N7 and N10. The water environment is potentially vulnerable and there is an increased potential for pollution from inappropriately located and/or designed infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins.

Condition 6 Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reasons Piling or other penetrative ground improvement methods can increase the risk to the water environment by introducing preferential pathways for the movement of contamination into the underlying aquifer and/or impacting surface water quality. For development involving piling or other penetrative ground improvement methods on a site potentially affected by contamination or where groundwater is present at a shallow depth, a suitable Foundation Works Risk Assessment based on the results of the site investigation and any remediation should be undertaken. This assessment should underpin the choice of founding technique and any mitigation measures employed, to ensure the process does not cause, or create preferential pathways for, the movement of contamination into the underlying aquifer, or impacting surface water quality.

Underground Liquid Storage Tanks All underground storage tanks and their associated pipework must be removed and the ground in their vicinity inspected for contamination.

#### Pollution Prevention and Control

The lake currently within the quarried area of the site is, we understand, groundwater fed and therefore in continuity with the groundwater. It is therefore necessary to consider pollution prevention structures in advance of using this water body for surface water drainage attenuation.

Condition: No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority in consultation with the Environment Agency, which may be given

for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters.

Reason:

To ensure a satisfactory method of pollution control.

Condition:

No development approved by this permission shall be commenced until a scheme for the provision and implementation of the method of working has been approved by the Local Planning Authority. Development shall then only proceed in line with the agreed scheme.

Reason:

To prevent pollution of the water environment.

**Construction Phase** There shall be no discharge of surface water contaminated with sediment to any watercourse (particularly with reference to the construction phase of the development). If such a discharge is envisaged, the site operator should contact the Environment Agency beforehand. Where dewatering is required, the resultant water should not be disposed of via any ground surface, drain or watercourse without prior approval from the relevant regulatory body (Environment Agency, IDB or water company) as this activity may require a discharge consent. The site developer should ensure that adequate protection is afforded to bulk storage of fuel on site to prevent damage from demolition activities or vehicle movements, and to guard against vandalism. Where relevant, oil storage should comply with The Control of Pollution (Oil Storage) (England) Regulations 2001.

Only uncontaminated inert materials should be used for restoration and infill.

**Post-construction Phase** Installation of an interceptor in circumstances where there is a risk of oil contamination is in line with Agency best practice, although you should be aware that this facility may not guarantee 100% removal of oil from contaminated surface water. The responsibility for the maintenance of any oil interceptors/sediment chambers in the surface water drainage system should be assigned before occupancy begins.

**Invasive Non-Native Species Japanese Knotweed (*Fallopia japonica*)** – The presence of Japanese Knotweed has been duly noted in the application. A 2 year programme of monitoring following the removal of *F. japonica* is noted in Table 13.1 of the Non-Technical Summary and discussed in ES 8.6.36. The applicant's approach would be acceptable, providing that there is a management plan in place, and that the measures outlined in the above sections of the application are adhered to as part of any plan. We recommend the following condition is appended to any planning permission granted.

**Condition:** Prior to the commencement of development, a detailed method statement for the removal or long-term management /eradication of Japanese Knotweed on the site shall be submitted to and approved in writing by the local planning authority. The method statement shall include proposed measures to prevent the spread of Japanese Knotweed during any operations

such as mowing, strimming or soil movement. It shall also contain measures to ensure that any soils brought to the site are free of the seeds / root / stem of any invasive plant covered under the Wildlife and Countryside Act 1981. Development shall proceed in accordance with the approved method statement. Reason: Japanese Knotweed is an invasive plant, the spread of which is prohibited under the Wildlife and Countryside Act 1981. Without measures to prevent its spread as a result of the development there would be the risk of an offence being committed and avoidable harm to the environment occurring.

#### Water resources

The Water Resources team at the Environment Agency will need to be contacted in the following two instances if they occur: 1. if dewatering occurs in quantities exceeding 20 cubic metres per day during the engineering and construction phase, an abstraction licence will be required. 2. If the current abstraction licences are to be used to supply non-potable water or any other purpose not stated on the licence, they need to be varied to reflect the new purpose.

### Historic England

- 4.12. Thank you for your letter of 12 April 2017 offering the opportunity for us to provide further comment on this important outline application for a development of up to 2000 dwellings on land to the south and east of Adastral Park.

We again note the letter from Montagu Evans dated 22<sup>nd</sup> March 2017 which forms an appendix (2) to the revised framework plan and the revised layout drawing for the 'heritage park'. Please also note our previous correspondence in relation to the scheme and this letter.

As we have discussed the development area contains a number of significant designated and non-designated heritage assets, including a group of prehistoric bowl barrows which were part of an extensive prehistoric landscape that existed in the Martlesham area. These upstanding prehistoric monuments are a remarkable survival from this period, and a number of these barrows are designated as Scheduled Monuments (SM). The high significance of the barrows and their relationship to the landscape has been explored in the heritage statement, and confirmed in previous correspondence. The non-designated heritage assets which are of interest to this application include buildings and structures that were associated with communication systems and defence of the Martlesham airfield in WWII. These structures comprise a good consistent group of assets with a high degree of significance. It has also been agreed that these are worthy of preservation and retention within the development area. Other multi-period settlement evidence is known from within the development area which will need to be subject to further assessment, and this has also been discussed elsewhere.

The primary concern for us is therefore the barrow to the south of Adastral Park with its associated Pill Box, as well as the other non-designated WWII

features that are associated with it. The barrow is the most vulnerable of the monuments associated with this development and the development would represent a huge change to its setting. Without sufficient consideration and mitigation the development has the potential to have a serious detrimental impact upon the significance of the barrow and the WWII features through a development in their setting. This represents harm of a high magnitude. We also continue to raise a concern about the potentially detrimental impact of development on the significance of the barrows in Spratt's Plantation, which is in at the northern end of the site.

The National Planning Policy Framework identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7 and 14). The core planning principles of the NPPF are observed in paragraphs 14 and 17 which propose a presumption in favour of sustainable development, which includes the need to 'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life for this and future generations' (paragraph 17). Paragraph 131 says that when determining planning applications, account should be taken of 'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation' and, 'the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality. The NPPF paragraph 132 requires planning authorities to place 'great weight' on the conservation of designated heritage assets, and states that the more important the asset the greater the weight should be. It also recognises that significance can be harmed by development within the setting of an asset. This paragraph also states that 'any harm or loss should require clear and convincing justification'. It is also recognised in the NPPF (paragraph 134) that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. The NPPF (Paragraph 137) highlights the opportunity for Local planning authorities to look for new development within the setting of heritage assets that will enhance or better reveal their significance. Proposals that therefore preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably. 141 makes provision for developers 'to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact', and in relation to this, Paragraph 139 says that 'non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets. Any significance archaeology found in this area associated with the scheduled monument would need to be considered to determine whether it would meet these criteria.

As discussed, our primary concern is the barrow to the south of Adastral Park with its associated Pill Box, and the other non-designated WWII features that

area associated with it. The applicant has proposed that these features will form the centre of a heritage park, which would provide open space around the barrow and would allow views and inter-visibility between the WWII assets. We have accepted the broad principle of the heritage park; and recognise that this represents an opportunity to preserve and interpreted these assets in-situ. This approach is of considerable importance and merit. We also recognise that the design and layout of this area on the masterplan has been amended in light of our previous comments. This has improved the connectivity and relationship between the individual WWII assets and with Adastral Park to the north. This is indicated in the letter from Montague Evans and in the revised plans.

Whilst we appreciate that changes have been made to the layout of housing to improve the situation of the WWII assets and we are very much aware that this is an outline application (as the Montague Evans Letter reminds us). We do not however feel that there has been sufficient weight or regard given to the special interest of the designated barrows and non-designated heritage assets. In our view the plan and the changes that have been made do not yet provided the level and degree of comfort or enhancement that we feel it needs or the level of confidence to allow this suggested approach to be accepted.

Primarily it is the scale, size and density of the development and the closeness of two block of housing to the barrow. Particularly the buffer as suggested in the layout plans is insufficient. There are also other issues that we have identified that need to be clarified and revised, prior to the outline application being accepted. Further work is still therefore required to satisfy our concerns. These are set out below.

#### Density

As discussed in our previous letters the outline application would see the scheduled monument and non-designated heritage assets surrounded by development which as indicated on the layout plans is the highest residential density of development (up to 50 DPH) and the highest building heights (up to 4 storeys or +16 m) as shown on Parameter Plan 2 (Building Heights) and Parameter Plan 3 (Residential Density). We feel this is in appropriate for this area of the development and consider that this density of housing would overly dominate the setting of the barrow. Whilst we accept development within the setting of the barrow as part of the scheme we would want this to be of a modest scale and density. There is plenty of scope within the layout plan to place higher density houses elsewhere in the scheme. This needs to be addressed.

#### Buffer zone to the designated barrow

We note that the applicant responded to our previous comments with the Montague Evans letter. Unfortunately this approach has not been entirely helpful in providing the reassurance or clarity that is needed. Again it is worth reiterating that we fundamentally disagree with the statement in that letter that says that the buffer zones as show on the plan '*are appropriate for this site and sufficient to preserve the special interest of the heritage assets*'. This is not the case, and no evidence, policy or guidance is provided to back up this

claim. The statement has clearly not been fully thought through. We also consider that it is based on a flawed judgment and assessment of significance and harm. A development of tall houses 15m from a barrow that once stood in open heath would clearly result in a massive change to its context and therefore would be harmful to its significance. This statement does nothing to alleviate our concerns or provide a solution to this issue in relation to the NPPF policy set out in paragraph 137. In our view, the application would therefore fail this policy. As discussed, we consider further changes are therefore necessary to the layout before the outline application can be accepted. This is to ensure that the historic environment features are successfully accommodated within the layouts without causing unnecessary and avoidable harm

As discussed we would like to see increases in the size of the buffer for the barrow in the heritage park, specifically to move back the house frontages from the housing blocks that sit immediately to the north-west and south-west back and an increase the buffer on this side of the monument so that the monument has a consistent wide buffer on all sides. We would also want to see the height of the buildings in the vicinity of the heritage park reduced to no more than 2 storeys and a maximum density of 20-30 DPH.

#### Layout design

We also note Point 8 on the heritage park plan mentions roads on the perimeter of the open space. We have been clear that these roads would need to be removed entirely from this space and these housing blocks approached from the rear, with only pedestrian access only to the front. Although we want the houses to face this space, there should be as little visual impact to the front, which requires the removal of cars, roads, bins street furniture and other clutter. This may require the use of parking courts at the back and means the properties will need to have rear access. This principle needs to be secured in some way and point 8 needs to be revised.

#### Designated barrows in Spratt's Plantation

We also note that no mention is also made about the setting of the barrows in Spratt's plantation. We accept that these sites are in woodland; however we continue to raise a concern about the impact on the development on the barrows in Spratt's Plantation. From the previous plans we understand that the development would also be within approximately 10 m of these barrows. We would like to see the buffer between the barrow and the development increase and would like to see specific reference to a programme of enhanced management for these barrows; this would need to include scrub clearance and interpretation.

#### Post-consent

We also seek assurances from the Council about how the mitigation and design and layout principles would be safeguarded once consent is granted, through the establishment of suitable conditions and following their discharge. We would also want to see specific reference to, or receive assurances from the council that securing improved management and interpretation for the



heritage assets (designated and non-designated) will be made a part of the conditions or that there will be sufficient heritage offer in the s.106 or CIL agreement to cover these points. This is to ensure confidence that the proposal will deliver the mitigation and will have sufficient safeguards.

We are aware that this is an outline application, but in policy terms we consider that the application fails to provide a sufficient level of confidence to allow the approach to the historic environment to be acceptable, and to ensure that sufficient mitigation is secured to off-set the harm, as set out in the NPPF. We support the adoption of an approach to the barrow that would see it and the non-designated WWII assets incorporated into a green space allocation, and consider that a number of simple changes would reduce the harm to the significance of the designated and non-designated assets. This includes increasing the size of the buffer for barrow to the south of Adastral Park, changing the density of the housing and agreement of design principles for the approach to the heritage park. We have also made some simple suggestions for improving the situation for the designated barrows in Spratt's Plantation.

At present however without these changes we consider that the application the policies of NPPF in a number of critical areas, in particular we have identified that the application would be harmful under paragraph 132 and that in our view the applicant has not made sufficient changes to the design or presented a clear justification for the harm under the terms of 134. The applicant has not fully considered the implications of paragraph 137, and therefore the application also fails that policy. The application does not therefore qualify as sustainable under main planning principles of the NPPF (see paragraphs 14 and 17).

We therefore consider that the revisions are necessary to reduce the harm and further information is still needed with regards to how the management benefit of the non-designated heritage assets can be secured during and after the development. We would be happy to discuss these issues further in order to agree a way forward in relation to the points raise above, however we are not at present able to support the scheme.

#### Recommendation

Historic England therefore objects to the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 132, 134, 137 and 139 of the NPPF. Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

## NHS England

4.13. I refer to the above planning application and advise that, further to a review of the applicants' submission the following comments are with regard to the primary healthcare provision on behalf of NHS England Midlands and East (East) (NHS England), incorporating Ipswich & East Suffolk Clinical Commissioning Group (CCG).

The proposed development is likely to have an impact on the services of 2 GP practices operating within the vicinity of the application site. The GP practices do not have capacity for the additional growth resulting from this development and cumulative development growth in the area.

The proposed development will be likely to have an impact on the NHS funding for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated.

The planning application does not appear to include a Health Impact Assessment or propose any mitigation of the healthcare impacts arising from the proposed development.

NHS England notes that the planning application includes proposed D1 class use. However, it must be made clear that at the present time there is no agreement in place between the applicant and NHS England, that this new proposed health facility will be utilised by an NHS England funded GP Practice. Please note any project proposed by the GP Practice is subject to CCG agreement and NHS England prioritisation and approval processes.

A Healthcare Impact Assessment (HIA) has been prepared by NHS England to provide the basis for a developer contribution towards capital funding to increase capacity within the GP Catchment Area.

The existing GP practices do not have capacity to accommodate the additional growth from the proposed development. The development could generate approximately 4,600 residents and subsequently increase demand upon existing constrained services. The primary healthcare service directly impacted by the proposed development and the current capacity position is shown in Table 1.

**Table 1: Summary position for primary healthcare services within 2km catchment (or closest to) the proposed development**

Premises	Weighted List Size <sup>1</sup>	NIA (m <sup>2</sup> ) <sup>2</sup>	Capacity <sup>3</sup>	Spare Capacity (NIA m <sup>2</sup> ) <sup>4</sup>
Martlesham Heath Surgery	5,637	286.36	4,176	-100.18
Birches medical centre	7,025	359.70	5,246	-122.01
<b>Total</b>	<b>12,662</b>	<b>646.06</b>	<b>9,422</b>	<b>-222.19</b>

The development would have an impact on primary healthcare provision in the area and its implications, if unmitigated, would be unsustainable. The proposed development must therefore, in order to be considered under the 'presumption in favour of sustainable development' advocated in the National Planning Policy Framework, provide appropriate levels of mitigation.

The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.

The development would give rise to a need for improvements to capacity, in line with emerging CCG estates strategy, by way of extension, refurbishment, reconfiguration or potential relocation at one or both of the existing practices; a proportion of the cost of which would need to be met by the developer.

NHS England and the CCG therefore request ongoing engagement with the developers and the Council to agree suitable mitigation, to allow the planning of any infrastructure to be as flexible as possible. Significant work is needed to develop requirements over the timeline of this major development and the planned housing trajectory, once established, will feed into this.

**Table 2: Capital Cost calculation of additional primary healthcare services arising from the development proposal**

Premises	Additional Population Growth (2000 dwellings) <sup>5</sup>	Additional floorspace required to meet growth (m <sup>2</sup> ) <sup>□</sup>	Spare Capacity (NIA) <sup>□</sup>	Capital required to create additional floor space (£) <sup>□</sup>
Martlesham Heath Surgery	2,300	157.71	-100.18	362,733
Birches medical centre	2,300	157.71	-122.01	362,733
<b>Total</b>	<b>4,600</b>	<b>315.42</b>	<b>-222.19</b>	<b>£725,466</b>

A developer contribution will be required to mitigate the impacts of this proposal. NHS England calculates the level of contribution required, in this instance to be £725,466.

In line with Suffolk Coastal District Council CIL Regulation 123 list, the proposed development is considered large scale major development not liable for CIL; NHS England therefore requests that this sum be secured through a planning obligation linked to any grant of planning permission, in the form of a Section 106 planning obligation. Suitable payment triggers to be agreed as part of the Section 106 agreement negotiations.

### Conclusions

In its capacity as the primary healthcare commissioner, NHS England has identified that development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development. The capital required through developer contribution would form a proportion of

the required funding for the provision of capacity to absorb the patient growth generated by this development. Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.

The terms set out above are those that NHS England deem appropriate having regard to the formulated needs arising from the development. NHS England is satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF.

NHS England and the CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

## **Anglian Water**

### **4.14. Assets Affected**

There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted. *“Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.”*

#### **Wastewater Treatment**

The foul drainage from this development is in the catchment of Woodbridge Creek Water Recycling Centre that will have available capacity for these flows.

#### **Foul Sewerage Network**

Development will lead to an unacceptable risk of flooding downstream. However a development impact assessment has been prepared in consultation with Anglian Water to determine a feasible mitigation solution.

We will request a condition requiring compliance with the agreed drainage strategy.

#### **Surface Water Disposal**

From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse.

Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

#### Trade Effluent

The planning application includes employment/commercial use. To discharge trade effluent from trade premises to a public sewer vested in Anglian Water requires our consent. It is an offence under section 118 of the Water Industry Act 1991 to discharge trade effluent to sewer without consent. Anglian Water would ask that the following text be included within your Notice should permission be granted. *“An application to discharge trade effluent must be made to Anglian Water and must have been obtained before any discharge of trade effluent can be made to the public sewer. Anglian Water recommends that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of such facilities could result in pollution of the local watercourse and may constitute an offence. Anglian Water also recommends the installation of a properly maintained fat traps on all catering establishments. Failure to do so may result in this and other properties suffering blocked drains, sewage flooding and consequential environmental and amenity impact and may also constitute an offence under section 111 of the Water Industry Act 1991.”*

#### Suggested Planning Conditions

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval.

#### Foul Sewerage Network

##### CONDITION

*No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority. REASON To prevent environmental and amenity problems arising from flooding.*

## **Secretary of State for Communities and Local Government**

- 4.15. I acknowledge receipt of the environmental statement relating to the above proposal. I confirm that we have no comments to make on the environmental statement.

## **NON-STATUTORY CONSULTEES**

### **Suffolk Fire and Rescue Service**

- 4.16. Advises that it is critical that access meets Building Regulations Approved Document B (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. Suffolk Fire and Rescue also requires a minimum carrying capacity for hard standing of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations Approved Document B (Fire Safety), 2006 Edition. Suffolk Fire and Rescue recommends the installation of fire hydrants, but cannot stipulate exact numbers at this stage. This will be determined at the water planning stage. Suffolk Fire and Rescue recommends due consideration is given to automated-fire sprinkler system installation. If the Planning Authority is minded to grant approval, the Fire Authority will request that adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.

### **Suffolk Preservation Society**

4.17. *Introduction*

Thank you for inviting the Society to comment on the above application for 2000 houses on an allocated site at Martlesham. This is the largest housing development in the district and presents the both challenges and opportunities for Suffolk Coastal to deliver a scheme of the highest standards of design and environmental quality. Accordingly, the Society has commissioned professional urban design advice to review the scheme and provide commentary and analysis of the outline application. The following comments are made in the light of the expert opinion provided by Mr Peter Dawson, Manager of the Built Environment, Essex Place Services, a leading provider of integrated environmental assessment, planning, design and management services.

*Analysis of the proposals*

Chapter 5 of the DAS sets out the general approach to plot layouts (predominantly) at edge and character bands areas as well as concepts for public space design and cross-sections for streets and interface zones. The principles outlined in this section, along with the illustrative masterplan and vignettes outlining spatial arrangement concepts are sound and supported at this level. The applicant taking this through to full planning should take the

DAS as a good starting point with a strong set of design principles which should be strictly adhered to in order to ensure a high quality, well designed development. In the absence of specific design guidance, Policy SP15 of the Suffolk Coastal District Local Plan and Core Strategy and Development Management Policies (2013) should be applied. Good precedent images have been provided within the DAS and this level of quality should be taken forward. Design codes will be essential for articulating the sense of place and identity of the development, and design styles contained within the codes should be to the highest possible standard in line with a modern interpretation of the traditional Suffolk vernacular.

The Character area banding shown is positive as it outlines the key areas within the wider development which will be responsible for integrating both character and place making into the site. The next step should define the distinct character areas within the bulk of the residential elements of the site, along with the specific elements of design which makes them character areas in their own right. This will include detailing of material types, architectural styles, standard block, and plot and housing typologies.

Active streets are essential in housing design, and once block and plot layouts have been established, it will be important to understand how active frontages work throughout the development. Plans should be provided showing the how active frontages will work across the development, particularly at ambiguous areas such as corners, areas fronting or backing onto green space and interfaces between land uses.

The primary vehicular accesses to site have been designed in accordance with DMRB to accommodate the expected traffic safely. There is a requirement for all other internal streets to be of a human scale which gives priority to non-motorised modes (eg. Manual for Streets). Sensitive and context appropriate application to highway design to the internal streets will be essential for the creation of attractive spaces.

The illustrative masterplan shows the primary pedestrian, vehicular and equestrian routes and connections from the site to the wider area. The A12 forms a significant barrier to the west of the site, and it appears that connections over the road / to Martlesham Heath are poor. It should be investigated whether there is potential for crossings beyond the primary access junction's pedestrian crossings at a more suitable location for pedestrian access over the A12. The potential for a green bridge could be considered given the scale of the development.

Development phasing and how the three phases relate to each other is particularly important given Phase 1 is at the centre of the site. The interface between the built phases and the surroundings in the short/medium term will need much consideration to ensure that design remains paramount as the development progresses.

Treatment of the development frontage onto the A12 should be planned correctly. The way that the noise attenuation features and the green corridor are designed will be crucial to ensure that not only the impact of noise and pollution from the A12 is mitigated, but that the site has a welcoming

frontage, and that sufficient width and density of planting is provided to create an attractive aspect for housing fronting onto it from inside the development.

Thought must be given to the way that development plots and individual houses relate to each other, which will be particularly important at areas such as the 'Austral Business Park Edge' where properties are proposed to change between inward facing to the development to outward towards green space.

The location of the both local centres is considered appropriate. A more detailed breakdown showing the mix of land uses for each phase of the development, building upon the overall block plan as per Parameter Plan 1, would be required to understand the relationship between the use class and quantum.

The proposals show building heights ranging from 2 and 3 storeys, with occasional 4 storey buildings at key locations where they will act as landmarks. Whilst this approach is reasonable it will be necessary to see where the proposed 4 storey buildings are to be located. As building heights only increase in 0.5 or 1 storey intervals (or up to 10-15 dph) between 'bands' as per Parameter Plan 2, it is essential to understand how, given the lack of gradual grading of height as would be seen in developments with a greater differential between heights/density, buildings in adjoining bands will interface with each other. Massing plans will be required to show how this relationship will work effectively across the site.

The DAS provides some good quality conceptual public space designs across the development, particularly at the local centres and other key and nodal areas of public realm. Design codes for the treatment of public spaces in line with the principles set out in the DAS should be produced which builds upon the work undertaken to date and ensure a high quality finish.

A good indication of the primary highway network is provided within the parameter plans. A plan representing street hierarchy broken down by phase with typical typology for the design of the 'family' of streets should be included at the next stage. Details on treatment to parking bays within each of street types should be provided which should include options and variations in parking bay orientation, inter-planting and design.

The development site includes some highly sensitive edges and boundaries, particularly into the AONB and open rural landscapes to the south. Some positive cross-sections have been provided in the DAS which show the potential for the creation of a set of landscaped buffers to development edges. In the next stage, these principles should be built upon, with scaled landscape plans and diagrammatic information provided. The interface between development frontage and these landscapes is of upmost importance and careful consideration should be given to these treatments on a plot by plot basis as opposed to an overarching strategy which does not take into account of distinct differences between plots. The same principles should be applied to the 'Suitable Alternative Natural Greenspaces' (SANG) and how traffic calmed streets interact with these new green spaces.



At present SUDS and water attenuation concepts have not been included within the DAS. These methods of managing water run off should be integrated into the design of public space as part of the next stage of design. This will be particularly important in lower lying areas or locations where topography dictates, eg. Valley corridor.

A strategy for play, based upon the principles outlined in the DAS should be included in the next design stage. This should include more information on suggested locations for play – both formal and informal, in terms of the quality and the quantity, which should be in accordance with the maximum distances outlined in the DAS.

The site contains some important heritage assets and steps have been taken to integrate them sympathetically into the design for the site. This is welcomed, and further design for these sites, particularly where they fall inside a new park space (eg. The WWII Pillbox) should be undertaken with efforts made to reduce visual intrusion and impact to their settings.

### *Conclusion*

In summary, the Outline application includes some very interesting and innovative precedent work which we would expect to be continued by the Developer as part of the full application. The expected standard of design should be high and of outstanding quality, integrating a large scale new community with retail and educational facilities with enhanced green spaces and natural landscapes in accordance with the principles outlined in the supporting DAS.

## **Suffolk Wildlife Trust**

### **4.18. *Avoidance of Impacts on Statutory Designated Sites***

In our consultation response of 19th May 2017 we queried the calculation used to assess the amount of onsite public greenspace (SANG) required as part of the development. We note that the additional information provided does not provide any further comment on this matter.

The additional information does include a proposed phasing plan for the delivery of the SANG and other onsite green space. Whilst this is welcomed, we recommend that it is ensured that the delivery of these areas accords with the proposed delivery of the residential phases of the development to ensure that the necessary green space is available to new residents immediately on occupation of any dwellings.

We also note that a per dwelling financial contribution towards the emerging Recreational Disturbance Avoidance Mitigation Strategy (RAMS) has been secured. We support this measure as part of the wider RAMS work.

### *Environmental Action Plan – Part 1*

We note the contents of part 1 of the Environmental Action Plan, which sets out a qualitative assessment of the proposed SANG along with details of the phasing for its provision. Whilst the information provided appears to

demonstrate that the proposed provision is intended to be of high quality, the amount to be provided may not be sufficient to retain all of the species (particularly breeding birds) currently recorded on site after development is completed. It is therefore important that sufficient long-term monitoring is undertaken to ensure that the proposed management measures are sufficient in retaining key species onsite. If they prove to be insufficient a mechanism must be in place to allow them to be altered to correct any issues.

### **Royal Society For The Protection Of Birds (RSPB)**

4.19. Thank you for consulting the RSPB regarding the additional information supporting the development proposal at land to the south and east of Adastral Park, Martlesham Heath. We are pleased to provide the following comments.

#### *Comments on measures proposed to mitigate increases in recreational pressure on European sites*

These comments relate to measures proposed to mitigate the impacts of increased recreational pressure resulting from the development on nearby internationally designated sites, including the Deben Estuary SPA and Ramsar site, the Stour and Orwell SPA and Ramsar site, and the Sandlings SPA.

#### *1) SANG provision*

Our comments regarding the parameters used in the calculation of the requirement for SANG (Suitable Accessible Natural Greenspace), as outlined in the Shadow HRA, have not been addressed and therefore still apply. In brief, we still consider that the proposed provision of 25.12ha is below the recommended amount given the scale of the development – please see our comments of 19th May for full details.

The Shadow HRA calculates the requirement for SANG using three parameters:

- the SANG requirement - 8ha per 1000 people
- the number of dwellings – 2000
- the occupation rate per dwelling – 1.57

Para. 162 of the Shadow HRA explains that the occupation rate represents the number of 'new' occupants per dwelling, meaning that it represents only those people new to the District, and does not include people who were already resident within the District. It therefore does not represent the number of people likely to live in each household. In justification, it is stated that this figure was used 'as the basis for the HRA of the Suffolk Coastal Core Strategy'. Whilst this may be the case for the assessment of the impact of the total increase in population across the District on all the relevant European sites, this was not a method proposed for assessment of individual developments on specific European sites or the calculation of SANG requirements.

The Appropriate Assessment of Suffolk Coastal District Council Core Strategy and Development Management Policies ('the AA of the Core Strategy') distinguishes between the District-wide impacts of day trips to European sites by new residents within the District as a whole, who may be prepared to travel substantial distances, and those of 'local greenspace users' who use European sites close to their homes for general recreation. The figure of 1.57 new occupants per dwelling is used in the District-wide assessment of impact on European sites (see Section 5.3 'Calculations to predict additional visitors to European sites across the Suffolk Coast & Heaths AONB using Tourist Board data' of the AA of the Core Strategy). Para. 5.3.7 of the AA of the Core Strategy also clearly states that 'these figures are not occupancy rates and should not be read as such.'

The RSPB therefore do not consider that the number of new occupants per dwelling is relevant to the calculation of SANG requirement for an individual development close to a European site. Whilst only 1.57 occupants per dwelling may be new to the District, it is likely that a higher proportion of the occupants will have moved closer to the Deben Estuary SPA/Ramsar than their previous residence. In addition, it is not certain (either at the point of permission being granted, or for the lifetime of the development) that the housing would only be occupied by this given proportion of 'new' residents. Plus, the housing that the existing residents are vacating could well be occupied by new residents to the district, therefore still increasing the new population around the SPA. For these reasons, it is the total number of occupants per dwelling<sup>1</sup> that is the most robust parameter to use in this case.

A recalculation of SANG requirement using 2.3 occupants per dwelling results in an area of 36.8ha. The proposed provision of 25.12ha is therefore below the recommended amount given the scale of the development.

## *2) Contribution to Recreational Avoidance and Mitigation Strategy*

Further mitigation for potential impacts resulting from increased recreational pressure on designated sites was proposed through a contribution to the Recreational Avoidance and Mitigation Strategy (RAMS) which is under development by Suffolk Coastal District Council, Babergh District Council and Ipswich Borough Council. We considered that this would be necessary to avoid adverse effects on the integrity of the designated sites (particularly given the concerns noted above around the sufficiency of the on-site greenspace). We are pleased to note that the updated information includes the intention to secure an overall contribution of £150 per dwelling to the RAMS through the s106 agreement.

### *Comments on loss of breeding nightingale habitat*

Our previous comments also raised concerns regarding the potential loss of habitat for breeding nightingale and skylark. Following a review of the additional information, we are still concerned that the habitat may not be of sufficient quality or quantity to be confident that these species can be retained in similar numbers as previously on site. However, we recognise that some consideration has been given to habitat management for these species,

including reference to the BTO guidance on habitat for nightingales<sup>1</sup>, in the Environmental Action Plan. We recommend that further thought is given to details of proposed management to ensure appropriate habitat quality.

We also note that an outline of measures for managing and funding SANG maintenance/management is given in the Community Cohesion note. Again, while this is welcomed, it may benefit from further detail (e.g. costings, firm funding amounts from the different sources).

I trust that these comments are helpful. If you have any queries about the comments above, please do not hesitate to contact me.

## **SCDC Arboricultural and Landscape Manager**

### *4.20. Final response on 10.08.17*

On 10<sup>th</sup> May 2017 I advised you that I considered that the submitted LVIA for the Adastral Park outline planning application was flawed in as much as the hierarchy of landscape character assessments that form the baseline for the assessment had been incorrectly ordered in that it attributed the regional Landscape east study as being more local than the county level Suffolk Landscape Character Assessment. This issue has now been addressed in the Updated Chapter 11 (of the Environmental Statement) – Landscape and Visual Impact.

Paragraphs 11.5.6 through to 11.5.8 of the Updated Chapter 11 correctly orders the hierarchy of landscape character assessments from national, through regional to local county level. In doing so, paragraph 11.5.13 notes the presence of post-war settlement expansion in the Martlesham area and the associated guidance notes which state that the regular nature of the landscape means that it has more potential capacity to accept significant settlement expansion than the ancient countryside of the claylands. There is also reference to presence of former mineral workings and the focus on them for large scale development because the land is perceived to be of low value.

This correction to the hierarchy of the landscape character baseline does not alter the findings and conclusions of the landscape assessment but rather reinforces its credibility. Therefore the conclusions to my email of 10<sup>th</sup> May 2017 still stand.

We have also received an updated arboricultural assessment to now include individual trees, groups and woodlands in the NW sector that had previously been omitted. Like the rest of the tree survey, it is anticipated that there will be trees that need to be removed to accommodate the proposed development. The full extent of these will ultimately depend on the final detailed submissions so to a degree are indicative for now within the scope of the outline application. Clearance of the trees on the Scheduled Ancient Monument is also included in the proposals. Many of the proposed tree removals are poor quality trees with limited life expectancy, with the rest being moderate quality. It is inevitable that a development of this scale will result in

the loss of some trees to a greater or lesser degree. Accepting this, it is important to secure sufficient new planting that integrates well with the new development proposals and which will have a long term sustainable future. Indications of such planting are included in the received indicative site layout plans and full details can be secured at the detailed application stage. Such is the importance of such new planting that it should be part of the planning application details and not secured subsequently by Condition.

*Response on 10.05.17*

I have carried out a full review of the submitted LVIA for the Adastral Park outline planning application, and I can advise you as follows:

The Landscape and Visual Impact Appraisal (LVIA) has been carried out in accordance with recognised industry guidelines. It considers landscape impacts against a range of landscape baseline assessments from the national landscape character assessment, down to its own very local LCA. However, within this hierarchy, the report contains an error in as much as it attributes (ES para. 11.5.6) the Landscape East assessment LCA Forested Estate Sandlands as being more local than the Suffolk County LCA Estate Sandlands. This cannot be the case as the Landscape East Assessment is a regional survey, whereas the Suffolk one is at County level only. Unfortunately the LVIA goes on to use the Landscape East Forested Estate Sandlands description as the basis for part of its assessment work, whereas the Suffolk County one would have been more appropriate. If the Suffolk County Assessment had been used, the references to mineral extraction and post working uses would have been considered.

The LVIA also includes its own local landscape character assessment, the inclusion of which is justified because of the broad scale nature of both the Landscape East and AONB Character Assessments (which is also described, but it is noted that the application site is outside the AONB boundary). It is likely that this would have still been justified even with the inclusion of a full assessment against the Suffolk County LCA, although the County LCA should still have been included for completeness.

The LVIA has correctly noted the proximity of the AONB and the need to assess potential impacts on the setting of this nationally designated landscape. A ZTV or zone of theoretical visibility has been identified which is the starting point for identifying the visual baseline and from that, viewpoints have been chosen and agreed upon to inform the assessment. These encompass a representative range of a variety of groups of visual receptors including users of public rights of way, and from within the AONB, although it should be understood that it is not an exhaustive list but it will allow for a balanced assessment to be made.

The planning application currently before us is made in outline only and therefore assessments of impacts have to be made within parameters rather than within absolute defined limits. The assessment assumes a maximum

residential building height of 13m. and 18m. for other key buildings. A number of representative viewpoints have been considered, and whilst there are varying degrees of visibility of the site, in many cases visibility is limited by intervening vegetation and/or earth bunding around the existing mineral workings. Assuming that the bunds are to be retained as part of the mitigation of impacts arising from the minerals workings, they can be relied on to maintain their screening role for visual receptors, especially those on public rights of way. However, I do have some reservations about their own inherent landscape impact in so far that they can appear as an anomalous feature in the landscape. However, that can be alleviated by carefully considered new planting that should form part of the overall new landscape mitigation plan.

Views from the AONB have been considered, but for many of the nearest viewpoints, where they exist, there is intervening vegetation and/or landform, and after carefully considered mitigation, it is very unlikely that there will be any significant visual impacts as far as the AONB is concerned.

Any assessment of landscape impact needs to consider the sensitivity of the receiving landscape, and landscape sensitivity is understood from a consideration of the susceptibility of the landscape to change, the type of change proposed, and the value that is placed on the landscape. Bearing in mind the indicated layout of the site, the predicted height of buildings, the extensive areas of green space both within the core of the site, and around the margins to set development back from the site edges, the site is considered to have Medium susceptibility to change. We are advised that the classification of Landscape Susceptibility is given in Appendix H1, but I cannot locate in the folder that I have so cannot advise you on this. Referring to Para.113 of the NPPF, the issue of landscape value is considered. Each of the local landscape character areas is assessed against a number of prescribed criteria and overall the site is considered to be Ordinary and of local importance. It is thus not considered to be valued in terms of the provisions of Para. 109 of the NPPF.

Potential visual impacts are assessed against a range of phases of the development from construction, to early occupation when mitigation planting will still be very new, through to 15 years later as new planting begins to show early maturity. It also has to be kept in mind that a development of this scale will be built out over a number of phases, so the level of effects will be a constantly changing picture. That said, the report emphasises that structural landscape planting will be implemented as early as possible after the start of each phase. It is anticipated that there will be a general west to eastwards progression of development with early eastern structure planting being well established by the time construction begins within its vicinity. This is of relevance where there is a degree of visibility from viewpoints to the east and within the margins of the AONB. Other mitigation measures include consideration of the height of new buildings towards the margins of the site (keeping to 2 storeys), setting development back from site boundaries, and retention and protection of existing trees and hedges wherever possible. The structural landscaping to the eastern margins of the site will provide a

transitional edge to allow the site to integrate with the characteristics of the open countryside beyond. Public rights of way within the site will be kept within new green infrastructure provision.

The issue of lighting is considered. Inevitably lighting during construction phases will be apparent, especially during winter months when the start and end of the working days falls within low natural light levels. Up-lighting will be avoided wherever possible and lights will not be directed towards sensitive receptors. Once completed, the new lighting within the development will be designed to minimise light pollution especially when viewed from the AONB area to the east and southeast. Floodlighting for sports facilities and car parks will be very directional and designed to reduce glare and spill. Lighting around the margins of the site, where they front open countryside, will be minimised where possible to reduce and limit light spill.

In the matter of A12 Highway changes, I have reviewed the proposed changes and, for the most part, have no comment to make although I am concerned by the extent of the proposed tree removal at the Foxhall Road junction. This is especially of concern in that this planting is clearly intended to offset the visual impacts of the waste recycling unit on the land immediately to the south. We should be allowed to fully understand the reasoning behind this proposal and whether it is absolutely necessary. It could be that a degree of limited visibility could be regarded as beneficial in as much as it forces a degree of speed moderation which could lead to a safer approach to the roundabout.

In Summary, Effects arising from the proposed development are considered to be as follows:

- Construction: magnitude of change, short term and High, of which Groundworks will be short term and Low magnitude of change.
- Permanent Development: Moderate magnitude of change on landscape character upon completion, aided by early establishment of green infrastructure. Early planting of site boundaries to the east means that it is anticipated that this planting will be in the ground for at least 12 years before construction begins at that end of the site. If planting is done successfully and achieves good early growth, mitigation of impacts will be effective from early in the built phase. Over time, effects arising from development in the SE corner of the site are anticipated to fall from Low to Negligible.
- Overall the package of enhancement and landscape mitigation measures will result in a Moderate magnitude of change.
- In terms of physical landscape features it is anticipated that there will be a low magnitude of change to Landform. That said, I have some concerns about the very artificial appearance of some of the bunding around that site, and when the applicant gets to a more detailed stage we should consider seeking some easing of some of the bund angles and variation in their profiling. In terms of Land Use, the will be an overall Medium magnitude of change, but within the scope of that conclusion is the

fundamental change of former mineral workings to housing and other built infrastructure, but also much of the existing green infrastructure is retained and enhanced. Areas of trees and woodland will undergo a Medium magnitude of change but this will be substantially positive as it encompasses all the new proposed green infrastructure. The retention of the existing waterbody will undergo a Neutral magnitude of change.

- Considering site character, and bearing in mind factors such as the removal of mineral extraction plant, enhancement proposals for the green corridor and wider green infrastructure, the intended stand-off from the southern, eastern and south eastern boundaries, and other measures, it is considered that the development will have a localised Low magnitude of change on the relationship with the settlement edge, landscape pattern and character to the east of Martlesham Heath.
- Visual effects are considered for a wide range of receptors and viewpoints, and the anticipated effects arising are inevitably wide ranging from Major and Adverse during construction phases (albeit short term), to Low for surrounding road users. Critically, visual impacts for residents of properties adjacent to and overlooking the site are rated as Low to Neutral, and Low for visitors to the Moon and Sixpence holiday park. Footpath and Bridleway users will have a range of experiences depending on location and the nature of the view from Moderate to Low magnitude of change.
- Potential impacts on the AONB have been considered and it is concluded that the magnitude of change arising from development within the setting of the AONB is graded as Neutral, bearing in mind the set back of new buildings from the site boundary and the proposed new boundary planting.
- In considering the significance of effects arising from development, this is assessed through combining magnitude of effects against the sensitivity of the landscape and visual receptors. Considering all the different circumstances previously discussed in this email, the most significant effects are rated as Moderate Adverse and are attributed to landscape character during construction, landscape features during construction, and localised users of public footpaths and bridleways. In respect of the permanent development, the significance of effects on landscape character are also assessed as Moderate Adverse. The significance of all other effects is rated as no worse than Minor Adverse, and that includes Visual effects.
- Night time effects are reviewed but it must be accepted that at an outline stage these are not easy to fully assess. It is anticipated that they will be no worse than Minor adverse.
- The site is not considered to be a 'Valued Landscape' in the terms of NPPF109, but is considered to be of 'Ordinary' character in relation to its physical attributes and as assessed under the indicators shown in Box 5.1 GLVIA3.
- Overall the proposals have been assessed as having a long term Moderate Adverse effect on the landscape character of the site, and also the same on the relationship with the existing settlement edge. This is a result of the scale of the proposals which will see the introduction of residential development into a mature landscape framework. However, such effects



are offset by the restoration of existing mineral workings and the introduction of substantial new green infrastructure.

- Provided that, as a planning authority, we can secure high standards of building design and high quality, well specified landscape mitigation proposals, I agree with the report that there should be no significant adverse effects arising that will justify refusing the proposal on landscape related grounds.

### **Suffolk Coasts and Heaths AONB**

4.21. *Final updated comment (02/10/17):* With reference to the illustrative CGI aerial image for the south-east corner of the site recently supplied by Helen Adcock, I have the following additional comments:

For the purposes of the outline application, we consider that securing the swathe as shown in the illustrative CGI offers the opportunity to address our concern about the generosity of space in this location for appropriate mitigation. We understand that the width of the swathe ranges from c. 30m – 100m and that this will be set aside from any potential built development. The CGI is helpful of course in showing the potential for the landscape scheme, however, we understand that the final detail will be fully addressed as part of the reserved matters submission. At that stage, we will be interested in contributing to the conversation about the quantity of hedgerow and tree planting to the east of the bridleway and considering the extent to which visual permeability through this boundary should be provided.

*Original response (25.07.17):* The proposed development is in close proximity to a nationally designated Area of Outstanding Natural Beauty (AONB). The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. The Local Planning Authority should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Please refer to the attached AONB Partnership Position Statement regarding development in the Setting of the AONB. This highlights relevant policies within the AONB Management Plan which should be taken into account in the determination of the application. The Suffolk Coast & Heaths AONB Management Plan has been endorsed by all local authorities across the AONB and is supported by the organisations that make up the AONB Partnership.

Given the location of the site, policies within the Deben Estuary Plan are of significance in determining this proposal. The Deben Estuary Plan has been endorsed by Suffolk Coastal District Council in accordance with Planning Policy SP30, ensuring that it becomes a material consideration in relevant planning decisions and informs other relevant decisions in the area.

The Planning Authority will of course apply relevant national and local policies in relation to the AONB together with local landscape expertise and information to determine the proposal. Particular attention is drawn to paragraph 115 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 116 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

*Landscape & Visual Impact within setting of the AONB*

The south-east corner of the site is closest to the AONB and likely to be the area where there will be the most significant impact in terms of change of character. We note from the photomontage images, as observed from the junction of Ipswich Road and Newbourne Road identify a significant bulk of visible development from this viewpoint. The proposed planting for the south-eastern corner (identified at No. 5 on the Green Infrastructure Phasing plan) is not adequate to fully mitigate the visual impact of the built form. Further consideration should be given to increasing the area of land available for mitigation planting in this particular zone in order to provide a much more robust planting.

It is recommended that improvements to the existing hedgerow boundary along Newbourne Road and Ipswich Road are secured. We note of course that this is outside of the red-line and will require third party agreement, however, it is considered that improving the existing features of the landscape character immediately adjacent to the site would improve the overall effectiveness of mitigation planting, particularly when viewed from this south eastern corner. The Strategic Landscaping Plan states that: *The proposals look to locate the development within an established wooded landscape. The existing vegetation cover both within the site and the wider landscape restricts views over the site, with additional planting both within and to the site boundaries enhancing the setting and allowing the development to assimilate into the landscape.* As the proposal currently stands, we do not consider that the planting in the south-eastern corner is sufficient to achieve this aim.

*Recreational Access and Proximity to Deben Estuary Special Protection Area, Deben Estuary Ramsar and Deben Estuary Site of Special Scientific Interest*

As identified in the application documents, we are aware of the advice already provided by Natural England in relation to the above designated sites. The Deben is a distinctive area of high quality estuarine landscape with internationally significant habitat for wildlife. The exceptional quality of the estuary makes it a special place to live and work and a valued destination for visitors. It is fully anticipated that residents of the new development will wish to visit the estuary. Whilst the provision of the Suitable Alternative Natural Greenspace (SANG) forms part of the mitigation required, it is essential that measures are in place to manage the additional recreation pressures likely to be placed on the Deben Estuary, particularly from nearby access points at

Waldringfield and Martlesham in particular. The SANG must be of an outstanding quality to be fully effective in encouraging recreation close to where people live, thus reducing pressures on nearby designated sites. The arrangements for long term management of the SANG to ensure community participation and engagement in management is something we are keen to see secured at an early stage. A Management Plan for the SANG and a clear means of funding delivery of ongoing management, maintenance and monitoring of the effectiveness of the mitigation will need to be secured.

*Please consider the Deben Estuary Plan Policy 3.6.60 Seek to minimise and put in place measures to mitigate pressure and disturbance within the estuary area. Promote and facilitate the adoption of a range of mitigation measures which are appropriate to particular sites and levels of disturbance.*

The Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) currently being developed would be the most appropriate means of securing contributions towards ongoing visitor management measures, such as provision of community information relating to the special qualities of the estuary, wardening etc. However, in addition to this we would recommend that significant investment in the Public Rights of Way Network surrounding the site is also secured by way of s.106 agreement. This is to acknowledge the increase in demand for recreational access, to support sustainable travel between the proposed new development and existing settlements, services, recreational facilities and leisure opportunities.

We also draw attention to the Deben Estuary Plan *Policy 3.2.28 The estuary and surrounding countryside is an important environmental, social and economic asset which enhances the wider area.*

- *Foster understanding of the interdependent relationship between elements of the estuary landscape, local economy and public amenity, recognising the Deben Estuary as an important environmental, social and economic asset, which enhances the wider area.*
- *Conserve and enhance the estuary landscape, valuing the characteristic features that it displays: the open aspect of the river, the mosaic of fields and trees on the valley sides, the wooded valley ridge and Scots pines on headland promontories.*
- *Value and conserve the landscape's distinctive heritage assets and archaeological features: the churches, chapels, military defence structures, old landing hards and quays, ancient fish traps, old burial grounds and crag pits.*
- *Recognise and value the riverscape and the landscape of the Deben Estuary as seen from the river.*
- *Support high standards for the built environment, ensure new build is sensitive to the estuary topography, is unobtrusive and sits comfortably within the riverscape.*
- *Promote the retention of dark skies and restrict or lessen the impact of an increase in exterior lighting in areas where lights will be visible from across a wide area of the estuary.*

- *Ensure conservation aims and projects contribute to safeguarding the landscape and character of the estuary – particularly in relation to saltmarsh.*
- *Recognise that tranquillity is an important part of the character of the estuary. Retain and conserve the quiet, rural areas of the estuary where there is limited noise and disturbance.*

To effectively deliver all of the above, we consider that detailed and secure commitment to participation in the RAMS Strategy is agreed prior to the determination of this application.

The informal recreational access arrangements around the site appear to offer an attractive 'on-site' facility for the community, however, as suggested above, more detail is required in relation to sustainable access beyond the site boundary. Please note that initiatives including 'Quiet Lanes' operate in Waldringfield and are designed to encourage use by non-motorised users.

With a significant population increase, it is fully anticipated that car use will increase around the site. In terms of the AONB, this presents concern that the special qualities could be adversely affected, in particular tranquillity. Effective mitigation to reduce impacts on tranquillity such as investment in measures to reduce car use in particular are recommended to avoid pressures on nearby popular destinations.

I hope that these comments are of assistance. We would welcome the opportunity to offer further advice on AONB matters should any additional information be submitted prior to the determination of this application.

## **SCDC Environmental Protection**

### **In respect of Noise, Contaminated Land and Lighting**

4.22. Thank you for your consultation regarding the proposed development above. I have no objections to this development but have the following comments:

#### **Contaminated Land**

The outline Planning Application contains a Phase II contaminated land intrusive investigation report which details a survey of the site including two specific areas where former land uses may adversely impact residential development. These include a historic Sewage Works, a Former Landfill Site known as The Swale and an active Quarry and Landfill area known as Waldringfield Quarry. Some petrol and diesel tanks have also previously been recorded as being present on site.

Localised 'hot spots' have been identified where; mercury, lead, arsenic, coal tar PAHs and benzo(a)pyrene concentrations exceed guidance levels. In addition, ground gases associated with the former landfill sites are venting at a rate which may adversely impact on the proposed development.

A remediation scheme is presented to delineate the areas of contamination and recommend works to safeguard the proposed development. This mentions the removal of any contaminated soils to facilitate placement of a capping layer; for front gardens and landscape areas this is proposed to consist of 300mm layer of clean fill and for rear gardens a 600mm layer of clean fill. The clean fill being GEG verified material. Plus a VOC membrane beneath all gas affected buildings. Levels of TPH's in areas of made ground also present a risk to underground plastic services and therefore all services should be suitably protected from degrading by either the removal of contaminated soil or the use of resistant pipework.

Further investigation is recognised as being necessary particularly around the quarry buildings in the vicinity of the fuel tanks to delineate any further 'hotspots' of; hydrocarbon/PAH and asbestos contamination. Additional gas and groundwater monitoring is also being recommended.

A desk study for unexploded ordnance is also included but states that no mitigation measures are deemed necessary.

In view of the levels of ground gas and contamination in Areas 1 and 2 (as defined in the contamination investigation report), additional remediation is deemed necessary and should consist of; a brightly coloured Geotextile membrane which will act as a marker layer under all residential gardens and buildings which will exist within Areas 1 and 2.

Details from the further investigation work which is planned shall be made available and if any previously unidentified contamination is encountered this shall also be reported within a remediation scheme approved by this Authority. I should remind the applicant that the Remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Unless otherwise agreed in writing by the Local Planning Authority (LPA) prior to any occupation or use of the approved development the approved Remediation Method Statement must be completed in its entirety. The LPA must be given written notification two weeks prior to the commencement of the remedial works.

Unless otherwise agreed in writing by the Local Planning Authority (LPA) a validation report must be submitted to and approved in writing by the LPA prior to any occupation or use of the approved development. The validation report must include but is not limited to:

- evidence that the approved Remediation Method Statement has been carried out competently and effectively in its entirety; and
- evidence that the remediation has been effective and that the site is now suitable for the approved development.

## Noise

The outline Planning Application contains a 'Brookbanks Noise Assessment Report', dated March 2017, (project number 10391) which assesses the likely impact of noise and vibration to residential properties.

The predicted noise impact from construction activities to existing properties which lie in excess of 150 m from the development is estimated to be 61 dB this meets the threshold requirement of BS 5228:2009 'Code of Practice Noise & Vibration Control on Construction and Open Sites'. Ground-borne vibration is also not considered likely to impact on existing residential property and is therefore compliant with BS 6472.

Traffic noise has been modelled using SoundPLAN and predictions in road noise up to the year 2027 have been used to calculate the window glazing at properties adjacent to; the A12 dual carriageway, Ipswich Road and at the proposed Primary School. Internal levels are required to meet 35 dB presented as a LAeq (16 hour daytime) parameter and 30 dB presented as a LAeq (8 hour night-time) and 45 dB LA<sub>max</sub> parameters to comply with BS 8233: 2014 when measured in accordance with the Association of Noise Consultants Guidelines: Noise Measurement in Buildings, Part 2 Noise from External Sources, 2013. These noise criteria shall be met when windows to the room are closed and any passive ventilation is open. All noise readings results aimed at achieving these standards shall be submitted within the full Planning Application and agreed to be accurate with the Local Planning Authority.

Details of a Glazing scheme to achieve the BS 8233: 2014 standard shall be specified in the full application and agreed in writing with the Local Planning Authority prior to any development.

It is further recognised that if windows are opened it will adversely impact on the internal noise levels and exceed the above standard. Consequently, properties fronting the main highways will require additional ventilation measures in order to achieve ventilation standards, without the need for windows to be opened. These properties are coloured yellow in Figure 8e of the Brookbanks report.

Details of a Ventilation scheme to achieve the BS 8233: 2014 standard shall be specified in the full application and agreed in writing with the Local Planning Authority prior to any development.

Glazing and ventilation installed to achieve the BS 8233: 2014 standard shall be acoustically tested to ensure it meets the agreed standard and shall be retained and maintained in the approved form thereafter unless otherwise agreed in writing with the Local Planning Authority.

External gardens and amenity space is required to achieve a maximum level of 55 dB presented as a LAeq parameter to comply with BS 8233: 2014. The Brookbanks report indicates this is achievable by shielding, in the form of a 5m

high bund adjacent to the A12 dual carriageway and a 2m high bund adjacent to Ipswich Road. Whilst the Brookbanks report mentions that noise screening may be in the form of a bund or combination of a bund and acoustic fence, it is my opinion that a bund to the full height is a better long term option.

Details of noise screening bund/barrier adjacent to the A12 Dual Carriageway, Ipswich Road and the proposed school shall be specified in the full application and agreed in writing with the Local Planning Authority prior to any development.

The site layout and orientation of properties fronting onto the A12 Dual Carriageway and Ipswich Road shall be specified in the full application and agreed in writing with the Local Planning Authority prior to any development. This shall include external features such as the positioning of garages and boundary walls which may be utilised for noise screening purposes where appropriate.

The internal layout of properties fronting onto the A12 Dual Carriageway and Ipswich Road shall be arranged with non-vulnerable parts of the dwellings facing away from these external noise sources where appropriate. Again these shall be specified in the full application and agreed in writing with the Local Planning Authority prior to any development.

Properties outside the first row of housing adjacent to A12 Dual Carriageway and Ipswich Road with habitable rooms in loft spaces which may be insufficiently protected by the noise screening bund/barrier and thus impacted by road noise, shall be identified within full Planning Application and an additional Glazing and Ventilation scheme shall be specified and agreed in writing with the Local Planning Authority prior to any development.

A maintenance agreement shall be required to ensure the noise screen bund/barrier and any stabilising planting is maintained to the specified standard. This shall be specified in the full application and agreed in writing with the Local Planning Authority prior to any development.

A Construction Environmental Management Plan (CEMP) is proposed in the outline Planning Application to mitigate noise from construction activities and this is proposed to contain;

- Construction activities should be confined to times of the day when they are least likely to be disturbing;
- Careful selection of plant, construction methods and programming. Only plant conforming with relevant national or international standards, directives and recommendations on noise and vibration emissions should be used;
- Construction plant should be located, as far as is reasonably practicable, away from adjacent occupied buildings or as close as possible to noise barriers or site hoardings where these are located between the plant and the buildings;

- Static and semi-static plant/equipment (e.g. compressors and generators) should be fitted with suitable enclosures where practicable;
- Personnel will be instructed on best practice to reduce noise and vibration as part of their induction training and as required prior to specific work activities;
- When plant is not being used, it should be shut down and not left to idle;
- Methods of work and vehicular routes will be selected with regard to minimising noise and vibration impact; and
- Given the phasing of construction, certain areas of the Proposed Development will be occupied while construction is still underway in adjacent areas. Where possible, the occupancy of completed phases of construction should be planned in such a way that there is a buffer between occupied areas and areas where construction is being carried out.

This Construction Environmental Management Plan (CEMP) shall be specified in the full application and agreed in writing with the Local Planning Authority prior to any development.

Any B1 or B2 business activity associated with the new development shall be identified and agreed in writing with the Local Planning Authority prior to any development.

All commercial development such as: restaurants, public houses, shops, doctor's surgeries etc. and associated parking within the new development shall be identified and agreed in writing with the Local Planning Authority prior to any development.

Details of all areas which may be used for public activities such as; play areas, sports areas, skateboarding, outdoor music use, or other potentially noisy activities shall be identified and agreed in writing with the Local Planning Authority prior to any development.

#### Lighting

The outline Planning Application contains a 'Lighting Appraisal Report', dated March 2017, (project number 10391) which assesses the likely impact of lighting during the construction phase of the development and the operational impact to residential properties on the completion of the development.

A list of mitigation measures have been identified and will be included within the Construction Environmental Management Plan (CEMP), these include;

- A named individual for the public to contact should there be any complaints related to temporary lighting installations;
- Specified working hours and the location of construction compounds should be agreed in advance. The location of the compound and storage areas should take into consideration the location of sensitive receptors.



- Lighting should to be switched off when not required unless specifically needed for construction activities, security and/or health and safety requirements;
- Glare caused by poorly directed lights can be minimised by ensuring that light fittings are horizontally mounted and directed away from the boundaries of the Site. Lighting should be confined to the defined area intending to be illuminated;
- The use of appropriate hoarding (if deemed necessary) can contain surface level illumination on the boundaries of the construction areas; and
- Light spill can be minimised by avoiding poorly sited lights on the boundary of the Site. Lighting will be located and directed so that it does not cause unnecessary intrusion to adjacent residential properties.

Little detail has been presented within the outline planning application for the long term lighting use in; the employment areas, school areas, outdoor play areas, sports grounds, public activity areas or associated parking. Hence, a detailed lighting scheme for these areas shall be specified in the full application and agreed in writing with the Local Planning Authority prior to any development.

#### **Environmental Protection - In respect of Air Quality**

- 4.23. The final response is awaited based on final information received in late 2017. No objection is expected an the response will be part of a late report.

#### **SCDC Housing**

- 4.24. The amount, layout, landscaping, and appearance of the development have been reserved for later reserved matters approvals. We therefore cannot comment on the overall mix of the development at this stage.

We note the Affordable Housing Statement declares “The Applicants proposals will enable the delivery of up to 33% affordable housing in a tenure split of 60% Affordable Rent, 10% Intermediate Rent and 30% Affordable Housing for Sale. We look forward to receiving a revised Affordable Housing Statement taken into account recent discussions between the Council and the Applicant.

Suffolk Coastal’s Housing Authority is satisfied that after reviewing the Applicant’s viability study, the following mix is appropriate for affordable housing delivery at Adastral Park.

- 25% total affordable housing on site (500 homes)
  - 25% Affordable Rent (125 homes)
  - 25% Intermediate Rent (125 homes)
  - 25% Shared Ownership (125 homes)
  - 25% Discounted Market Sale (Shared Equity) at 75% of open market value (125 homes)

We note the S106 Agreement is to include the opportunity for a range of further intermediate tenures (for example rent to buy) to be considered / delivered subject to agreement and financial parity with the above tenure mix (not including affordable rent). We would welcome the opportunity to discuss this further upon compiling the s106 document.

We welcome the Applicant's agreement to a 10% increase on the previously modelled floor areas. We will comment further upon receipt of revised floor plans.

We would have previously advised upon the affordable rented mix component making up the affordable housing on site. We advise the following mix for the affordable rented properties:

- 40% 1 bed 2 person units
- 40% 2 bed 4 person units
- 15% 3 bed 6 person units
- 5% 4 bed 7 person units

The mix for the rented units is based on a number of factors including:

- The context - priority for these new homes will be given to Applicant's from the local housing market area rather than just Martlesham
- An analysis of need based on a snap shot from the housing register
- Consideration of the mix of existing affordable housing stock in Martlesham
- Weighing up the objectives of meeting greatest need and demand alongside the objective of creating a balance within any new scheme.

Subject to:

- This mix being delivered evenly i.e. in each tranche/phase; and

We trust this provides you with sufficient early feedback into the overall affordable housing mix. We welcome the opportunity to discuss the affordable housing proposal in further detail with the Applicant.

### **Ipswich Borough Council**

4.25. Members resolved that Ipswich Borough Council raises no objection to the planning application subject to the following matters being addressed:-

1. Provision of effective sustainable transport measures for use by future occupiers of the site should be secured. The services and measures should be in place for the first phase of development because of the infrastructure provision anticipated in the first phase of the development. Ipswich Borough Council would require a green travel plan for developments of 1,000 homes or greater.

2. A master plan forming part of this application, addressing issues such as phasing, footpaths and cycleway provision and how these link with the existing network, green infrastructure and general layout as well as the number of homes (even if given as a range), and the broad location of the primary local centre etc.
3. Confirmation that the off-site highway works proposed to the A12 are the most effective means of ensuring traffic flow rates generated by the proposal are managed effectively.
4. No adverse impact to existing traffic flows along Foxhall Road and other roads into Ipswich.
5. Confirmation that existing community infrastructure within Ipswich Borough will not be adversely affected by the implementation of the proposal should it be approved.
6. The future needs of the aging population of SCDC are factored into the housing mix as appropriate.
7. A Construction Plan being approved as part of the planning application which minimises the impact on the existing traffic using the A12.
8. There should be a limitation on the size of the individual retail units to ensure that they are of a scale appropriate to serve the size of the residential development proposed in accordance with the adopted Core Strategy retail policies relating to primary local and secondary centres.
9. Limiting the use of the employment site to the uses referred to in SCDC's Core Strategy Strategic Policy 5 so as to fulfil SCDC's vision of developing a high-tech business cluster.
10. Consideration of the timing of the infrastructure requirements (including green infrastructure in line with the Haven Gateway Green Infrastructure Strategy) as an integral part of the planning application being considered.

I shall be grateful if you could keep me updated on any significance changes to the application, and once determined please send me a copy of the decision notice.

Finally, your attendance at the Planning and Development Committee Meeting was greatly appreciated.

#### **Suffolk Constabulary - Designing Out Crime Officer**

- 4.26. I have viewed the available outline plans and would like to make the following comments on behalf of Suffolk Constabulary with regards to Section 17 of the Crime and Disorder Act. I take on board that this is an initial outline planning application and that further details will be forwarded by the developers at the Reserved Matters stage. As a result I feel that at present I do not have the level of detail I require to make specific individual comments in relation to 'designing out crime' for this outline application. However, I recommend that the development should seek to achieve Secured by Design SBD New Homes 2016 accreditation.

As the proposed development area comprises a former commercial site, historically it is a low crime area. However, the surrounding area, continues to suffer spates of Theft from Motor Vehicles. Along with Anti-Social Behaviour events, mainly linked to Boy Racers and motorists either speeding, or driving with undue care and attention around Anson Road and Beardmore Park. Further crime statistical information can be obtained by referring to the national Crime mapping system.

As stated in the outline plans the area is classed as a rat run and I therefore trust the design will look at techniques and principles to assist with the orientation and navigation of the site, creating identifiable spaces to discourage and minimise the risk of crime and Anti-Social Behaviour through natural and informal surveillance. I applaud the developers stated aims within the Planning Statement that the design will take into account the need for crime prevention.

My specific observations for this development are as follows: (Further details of the following recommendations can be found in the aforementioned SBD document "New Homes16"). I note from the Design Access Statement (DAS) makes mention on page 35 of rear courtyard parking with drive through access. It has historically been proved that rear courtyard parking assists' offenders in stealing from motor vehicles, so I would recommend against such proposals, unless it can be shown that there will be significant natural an informal surveillance of such areas, in order to deter such events.

I would like to have more information on the two Allotment areas and in particular if there will be any surveillance affordable from nearby properties?

The Planning Statement at page at Para 2.7 (page 16) under "Key Benefits" states that the development will deliver well-designed homes based on principles of good, sustainable and inclusive design and deliver a new community in which residents will be proud to settle and integrate with the surrounding existing communities. In order for this to succeed you need good security and good natural an informal surveillance of the area.

Car Parking Communal parking facilities must be lit to the relevant levels, as recommended by BS5489:2013 and a certificate of compliance provided. (See section 16 SBD Homes 2016 for the specific lighting requirements as well as recommendations for communal parking areas.)

I would like to know more about how the public open spaces by the two lakes will be demarked in order to provide safety and security for young children and I would also like to know more about the design for the walkways for these areas.

I would like more detail on how the perimeter boundary for the northern side bordering the agricultural land will be designed.

I would recommend all rear properties are secured with either 1.8m, or 1.5m close boarded fencing. Should the second option of 1.5m fencing be preferred to allow more natural light, then I would prefer it was supplemented with a further 300 cm high trellis.

I would like to see 1 metre metal hooped railings around the communal areas.

Should any play equipment be installed it should meet BS EN 1176 standards and be disabled friendly. I would recommend that any such area has suitable floor matting tested to BS EN1177 standards.

Should gymnasium/fitness equipment be installed as mentioned in the DAS at page 65, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.

All litter bins should be of a fire retardant material.

Attention should be paid to the sighting and fixing of Gates, Fences, Seats and Pathways. Page 17, of SBD New Homes 2016 at Paras 9.1-9.4, under the heading "Communal Areas" refers.

The physical security element of the application should not be overlooked. Doors and windows should be to British Standards (PAS 24) for doors and windows that ensure that the installed items are fit for purpose.

#### Conclusion

I strongly advise the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development.

SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide. namely Gold, Silver or Bronze standards It is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design.

I strongly recommend any proposed business units are designed along Secure By Design guide lines, through SBD commercial 2015 Version 2.

I strongly recommend the schools are designed along Secure By Design guide lines, through New Schools 2014.

As I do not have sufficient information on the proposed planning application, I can neither approve, nor object to this proposed plan. I would, however, be pleased to work with the agent and/or the developer to ensure the proposed development incorporates the required elements. This is the most efficient way to proceed with residential developments and is a partnership approach to reduce the opportunity for crime and the fear of crime.

### **Suffolk Constabulary – Traffic Management**

4.27. Suffolk Constabulary has a commitment to ensure that the safety and wellbeing of the communities it serves is at the fore of all its activities. Therefore, the Constabulary seeks to engage in the planning process and work with developers, planning authorities and other key stakeholders to ensure the delivery of sustainable developments.

The impact of the proposed 2,000 homes on the Adastral Park development, on police and community safety, if not mitigated through the appropriate channels available through the planning process, will have the potential to have an adverse impact on the police service received by the existing and emerging community.

Evidence shows that addressing policing issues retrospectively, be these Roads, community or other strands of policing, will incur greater costs in terms of both financial and damage to the community impacted upon.

As a statutory consultee in relation to Traffic Regulation Orders and as such working closely with both Suffolk County Council and Highways England for upgrades to the road network, the Constabulary wishes to ensure that where appropriate it affords its knowledge and expertise to assist in making Adastral Park an exemplar development.

All parties are aware that the impact of the roads infrastructure, for a development of the size of Adastral Park, will have implications beyond that of the immediate vicinity. If not managed appropriately, strategic arteries like the A14 that links the Port of Felixstowe to the UK could be adversely impacted upon. This would have far reaching implications to commerce beyond Ipswich and indeed Suffolk.

The previous proposals to implement traffic light junctions on the A12 in the vicinity of the proposed development were changed in favour of keeping the current roundabouts and adding additional lanes to deal with the additional capacity and introducing speed reductions for road safety.

Suffolk Constabulary was concerned with how the changes and additional volume of traffic would work with the A14/A12 Seven Hills interchange and other locations such as the Foxhall Road roundabout.

A meeting was arranged between Suffolk County Council, Suffolk Coastal District Council Planning, Carlyle Land Ltd, Brookbanks Consulting Ltd and CEG to update the Constabulary on the current proposals and explain mitigation measures.

The meeting was extremely useful. The issues of reducing speed limits and enforcement methods to ensure speed compliance, thus making the roads safer for all road users were discussed. Assurances were given that finance would be set aside to deal with these issues as they arose during and after the development was complete.

Suffolk Constabulary understands that traffic modelling data has recently been provided to the highway authorities for them to interpret. The Constabulary do not know what the results show at this time and are cautious in response until it is understood how the proposals will affect the A14 trunk road interchange and the other roundabouts along the A12 corridor from a traffic volume, road safety and enforcement perspective.

Suffolk Constabulary look forward to working with the appropriate parties to ensure that where applicable, measures to mitigate the impact of the Adastral Park development are put in place and recognised through the planning process, allowing for Adastral Park to be a sustainable development.

#### **Suffolk Constabulary - Business Liaison Officer**

- 4.28. Suffolk Constabulary submitted a Technical Note to Suffolk Coastal DC and Clyde & Co (acting for the applicant) on 11th December 2017, responding to

a series of points raised by Clyde & Co in relation to the Constabulary's initial consultation response dated 24th May 2017.

The Technical Note incorporated an updated list of police resources/ facilities/ infrastructure considered to be necessary to mitigate the impact arising from the proposed development, which is summarised below;

- i) Funding for 1 x Police Community Support Officer (3 years) - £95,136
- ii) Recruitment & equipping of 6 x Officers - £61,762
- iii) Funding for 3 x Police Vehicles - £62,250
- iv) Funding for 2 x Automatic Number Plate Recognition Cameras - £120,146
- v) Funding for new/ extended premises (80 m2) - £176,000
- vi) Total funding sought - £515,294

A meeting was subsequently arranged with the applicant representative (Peter Village) his legal and planning advisers (Ian Ginbey/ Helen Adcock) and the Planning Case Officer (Ben Woolnough) to discuss Suffolk Constabulary's updated position.

In reviewing the planning parameters set for the provision/ funding of the Adastral Park New Community infrastructure, (i.e. Strategic Policy SP20 of the SCDC Core Strategy and the SCDC CIL Regulation 123 List) it was evident that the development may be legally/ procedurally precluded from providing any infrastructure to be otherwise funded by CIL.

As this approach incorporated 'police infrastructure' it was agreed that items iii), iv) and v) above, whilst meeting the CIL/ NPPF tests for imposing a planning obligation, would need to be provided by the CIL route in this instance.

In the light of the above, it is proposed to provide (and allocate) a new Police Community Support Officer (PCSO) to the proposed development, who would form part of the Constabulary's Woodbridge Safer Neighbourhood Team, and form a key resource in delivering the Community Cohesion Strategy.

Funding would therefore be required for the duration of the three occupational phases of the proposed development (14 years) following which the funding of the PCSO would be brought into the Constabulary's baseline staffing/ establishment running costs.

As set out in the Constabulary's May 2017 consultation response, the preceding technical note, and in summary at Annex 1 below, the cost computation for funding and equipping a PCSO (less ICT/ furniture costs) is as follows;

- 1 x PCSO @ £31,712/yr x 14 years = £443,968
- Equipment for 1 x PCSO = £6,400;
- Total contribution sought = £450,368

In terms of the 'payment triggers' to be reflected in the Section 106 Agreement, a contribution at commencement of the development, and thereafter at the beginning of development phase 2 and 3 (see Table 1 above) is proposed as follows;

£133,248 (equivalent to years 1 – 4 plus equipping cost) – upon commencement of development;  
£126,848 (equivalent to years 5 – 8) - upon completion of 500 dwellings;  
£190,272 (equivalent to years 9 – 14) – upon completion of 1,000 dwellings;

Suffolk Constabulary Updated Position – Police Funding/ Resources Sought to mitigate the impact of the new development/ population arising at the Adastral Park New Community – Community Cohesion Strategy

In light of the reasoned justification set out above, a financial contribution of £450,368 is sought for ensuring that adequate provision is made to integrate the emerging community with the existing community, and provide an appropriate level, and duration, of community safety, cohesion and policing across the construction and occupational phases of the proposed development.

This approach is considered to meet the tests for imposing a planning obligation in line with Regulation 122(2) of the CIL Regulations and Paragraph 204 of the NPPF, as it is;

- Necessary to make the development acceptable in planning terms;
- Directly related to the development;
- Fairly & reasonably related in scale & kind to the development;

The Constabulary trust this note is of assistance and look forward to the applicant and Council's consideration of this matter.

In the event that a suitable position can be agreed, Suffolk Constabulary's holding objection can be removed, and a further consultation response confirming this position would be issued to SCDC for the purposes of the Officers report to Planning Committee on the 15th January 2018.

### **Economic Services (SCDC)**

4.29. The Economic Development team seeks to support those planning applications where the application clearly supports the economic growth and regeneration of the economy within the Suffolk Coastal district. In particular, we seek to comment on non residential floor space (increase/decrease), commercial demand, jobs (created, lost or sustained) and strategic fit.

We would broadly welcome the proposed development of 2000 dwellings and the primary and secondary centres as described. This is consistent with the economic growth agenda outlined in local strategies (East Suffolk Growth Plan 2014 to 2025, the East Suffolk Business Plan, Suffolk Growth Plan and the New Anglia LEP Strategic Economic Plan).

We recognise that the development will provide direct and indirect employment at the construction phase. There will also be employment opportunities at Brightwell Barns and in on site facilities including retail and education. We welcome all the additional employment space the development will provide including those in the 'northern quadrant'.

The site is adjacent to Martlesham Heath high- tech cluster in which innovative new businesses are being spun out of BT's high-tech research and



development facility at Adastral Park. The proximity of the development should not be prejudicial to the plans for Innovation Martlesham to increase the number of new businesses from 100 to 200. This would form part of the ICT sector offer identified in the response to the Government's recent Industrial Strategy Green Paper by East Suffolk Councils, Suffolk County Council, New Anglia LEP and major businesses including BT.

4.30. **National Grid Cadent Gas Limited**

Confirmed in a phone call that no assets affected and no written response will be provided.

4.31. Consultation were also letters sent to the following:

**The Ramblers Association** – No response received

**The British Horse Society** – No response received

**Ancient Monuments Society** – No response received

**Twentieth Century Society** – No response received

**PARISH CCOUNCIL, TOWN COUNCIL AND COUNCILLOR CONSULTATION RESPONSES**

4.32. The application site covers three Parish Council areas. The majority of the site is within Martlesham Parish, which also covers the areas to the north and west. Brightwell Parish covers a southern part of the site and half of the A12 frontage. Waldringfield Parish covers a small eastern part of the site.

4.33. The consultation process has involved close engagement with those three Parish Councils. Due to the scale of the site a wider range of Parish Councils in the area were also consulted.

**Martlesham Parish Council**

**Full consultation responses provided as Appendix 5.**

4.34. *December response (Summary):* Martlesham Parish Council has not opposed the development proposals from CEG until now. However we feel that until the following issues are addressed it is the council's view that it should not be approved:

- 1) Safe, efficient, validated designs for the Foxhall Road, BT and Tesco roundabouts.
- 2) A solution to the increasing volumes of traffic on the old Felixstowe Road.
- 3) Measures to address the levels of journey delay in the old Martlesham area as identified in Table 8, as referenced earlier in this response.

- 4.35. *Summary of initial position:* We would welcome the nature of the outline planning application which has the potential to “deliver a high quality exemplar development built to the highest environmental standards. It offers the opportunity to create a high quality legacy development in very much the same way as the Martlesham Heath village has become” (SCDC 2013 Local Plan). We also refer to the terms of the Local Plan’s SP20 policy which set out the strategy for the area and the infrastructure required.

Three major concerns still exist:

- The capability of the Transport Infrastructure, which is already congested at peak times, to cater for this size of development, including growth in the Retail Park. The CEG proposal for traffic lights just at the new junction is welcomed but we (and our Parishioners) still have major concerns on this issue.
- The future of Health Care facilities: Whilst we understand the land ownership difficulties of significantly extending the current surgery, Martlesham has an aging population which will put further demand on health care. It is likely that the new residents of the development will not have the same needs or mobility issues (i.e. they will be younger), and if a “super surgery” is eventually built centrally to the new development it will be out of balance with its main user base.
- The timely provision of facilities which will protect the environment, provide an attractive development and ensure the amenity of existing residents while forming a strong Martlesham wide community.

#### **Brightwell, Foxhall & Purdis Farm Group Parish Council**

- 4.36. *December response:* The Parish Council decided that they do not have any objections to the latest submission Transport Assessment Revision 6.

- 4.37. *Initial Response:* The Group Parish Council objects to this application. Whilst we do not object to the principle of development and are pleased that the development includes appropriate infrastructure we are concerned that the proposed changes to the local road network are insufficient to mitigate the large increase in traffic which will be generated by the development of 2000 dwellings at this location. In particular we would like to see the 50mph speed limit extended to cover the full length of the A12 from the Brightwell Roundabout to the existing 50mph limit near the Park and Ride roundabout. We are also concerned that only minor changes have been proposed to Foxhall Road.

As this road will see a huge increase in traffic the changes to the roundabouts at either end of the road are in themselves insufficient. The opportunity should be taken to introduce a 40mph speed limit along this road from the existing limit near the Foxhall Stadium to the Brightwell roundabout. Proposals should also be put forward to improve both the Bell Lane crossroads and Dobbs Lane

junction. Finally we would also like to see proposals to improve the Gloster Road junction with the BT roundabout, the exit from Anson Road onto the A12 and the introduction of a third lane as a slip lane onto the A14 westbound at the Seven Hills junction.

In summary we object to this application because the measures proposed to mitigate the large increase in traffic are not as extensive or wide reaching as are required.

### **Waldringfield Parish Council**

#### **Full consultation responses are provided as Appendix 6.**

4.38. *December response (Conclusion):* WPC supports the design changes shown in the Transport Assessment Rev 6 but objects most strongly to any suggestion that the A12 'T' Junction is not delivered at the start of the development.

4.39. *Initial response:* Objections are summarised as:

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)

### **Kesgrave Town Council**

#### **Full December consultation response provided as Appendix 7.**

4.40. *December Response (Summary):* At its Planning and Development Committee Meeting on the 13th December 2017, the Town Council recommended approval of the above mentioned, where voting was unanimous. This Council is aware that Martlesham Parish Council has not opposed the application because it accepts that a single allocation of 2,000 homes in this area forms part of adopted/agreed Local Plan. This Town Council would wish to support Martlesham Parish Council's major concerns, which mirror those of this Town Council, given its close proximity and use of Kesgrave's services and the shared infrastructure. These concerns relate to transport, healthcare and green infrastructure. Like Martlesham Parish Council, Kesgrave Town Council would wish to seek the best possible outcomes for existing and future residents through ongoing engagement with CEG (the developers), the LPA (Local Planning Authority – Suffolk Coastal District Council) and Suffolk County

Council Highways Department. Both Martlesham Parish Council and Kesgrave Town Council are seeking long term solutions to the A12 and local route congestion, as well as assurances on healthcare and local services. The Parish Council responded to consultation on a revised Transport Assessment during October. This Council, along with Martlesham Parish Council remain concerned that not enough is being done to mitigate against the impact of the additional population and its cars on the retail/business area and Felixstowe Road, the local “rat run”. This Council fully supports Martlesham Parish Council who continue to press for improvements, especially for pedestrians, cyclists and the less mobile. There are also concerns about the roundabout lane signage. With regard to the increased disturbance of the Deben Estuary SPA there are some concerns about the mitigation measures (i.e. the SANG) does not offset this. Apart from the two bird species mentioned there are several other birds that rely on the estuary that are on either the Red or Amber lists of conservation concern (see the RSPB website for these lists). There will be disturbance to many species that live on the estuary.

4.41. *Subsequent response to June consultation:*

Councillors received and noted the Report following on from Town Councillor Patten’s Meeting regarding air quality held on Friday 30th June at the District Council offices. Following the vote, the Committee agreed with Councillor Patten’s comments and recommendations. They noted that the proposed development at Adastral Park is that the junction at Bell Lane/A1214 be assessed for predicted levels of Nitrogen Dioxide in line with the recommendation contained within the Scoping Response from the District Council. (Full details within Councillor Patten’s Report). Parish Councillor Denton of Martlesham Parish Council invited a representative of the Town Council to join his meeting with District Council Officers in order to advance the Town Council’s understanding of the air quality modelling carried out for the planning application of 2000 homes at Adastral Park, Martlesham. Contained within the planning application DC/17/1435/OUT is the Updated Air Quality ES Chapter and Appendices prepared by Brookbanks Consulting Ltd (BCL). Within this Report are Table 6.10 and Figure 6.1. which are included in the Report for reference but should be studied in conjunction with the full Air Quality ES.

The Committee noted that the junction at Bell Lane/A1214 was not included within this Report. The Officer of East Suffolk Council Environmental Services is waiting for the updated Report from Suffolk County Council’s (SCC) Highways Department before studying the Air Quality ES in detail. The accuracy of the air quality modelling carried out for this application is dependent on the input of accurate traffic and congestion figures.

The Committee also noted that Councillor Patten has requested on behalf of the Town Council that the junction at Bell Lane/A1214 is modelled for any impact on air quality in line with the recommendation contained within Appendix B2 Scoping Response from Suffolk Coastal District Council’s Environmental Services Department which states “Essentially, but not exclusively, we would expect to see the following:..... impact of traffic from the operational phase on local residential receptors –particularly in Woodbridge

Town Centre and the A1214 through Kesgrave and particularly the junction with Bell Lane.”

The Air Quality ES for Adastral Park takes into account planned and proposed developments within the area of the planning application. The Committee noted that Councillor Patten has asked the Project Officer of the LPA to cross reference the air quality assessment for the proposed 300 homes at Bell Lane with the ES for Adastral Park to ensure consistency of the model used to predict future air quality in Kesgrave.

Councillors are aware that Parish Councillor Denton has requested that the air quality in Martlesham Heath be monitored at the points nearest to the A12. Parish Councillor Denton raised the matter of particulate matter PM10 and PM2.5, levels of which are not monitored by the District Council. One of the District Council Officer’s spoke of her previous experience working with Ipswich Borough Council and explained that PM10 and PM2.5 are monitored nationally and that outside an urban/industrial setting it was not considered necessary to measure local levels.(Copy of Notes of 30<sup>th</sup> June 2017 Air Quality Meeting in Minute Book).

4.42. *Following on from the Town Council’s Planning and Development Committee Meeting on the 8<sup>th</sup> May 2017, Councillors made the following comments and observations as an adjoining Parish/Town:-*

The Committee noted the Kesgrave resident’s objection for this development on the grounds of infrastructure, traffic flows and congestion and in particular relating to Grange Farm and the right turn into Dobbs Lane and the A1214, especially at peak times.

The Committee also raised its concerns regarding the proposed road access which is already heavily congested at peak times in particular at Bell Lane and Dobbs Lane. Traffic surveys need to be undertaken. Allocation of even more housing in this area will result in an even bigger unsolved transport problem. The cross-boundary transport issues to Kesgrave need to be addressed also. The routes in and out of Kesgrave and to Ipswich and other areas, are becoming even more congested without the addition of extra houses. Additional signals at key areas will not address the issues. It is hoped that the County Highways will be looking very carefully at the proposed scheme, to ensure that it is “fit for purpose”, robust and meets the County Council’s laid down requirements before any potential “sign-off” to the LPA. The Town and Country Planning (Development Management Procedure) (England) Order 2015 needs to be considered with regard to the highway issues. Public transport and health care infrastructure concerns were also raised. The Committee suggested that this proposal is postponed until the outcome of the housing needs assessment which will be published by the 12<sup>th</sup> May 2017 and also air quality assessments.

## Newbourne Parish Council

4.43. Newbourne Parish Council accepts the need for more housing and that this development will proceed however it has serious concerns over the roads in the area caused by an apparent complete lack of understanding by the planning / highways authorities. The area already suffers heavy congested due to nearby developments feeding onto the A12 via various roundabouts over a very short length of the A.12 truck road. The A12 is the counties main north / south route and subject to delays at the various pinch points currently created. Queueing is common place both on the A12 itself and in trying to access it at peak times / bank holiday periods. Some examples are Foxhall Road travelling east onto the A.12 tailbacks reach Dobbs Lane junction. When travelling north on the A.12 approaching Foxhall Road roundabout drivers can join the queue of traffic when halfway from Seven Hills roundabout. Future expansion of traffic serving Felixstowe container port and the Lowestoft / Yarmouth marine industry to accommodate the off shore energy development will both add to traffic flow along this route. This has greatly increased over very recent years with development on the industrial part of Martlesham Heath, with many new large retail outlets already in place and more being developed at a rapid pace. This adds greatly to traffic volumes caused by thousands of customers daily who attend these outlets. Staff also add to the problem as many premises do not provide off street parking and therefore nearby roads are rapidly becoming used for car parking, Martinsyde and Beardmore Park being typical examples. A few years back and they were completely unobstructed now cars have difficulty in passing through, buses and goods vehicles struggle. This added to the continued housing expansion in the Martlesham / Kesgrave area will only make a bad road network even less fit for purpose

The much talked about and badly needed northern bypass for Ipswich is also likely to require this section of the A.12 The planned road structure for the Adastral Park development will provide nothing to help in this area and could push the northern bypass further back or even into the bin. Ipswich becomes grid locked when the Orwell Bridge has to close due to accident or weather conditions and it looks like the suffering is set to continue. The current suggestions for highway development at this point acknowledges that delays and increased travel time will result but feel that they are acceptable. For those sitting behind a desk it may be, but for regular road used it is not. Delays and queuing traffic have down sides, delays cause additional costs. More importantly queuing traffic has a serious impact on air quality which is already poor in many parts of this country and clearly at this heavily populated location is set to deteriorate further.

The proposed highway alterations are inadequate and at times unbelievable. The idea of a horse crossing serving the bridle track at Brightwell is one example where one can only wonder how this ever got serious consideration. There is doubt that horses cross at this point, which makes the cost questionable and the logic suicidal for horse and rider. It is like suggesting a viewing area is provided on the Orwell Bridge for pedestrians. Slip roads providing access to and from the A.12 with under or overpass facilities are

what is needed not just for now but with the future growth around this area. A good example of access without causing stationary traffic is the modified exit from the A.12/A.14 roundabout coming from the Orwell Bridge when turning left onto the A.12 where the nearside lane is used as a slip access to the A.12. However this lesson was totally ignored in two aspects at Copdock Mill interchange even when recently redesigned.

There are long tailbacks of traffic queueing to turn left onto the A.12 south for London when travelling from the Orwell Bridge. Secondly coming from London approaching the roundabout many wish to turn left onto the A.14 for Bury St Edmunds. All this traffic is required to approach the roundabout and is controlled by traffic lights. In both cases a slip road leading off to the left and providing access to the intended route of travel would have meant unimpeded traffic flow. The obvious benefit of this would have been less pressure at the controlled roundabout and less delay and air quality pollution. There is now a chance for a far better system than has been proposed for this planning application, if the public purse cannot fund it then the developer must accept greater financial input, after all it is this which is creating the problem. Please don't sanction what will be a curse on the Ipswich area particularly for those close to the location.

#### **Woodbridge Town Council**

- 4.44. Woodbridge Town Council's consultation response in December 2017 stated: "We recommend Approval". Previously they had recommend refusal.

#### **Rushmere St Andrew Parish Council**

- 4.45. *December response:* Recommends REFUSAL. The additional information and revised transport assessment do not address previous concerns raised on 11 May 2017 regarding site access and the traffic impact of the proposed development on the surrounding area.
- 4.46. *Initial response in May:* Recommends Refusal of this outline proposal in consideration of site access based on the following observations:-
- There appears to be little or no consideration for the expected increased traffic flow through Rushmere St Andrew at Foxhall Road and the A1214. Shaving a sliver of between 0.3m and 1.0m (depending on roundabout) off the kerbside footway width will not solve or reduce the already highly congested traffic queues at St Augustines and Bixley Road/Foxhall Road roundabouts.
  - The proposed improvements at the Woodbridge Road gyratory roundabout would marginally improve traffic flow at current levels, but this roundabout requires the removal of the traffic light controlled pedestrian crossing to make it an acceptable interchange point on the Ipswich feeder route. A pedestrian bridge (with ramped rather than stepped access) crossing both the A1214 and the feeder section from Colchester Road/A1071 is required for effective traffic flow.

- The Boulevard T-junction access point from the A12 onto the new development would be totally unsuitable for current traffic levels let alone the extra traffic movements generated by the completion of the projected development. We estimate that even at current rush-hour levels the provision of traffic lights at The Boulevard would create queuing back to the Foxhall Road and BT/Eagle Way roundabouts. A better solution would be with no traffic lights at The Boulevard but slip roads linking to the A12 for both entry and exit. Traffic wanting to exit right from The Boulevard would slip left and then round the Foxhall Roundabout whilst traffic wishing to turn right from the A12 into The Boulevard would turn right round the Eagle Way/BT roundabout then slip left into The Boulevard. This would ensure traffic flows smoothly along the whole length of the A12 at this point and around the proposed increased number of roundabout lanes.

#### **Buckleham Parish Council**

- 4.47. Buckleham Parish Council have no comments to make regarding this application at this stage of the planning process.

#### **Melton Parish Council**

- 4.48. It was resolved to recommend approval of the application, as Melton PC Planning and Transport Committee considers the application to be in line with the National Planning Policy Framework, the Suffolk Coastal District Council Local Plan Core Strategy and Development Management Policies. However whilst Melton councillors are supportive of this application, in the context of the wider needs of the greater Woodbridge area, they have expressed a view that approval of this large development should be subject to the phasing of new educational provision, healthcare and transport infrastructure in tandem with the growth of the new community.

#### **Kirton and Falkenham Parish Council**

- 4.49. Kirton and Falkenham fully endorse SCC Councillor Patricia O'Brien's letter to you dated the 25<sup>th</sup> May 2017, objecting to the Planning Application (DC/17/1435). The Parish Council is particularly concerned about the cumulative effect the traffic will have on this combined residential, industrial and retail area, all of which are growing. The developer's mitigations seem totally inadequate and the reassurances totally unconvincing. The application should be referred to an independent inspector.

#### **Hemley Parish Meeting**

- 4.50. Object for the following reasons:

The village accepts the fact that many new houses are needed, but feels that the present proposals, for a virtual new town on what is a Greenfield site, to be



totally out of place. However we have no objection to employment development on the existing BT site.

1. Proposing to build 2000 new houses, in the countryside, adjoining an AONB, including an important area of the River Deben, seems to us to be contrary to all ideas of protecting outstanding countryside and wildlife areas.
2. The roads servicing such a proposal and those leading to nearby villages are totally inadequate to cope with the existing traffic, particularly during the morning and evening rush hours and summer season, let alone that generated by an extra 2000 houses.
3. In the past, over several years, whenever planning permission has been granted for the extraction of minerals on this land, the SCDC has made such consent conditional on the land being returned to agricultural. Surely that condition should take precedence over current proposals.
4. More suitable areas for residential development, for example, such as the "Brownfield" former Ipswich sugar beet factory site, admittedly in an adjoining council's area, have been unused for very many years and should surely be developed before using open countryside.
5. The wishes of local people, we are told, must be taken account of in any such development and the past strong objections, mounted to this scheme, indicate that an attempt to push it through is contrary to this intention.

In view of the objections, raised in the past, bot by the surrounding Parish Councils and Meetings, together with very many local residents, we trust that this application will be refused.

#### **Suffolk County Council – Ward Member Martlesham Division - Councillor O'Brien**

##### **4.51. *Final December response:***

I trust that this will not be the final Transport Assessment as I find that the issue of capacity has not been addressed. Theoretical assumptions by Brookbanks – Development Consultants, do not accept that upgrades and improvements will be needed if their scenario fails.

SCC have a problem with the planning conditions relating to road safety and recommend that improvements could be subject to alteration under Section 278 Agreements. The Applicant considers this "both unsound and unlawful". I am perplexed that such a reasonable and obvious scenario should be regarded as unlawful. It is common sense to review improvements, especially as the consequences of such a large development on the road system is uncertain.

The Applicants reluctance to accept signalisation at junctions Foxhall roundabout and Adastral Park roundabout display a breath-taking arrogance. Their prime concern is that signalisation will cause delay and interfere with A12 capacity. Agreed. However, the A12 is certainly up to capacity at present, especially at peak time and the addition of 4,000 extra cars, from the development, will naturally, cause delay and congestion. Traffic lights and increased road capacity at roundabouts will be of limited, but necessary help.

However, in order to preserve flow and reasonable journey time, the solution is not to build 2,000 houses in an area that has capacity issues already!

Finally, a major concern that has not been addressed is the effect the inevitable increased traffic will have on the minor roads and villages in an Area of Outstanding Natural Beauty. We are all aware that drivers seek the easiest, quickest route to their destination. If roads are congested they will use side roads and lanes to the everlasting detriment of our beautiful countryside.

My words, in this paper, do not supersede my many previous submissions, over the years, in relation to planning application DC/17/1435/OUT . I would wish to see all my comments put forward to the SCDC Planning Committee for consideration.

*October response:*

This letter is in addition to that written on 8<sup>th</sup> May 2017 and concerns the updated Transport Assessment. These are my comments.

The Assessment states, understandably, that a development generating a significant amount of movement should be supported by a Transport Plan, a Transport Plan that 'positively' contributes to "Reducing the need for new development to increase existing road capacity or provide new roads". (3.7)

I find the above statement hopelessly naïve, especially when (3.31) admits that "According to the traffic model it is anticipated that level of traffic growth is likely to grow by 15% by 2021. ( said development due to complete 2029!) This could cause additional pressure on the A12/A14 at Copdock, Seven Hills interchange and the Orwell Bridge". The effects this area already endures, due to the present levels of traffic, is considerable and a 15% increase would mean gridlock, especially during rush hour and days end for schools.

What is envisaged in reparation? (3.13.) states.... " it may be possible to free up additional capacity within the road network".. I ask, what capacity, what network?

4.23 advises the use of Woodbridge train station for commuters. However, Woodbridge station only has 72 car parking spaces.

Reducing the speed limit along the A12 is offered. This rather suggests that there will be a large increase in traffic.

The proposed phased approach to the development is signalled as ensuring additional congestion "is unlikely to occur" (6.10) I would absolutely refute this. To believe, that traffic emanating from newly built houses will not add to congestion, demonstrates the ignorance of the consultant.

The paper argues, at great length the assumption that the inhabitants of Adastral Park will prefer walking and cycling to the use of their car. Perhaps

20/30 years ago mothers might have walked to school with their children but in today's world many mothers are working. That their business would be within a 2km walking distance is fanciful and unrealistic. That shopping could be done on foot or by cycle is, again, unrealistic; much shopping is done on-line, which mean deliveries, by car. Cars are necessary for everyday life to evolve.

3.10 states..."that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe". I would contend that the increase in traffic that will invariably result from this development will have severe consequences now and for the future.

People, in my division, are appalled by this development and fail to understand SCDC's logic in pursuing such an environmentally damaging proposal. A proposal that will have a detrimental and everlasting effect on the AONB and forever change this enchanting corner of Suffolk.

With the growth of Martlesham retail, a further 2,000 houses and hundreds of other new build in close proximity, what solutions are offered to alleviate the traffic in these proposals? - The road traffic situation at present is constant throughout the day and particularly frustrating at peak times.

p.34 mentions "that impacts on the highway network have been tested", but fails to state what they are! How can one judge the benefit of the tests? There is a noted failure to address the impact of the frequent problems on the Orwell Bridge. When the Orwell Bridge is closed chaos reigns and Ipswich and surrounds are gridlocked. I find the proposal to install a pedestrian/equestrian crossing across the A12 amazing. The Right of Way that exists at this juncture has never been put into use. Suddenly, this is named as the reason to install a crossing with provision for horse riders. One can imagine the incomprehension of motorists. If a crossing, from Adastral Park to Martlesham, is required then a footbridge is surely the answer.

I remain totally opposed to this ruinous development; ruinous to the area and the road network. This part of Suffolk Coastal has considerable riverside attractions that retain beauty and peace. This will be shattered by the impact of potentially large numbers of visitors on places that have limited resources to cope. This development will extend the boundaries of the urban into the rural and quality of life for this outstanding piece of Suffolk will be lost.

*Initial response:*

SCDC Planning department will be very much aware that I have objected to the above development, as both district councillor (Nacton Ward until 2015) and county councillor (Martlesham Division), since its inception in 2008. In the past I have had sufficient time to respond. However, the present consultation, the most fulsome, has been given during two bank holidays,

including Easter, and the county council elections, in which I have stood for re-election. Thus, there has been little time for me to give due consideration, as I would, under normal circumstances. Please note my dissatisfaction.

My objections remain the same. I have attached copies of letters and speeches at SCDC Full Council and Cabinet that clearly state my past and present dissent. Further, I wish to comment on the current proposals. I object to the high density and height, 3-4 storeys, proposed in the primary and secondary local centres and A12 gateway. The height will visually impact on the nearby village of Waldringfield and the surrounding AONB. Waldringfield expresses a concern, which I share, regarding the Western Access secondary route on Ipswich Road. It is suggested, in the application, that Western Access should only be used during construction and could be removed after construction. Waldringfield are of the view that it should be removed from the application. This would be a firm indication that Western Access would not remain. I find it highly optimistic that the inhabitants of Adastral Park will either walk or cycle to shops, businesses, schools etc, The Design and Access Statement goes to considerable lengths to promote a picture of walkers and cyclists. Society has changed much in the past 10 years and women are at work rather than home. Thus a second car is needed, plus a third for a young adult. 2,000 homes will require space for at least 4,000+ cars. Roads and parking on site need to be generous.

### **THIRD PARTY REPRESENTATIONS**

- 4.52. 102 letters, emails and on-line comments raising objections have been received from residents in the local area. Some contributors have responded with more than one letter/email.
- 4.53. Two letters of support and six letters/on-line comments making neutral comments have also been received.
- 4.54. One letter from a local resident's group named No Adastral New Town (NANT) has been received in objection. That letter is provided in full at the end of this section.
- 4.55. The **supporting** comments received can be summarised as:

Summarised comments below are quoted from the contributor's perspective and are not an interpretation by officers.

- The development would not be a precedent for further ribbon developments along the A12 south of Melton.
- CEG's intentions to promote walking and bicycling within the development and along the local footpaths and bridle/cycle ways near the site are wholeheartedly welcomed.
- A community bus could be provided serving the development and surrounding area.

- While the Deben's flora and fauna (as recognised by SPA,SSI and Ramsar status) must be conserved, it may be noted that some 191,000 people live within 14 miles of the Maybush.
- Any reduction in the density that will lead to more land being taken elsewhere in the vicinity for development would be opposed.

An email of support has been received from Flagship Group (a Housing Association) in relation to the delivery of affordable housing on the site. They are not a consultee so this is treated as a third party representation.

4.56. The **objections** and neutral comments contain the following comments, which have been extracted and summarised into the following themes:

- Principle of development and Infrastructure
- Housing
- Highways
- Ecology/Bio-diversity, Green Infrastructure and Landscape
- Environmental Effects
- Design and Layout of the Development

Summarised comments below are quoted from the contributor's perspective and are not an interpretation by officers.

#### **Principle of development and Infrastructure**

- Most local residents in Kesgrave, Martlesham and surrounding villages are opposed to this development especially one on this scale and the misery it will bring to motorists.
- This will put so much pressure put on our infrastructure, hospital , G P. surgeries, roads, schools, water, sewage, it would be a disaster to completely wreck this area for existing residents.
- The site is just not large enough to be a self-contained 'village'. The publicity images distributed by CEG show that the 'artist' giving impressions has no conception of real scale and it is not realistic to include all the facilities indicated, only mockeries of them.
- The development should be located to the north of Foxhall Road and not divorced as it is from existing urban area.
- At least half the number of houses should be re-allocated in small blocks across the county where existing schools, shops etc. are struggling.
- Is it valid for CEG to proceed with this matter while it is before the Court in Strasbourg?
- Any public opinion sought by SCDC has been routinely ignored, side-lined or short circuited by procedural process.

- There is no need for housing on this scale in this area and nor are there the jobs sufficient to justify it.
- The proposed development is too large. It would dwarf and have an adverse impact on adjacent communities.
- The development will set a precedent for development of Waldringfield Golf Course.
- Better use must be made of brownfield sites closer to transport links.
- Suffolk Coastal District Council, refused to allow the Martlesham Neighbourhood Plan Area to include the application site. It is therefore unreasonable for the applicant to place emphasis on the integration of the new development with existing facilities.
- Schooling and other infrastructure proposals all seem to be under-provisioned or ill-conceived for practical realisation in the outline plan.
- No thought as to budgeting for a Police presence on the development.
- The need for new housing should not be at the expense of the quality of life of the existing residents who have chosen to live in a peaceful area and on whom the present proposals will have a negative impact.
- The impact on Waldringfield seems to have become irrelevant in this proposal, despite holding public consultations little heed has been paid to concerns expressed.
- The provision of good quality education including provision for a secondary school should commence in the first phase to ensure all children in the catchment area get into their catchment school.
- The public has never been meaningfully considered during this process.
- The development would depress the local house prices.
- The hospital is unable to cope with the existing number of patients and no improvements to any infrastructure have been planned.
- How are you going to provide adequate water for all the extra houses, in an already dry area?
- The development does not currently promote good connections with adjacent sites which may come forward for development

## **Housing**

- There is a lack of commitment to providing adequate affordable housing and no reference to any special needs housing including older people sheltered or care homes.
- There is no mention of whether there are plans for 'Lifetime standard' housing and there should be a strong emphasis on accessibility throughout, in all properties.

- There is no massive demand for housing. Every week in the local paper there are many hundreds of houses/flats for sale/rent at all prices. Youngsters should share rented accommodation with others to make it affordable.
- It is unlikely that this will house the 170 families on the priority housing list.

## Highways

- The area will become massively congested and polluted with excessive traffic.
- The proposed works to the highways should be done first to allow the increased traffic to flow adequately as this is already a congested area especially during peak travel periods.
- The A12 carries sufficient traffic already to make it difficult at times to get out of Martlesham Heath and Tesco roundabout due to the continuous flow of traffic.
- No consideration is given to the impacts of the housing allocations in the Felixstowe and East of Ipswich Area, the construction of Sizewell C and the Felixstowe Port expansion.
- No attempt has been made to assess the impact outside the study area and on the minor roads such as Newbourne Rd and Ipswich Rd. These are serious omissions.
- It is astonishing, that no traffic survey has included the impact on Waldringfield.
- Traffic Modelling uses assumptions and also predicts human behaviour, and therefore cannot be relied upon. Why aren't the modelling scenarios extended beyond 2027?
- Why is BT and Barrack Square traffic omitted from the Transport Assessment study area?
- Any junction into the site must be a full roundabout similar to existing Tesco, Eagle way, Foxhall road. Traffic lights will cause vehicles to queue, increase existing car journey times and significantly increasing traffic pollution.
- This development needs underpass/overpass junction control to allow any sort of smooth traffic flow. The traffic hold ups from traffic lights at the four roundabouts will be horrendous. Any proper traffic survey would show that.
- The area is suitable for development, but must object to the traffic mitigation measures and site access traffic light junction that will make the current situation far worse.
- Putting traffic lights on the A14 / A12 junction will not be sufficient. As there are already one mile tailbacks to the first bridge towards Martlesham. This junction should be made into a full clover leaf junction.
- Why are there no traffic lights at Seven Hills for traffic coming out of old Felixstowe Road?

- Would you consider putting traffic lights at the BT and Tesco roundabouts so that Martlesham Heath residents may be able to get onto the A12?
- The project is generally acceptable, except for one aspect, please, no traffic lights.
- It is very difficult to turn right out of side roads in Kesgrave onto A1214 because of the volume of traffic now; mini roundabouts are required now at each side junction.
- The minor roads around Waldringfield and Martlesham will be used as a rat run to bypass the traffic chaos that will be created- these roads are totally unsuitable for such traffic volumes that will follow.
- The vehicular access point leading onto Gloster Road will lead to complete traffic chaos on the already clogged up roads around BT and Tesco's.
- The BT site will revert back to one Entrance/Exit and will likely revert back to 1990's levels which nearly brought gridlock to the Gloster Rd and BT roundabout not just at peak times but when ever BT held an event.
- There appears to be no acknowledgement of the Ipswich Northern By-pass study, and the associated effect on the on the A12.
- This development would make a northern Ipswich bypass essential, are CEG paying for that? If not then they should be.
- The accesses from Ipswich-Waldringfield road are totally impractical. The road is barely wide enough for an HGV and car to pass and has dangerous bends.
- Nothing less than the upgrade of the Ipswich road to Class A standard and the Foxhall roundabout to near Motorway standard with underpass for A12 would cure this.
- Widening of roads only proves to be a short term relief, it is better to reduce speeds.
- The suggested left filter exit lane from the A12 to the Ipswich Road will eliminate the window of opportunity for vehicles from the Waldringfield direction.
- The proposed new junction on the A12 should be opened up before and used instead of the western access point on the Ipswich Road and phase 1 access should be mainly from A12.
- The second access point near Brightwell Barns is unnecessary and should be cancelled. Decreasing usage of this road is insufficient, unnecessary and unlikely to be enforced.
- The proposed highways works will require public funding in the future for upkeep which is already short in supply.
- There needs to be more footway crossings east-west across the A12.
- Why not build a foot tunnel under the A12 using the gap between Lancaster Drive and Coopers Rd Martlesham Heath linking the new town.



- A light controlled Pegasus (horse) and pedestrian crossing, is potentially dangerous.
- This bridleway does not link up with any other footpaths or bridleways at its eastern end.
- An underpass would be the most suitable and safe option for a crossing on the A12 for horse/pony and riders, cyclists and pedestrians.
- Although expensive, there must be a footbridge for pedestrians and cyclists.
- More off road dedicated cycle paths required, not just within the development but also connecting it to Woodbridge, the Martlesham Heath network and Ipswich town centre.
- Has any thought been given to using the old A12 road (where the mobile café is) as a direct link between the village and the Foxhall roundabout?
- A restriction to 30mph along Ipswich Road is much more likely to reduce speeding and deter rat-running than one of 40mph. Effective enforcement of the speed limits is essential.
- A 40mph speed limit should be implemented, and extended as far as the Heath crossroads, and a 30mph speed restriction should be continued into Waldringfield.
- Making the whole stretch of A12 50mph would help ease the difficulty of getting off Martlesham Heath by slowing the approaching traffic. At the moment people approach the roundabout at 70mph, slowing little for the roundabout.
- A speed reduction on the A12 from 70mph to 50mph is ridiculous and will add to frustration for drivers.
- The Martlesham shopping area is already saturated with traffic at peak times and parking is a nightmare.
- The lack of public transport and safe cycle paths leaves residents of this area little choice but to use a car.
- The National Cycle Route is already unsafe for both pedestrians and cyclists because of the volume of both types of traffic, particularly at peak times, its narrowness and because a sharp bend results in a lack of visibility of the route ahead. This deficient National Cycle Route should not militate in favour of the granting of the application.
- The southern junction on Ipswich Road is in a dip in an area with limited visibility in both directions. The area is frequently flooded and there is often quite a bit of sand on the road in this area washed down by the rain. The Northern access is not seen until quite late when approached from the Waldringfield direction because it is set below the brow of the hill. It would be totally unacceptable to direct all of the traffic out of these accesses.
- It is not clear when quarrying activity will cease. If it continues once the school is operational this would lead to lorries from the quarry still using the Ipswich

Rd Eastern Access near the restricted visibility hill brow alongside school related traffic, with all the implications for congestion and safety, not least of schoolchildren.

- Investigation should be made into providing a shuttle bus service between Waldringfield (and Newbourne) and the services within the development or the Park and Ride site.
- This area has many rural pursuits, e.g. horse riding, walking, dog walking, cycling. The additional traffic generated by this proposal would be to the detriment of these activities, and significantly add to their danger, and no doubt turn people away from these pursuits in this area.
- The arteries leading from the new development site all need upgrading not just the junctions.
- Why is there off-site highways mitigation beyond the Martlesham area but little or no mitigation proposed for some parts of Martlesham?
- Inadequate road access from the A12 to the central areas of the site will compromise the Fire Service's ability to meet their response time commitments.
- Increased traffic flow on Ipswich road will be problematic for the junctions with Newbourne and Brightwell. Please also request a Road Safety Audit on the Newbourne & Brightwell (Ipswich Road) junctions in relation to the increased traffic flow from the development.
- Foxhall Tip entrance may need traffic lights also due to peak use queuing.

### **Ecology/Bio-diversity, Green Infrastructure and Landscape**

- The number of homes is drastically incompatible with the area. Traffic and pollution would devastate the surrounding AONB.
- The light, noise pollution and site screening elements are being 'glossed over'. As is the funding that is required to mitigate the impact this New Town is going to have on the surrounding villages and the countryside and the AONB.
- A 30 metre, not 20 metre wooded buffer is needed on the south boundary, so that as we drive out of Waldringfield we are not faced with a sea of houses. The screening for the development, particularly from the AONB does not appear to be adequate. The depth of tree planting and the scale is not sufficient to provide an effective screen.
- The mature trees bordering the Ipswich Road should be protected.
- Not enough information has been given as regards the proposed tree planting around the site.
- The area provided for allotments is insufficient. The allotments should be centrally located
- Existing bunds should be retained as part of the open space.

- Heathland will take a long time to establish with areas fenced off while it establishes. Green infrastructure is all in one place and should instead form wildlife corridors.
- This wood is intended to be 'sensitively managed'. However a play area has been placed in the centre of it. It is not a suitable location. Play areas need to be observable and play equipment provided for different age groups. Also there is a need to keep dogs out of play areas.
- There would be adverse impacts on nearby wildlife sites in particular the Deben Estuary due to the inevitable additional use made of the area for recreation and visits by an additional 2000 households.
- The increased pressure and close proximity of such a large development to the River Deben, an SPA site, would suggest a proportionally significant amount of mitigation funding should be allocated and earmarked specifically to protect against the impact of this massive development on an important natural resource.
- The comments submitted by Natural England are not agreed with about minimising disturbance to the River Deben. There is a need for local people to have access to wild places, rather than being fenced inside their 'compound'.
- The amount of greenspace being provided is significantly less than that presented to the Planning Inspector in the External Examination in 2012, and used as the basis for approval of the Core Strategy. No explanation has been given for this discrepancy, or why an occupancy rate of 1.57 people per household is still being used in the calculation of the amount of SANG, despite its obvious flaws.
- The reduction of mitigating green space from 53 hectares to 34 hectares by CEG has been done without due consideration to the objections given by the local community (the 53 hectares falls far short of an earlier requirement by SCDC's LDF that there should be green space equivalent to that provided by a new Country Park to be situated close by).
- No details of off-site mitigation are given in relation to recreational impacts on the estuary.
- Otters have been seen in the lake and would be lost as a result of the development.
- The proposed development is very dense with minimal public open spaces. There is a central area of open space, but it is around the big lake which they can't build on anyway. The other open spaces are sports fields and the school, which can't be classed as public.
- Sharing sports space with the school is probably difficult due to security. There needs to be separate provision.
- The implication that the SSSI at Martlesham Heath, and its status as Access Land under the Countryside and Rights of Way Act 2000, is being adduced as partial mitigation for the Adastral Park Development is unacceptable. While current usage levels are tolerable, a significant increase in usage will risk the

undermining of the condition of the site, and as the lessee, Martlesham Heath SSSI Ltd., and/ or Martlesham Heath Householders Ltd. could face penalties imposed by Natural England. The developer to contribute towards the upkeep of this land.

### **Environmental Effects**

- There is a lack of information on surface water drainage in this application as there appears to be no details as to how this will be addressed
- Air Quality - no monitoring receptors were put, or are scheduled to be put, in the Deben area for either construction or operation phases of the development.
- The new development will have noise reduction barriers for residents of the new development. What will be done for the existing residents of houses close to the other side of the A12 who will experience the same levels of traffic noise?
- The A12 from the Foxhall Road roundabout to the Black Tiles roundabout should be resurfaced in a noise-optimised surfacing to reduce the already unacceptable noise levels.
- Given the flash storms which are now increasingly frequent it will be vital to plan for sufficient surface water drainage from the 2000 houses and associated buildings and roads.
- Careful planning to install lighting within Adastral Park to avoid lighting pollution is crucial. No amount of trees will contain the aura of light if the direction and height of lighting is not carefully controlled.
- The development should have a lights off policy after 11pm/midnight for instance, with a possible exception to the main 'hub'. This also has the added benefit of reducing energy consumption. There should be no street lighting outside the houses on the perimeter of the development.
- Newbourne Road and the villages which it serves should also be protected from noise and light pollution by the planting of a large, mature woodland on the edge of the northern part of this road.
- The surroundings of the building site have many springs, streams and SSSIs. Controlling the run-off from all the tarmac, roofs and concrete is essential to the health of many human water sources as well as natural habitats.
- What will be done to monitor the pollution levels from the A12 and ensure these levels are not increased? What is the planned mitigation for ensuring a acceptable quality of air in the surrounding area?
- Water and wastewater /sewage are already at full capacity in this area - information provided does not fully indicate how the requirements of all these extra houses are actually going to be met.

- Surface water run off currently it mostly runs in the direction of Newbourne Springs and Nature Reserve. The drainage system must be built to take sudden 'storm water' for if it is not adequate it will all run off the town roads into the local freshwater catchment area and waterways. Those town roads will be polluted by car oil leaks and petrol spillages and by on street car washing detergents.
- The terrain is notoriously unstable due to past landfill.
- The eastern boundary bund should be retained during construction to reduce dust and noise.

### **Design and Layout of the Development**

- Concern is raised about the density of the development and the building's closeness to the A12/road networks.
- There appears to be no reference to the needs of people with disabilities yet a significant proportion of residents will have some form of disability.
- The 'boulevard' is reminiscent of suburbia of Milton Keynes and should instead reflect the rural area.
- The estate roads should have traffic calming surfaces - not bumps but change of colour, surfacing and texture to give priority to pedestrians throughout the site.
- Can the BT test range building not be retained as an historic building?
- The indicative design style indicated in the CEG proposals which suggests replication of the existing worst monstrosities that developers have inflicted on the area.
- It is not clear where the proposed "high- rise" buildings are to be sited. They should be concealed in the centre of the development.
- The proposals include a 'sports area' and cricket ground, but there is no provision for the associated parking, or changing rooms and storage, that a general sports area would require. A cricket pitch would only be used for a few months of the year.
- The parking spaces for the school and retail areas seem to be insufficient.
- All in all it looks like a bland development, with as many houses crammed in as possible and with little thought of making it a pleasant place to live.
- There is no evidence of a pleasant well designed village centre. Room for small shops, restaurants, maybe another place of worship.
- There seems to be no mention of the 'Merton rule' that a high proportion of the power needed in the site dwellings be generated on site - PV panels etc. This is on the basis of reducing the impact of climate change.
- The adjacent Martlesham Heath housing area should be a template for the development. Martlesham Heath has been held up as an excellent example of 'new village/housing layout'.

#### 4.57. **Letter of objection received from No Adastral New Town (NANT)**

Consultation response from Janet Elliot on behalf of NANT to register our OBJECTION to the current application for the following reasons.

##### 1. Access Points to the development

i) We are very concerned that in all of the documents of this outline application the proposed Ipswich Rd Access Points have been changed from the “Two secondary access points proposed on the Ipswich Rd” as was stated in the Draft Masterplan, Key Local Highway Improvements map) to become two “Priority Access/Primary Roads” that will connect to the main boulevard and will be the main road access for the central area. They will be operational from the beginning of the construction.

ii) This change has been made despite many members of the public expressing serious concerns about the negative impact that two “secondary access points” on the Ipswich Rd would have on the safety and well being of existing users of this narrow, twisting rural road, notable for its hidden dips and blind bends. A singularly unsuitable road to accommodate all of the heavy-duty construction traffic and equipment and much of the subsequent traffic generated by new residents on the development.

iii) The argument made by CEG at the public exhibitions was that these two secondary access points were needed during construction in order to satisfy the needs of the individual builders. Prior to the outline application coming forward, CEG indicated that at some point in the near future, the Western Access point can be downgraded. Details and timings were unspecified, although of course these discussions were predicated on both the Ipswich Road Access Points being already “secondary”

We therefore object strongly that the planning application identifies the two access points on Ipswich Rd as priority access/primary roads.

iv) We see no justification for an Ipswich Rd Western Access route in this application. A far more appropriate option would be to have the proposed new junction on the A12 fully functional before any construction works starts on the development giving construction traffic access directly off the A12, through to the main boulevard. This would be in addition to the Ipswich Rd Eastern access route. This would help a little to alleviate residents grave concerns about the impact of all the construction traffic for the early phases using the quiet and narrow country road that is Ipswich Rd with no alternatives in place and thereby failing to ensure highway safety.

v) Should the LPA be minded to permit two access points on the Ipswich Rd, they should be identified and treated as secondary roads within the outline application. Furthermore the treatment needed to downgrade the Ipswich Rd Western Access and the timing of this downgrading – before phase 2 construction starts - should be agreed and be included in an amended outline application, or at the very least be the subject of robust and detailed planning conditions. We would suggest that downgrading to a non-vehicular access point would be the only effective option.

We therefore object to this application as it does not contain the details of downgrading the Ipswich Rd Western Access

## 2. Off-site transport issues

### a) Treatment of Foxhall r/about - drawing 10391-HL-22

vi) The Ipswich Rd approach to Foxhall r/about currently carries traffic mainly from Waldringfield and neighbouring rural villages. Phase 1 of the development is 450 households, and phase 2 will take household number to approx 1000. This will result in a huge percentage increase in traffic. Ipswich Rd currently has 2 lanes at the entrance to the r/about so turning left is quite easy. To turn right or straight on you have to wait for a break in traffic on the A12, usually created by vehicles turning into Ipswich Rd - the A12 is currently 2 lanes and which can be difficult at busy times.

vii) On the new plan the A12 has a turning left filter lane to turn in to Ipswich RD and 3 lanes of traffic going around the r/about. This means that if you want to go straight on or turn right from Ipswich Rd you would have to navigate 3 lanes of fast moving traffic in order to enter the r/about this would be extremely intimidating and very difficult for most drivers.

viii) We think that further studies by CEG, SCDC and SCC should be conducted on this to seek an alternative with particular regard to accessing this r/about from the Ipswich Rd and also Foxhall Rd.

We therefore object to this application as the proposed treatment of the Foxhall R/about will not enhance road safety, in fact it is likely to contribute to an increase in traffic accidents and will not mitigate the impact of the Adastral Park development.

### b) Journey time modelling

ix) We question why, when assessing the impact of the development on journey times, the impact on the journey times out of Waldringfield and neighbouring villages via Ipswich Rd have not been assessed, when this is the route most impacted upon by the development in increased percentage traffic terms. The same applies to the other minor roads around the development that are going to be affected by increased "rat runs".

## 3. Treatment of the "buffer" greenspace at the SE corner of development site

x) The application contains insufficient detail regarding tree planting, the maturity of new planting etc., nor does it give sufficient detail on the phasing of such planting.

xi) We would suggest that the application should contain these details as the planting should be completed before construction on Phase 1 of the development is started in order to minimise the visual impact from the AONB and make a smooth transition from an urban to rural landscape.

## 4. Mitigation requirements, both on and off site to prevent harm to the Deben SPA from increased visitor numbers

xii) The BT application, relied on by SCDC in the Core Strategy, the SAASP and the relevant EIPs included 53 hectares of on-site mitigating greenspace - the

CEG application provides a maximum of 34 hectares of on-site greenspace. Apparently this reduction has already been agreed with NE and SCDC.

xiii) Although the amount of mitigation was discussed at some length at the EIPs, SCDC, unlike IBC, did not quantify in its Core Strategy the amount of on-site mitigating greenspace needed for its strategic housing allocation.

We consider this to be a serious omission on the part of SCDC, but it is perhaps not a matter to be raised in this application consultation. SCDC is of course aware that the legal challenge brought by NANT is now with the ECtHR and we all await that court's ruling.

xiv) However, the Core Strategy SP20 does state that the mitigation required is as defined the AA of Nov 2011, section 7.2 and table 10 and therefore, as a minimum, the following off-site mitigation measure are required from the Adastral Park development – “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”

xv) The outline application gives no detail of off-site mitigation provision or funding but does refer, in the Environmental Statement volume 1, pages 8.50/51, to funding being provided through the emerging Recreation Access Mitigation Strategy (RAMS)

– this does not carry much weight as the publication of this RAMS is behind schedule and is not in the public domain.

xvi) The issue is that there is no reference to the scale of funding contribution to be made by CEG and what will be the criteria for distributing the collective S106 monies. We see no reason for regarding this information as commercially sensitive in any way. Mitigation was, and is, such a critical element of the strategic housing allocation and in turn, this application, that it is essential that the off-site mitigation funding details should be included in the outline application.

xvii) Given that Adastral Park is the largest development in the district and the nearest, by far, to a designated SPA, the Deben, we need to have assurance that equivalent funding to that identified in the Nov 2011 AA/BT application is going to be provided by CEG and the money spent on mitigation will be in proportion to the scale and proximity and therefore potential negative impact of this development on the internationally protected areas.

We therefore object to this outline application as there is insufficient certainty or clarity regarding the essential provision of off-site mitigation.



## 5. PLANNING POLICY

### 5.1. Legislative Considerations

#### *Planning and Compulsory Purchase Act 2004 (as amended)*

- 5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 2004 in conjunction with section 70(2) of the Town and Country Planning Act 1990 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise.

#### *The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (EIA Regulations).*

- 5.3. The planning application is accompanied by an Environmental Statement. Officers and the Council's legal Counsel have reviewed the document and consider the Statement complies with the requirements of Schedule 4 of the 2011 Regulations (Information for inclusion in Environmental Statements).
- 5.4. Since the submission of the application the EIA regulations have been amended by a May 2017 update. As an EIA Scoping Opinion was provided prior to changes and the application was also submitted prior to the changes, it is the 2011 regulations which apply to this development.

#### *The Conservation of Habitats and Species Regulations 2017*

- 5.5. Given the location of the various European designated nature sites in the District, consideration has been given to the application of these Regulations. If a plan or project is considered likely to give rise to significant effects upon a European site, Regulation 63 requires the decision maker to make an 'appropriate assessment' of the implications for that site before consenting the plan or project.
- 5.6. The application was submitted with consideration given to the 2010 regulations as the 2017 update became legislation on 29<sup>th</sup> November 2017. Amendments to the Habitats Regulations 2017 do not reflect any changes to relevant policy or procedures and the submission and the Council's appropriate assessment are therefore not altered by this update to the regulations.

#### *The Wildlife & Countryside Act (1981)*

- 5.7. This is the main legislation for protection of wildlife in Great Britain. The Act deals with protection of wildlife. Species are offered varying levels of protection by the Act under different schedules. Protected species are present on the site and therefore this act must be considered in relation to the impacts of the development and the mitigation proposed.

#### *Countryside and Rights of Way (CRoW) Act 2000*

- 5.8. The section of the Act entitled 'Nature Conservation' strengthens and supplements the Wildlife and Countryside Act legislation for protected species and SSSIs (Sites of Special Scientific Interest). The site contains a SSSI.

#### *Natural Environment and Rural Communities Act 2006*

- 5.9. The Act places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. The potential impact of the application proposals upon biodiversity interests is discussed later in this report.

#### *Planning (Listed Buildings and Conservation Areas) Act 1990*

- 5.10. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states: *In considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority (LPA)... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*
- 5.11. Section 72(1) of the same Act states; *...with respect to any buildings or other land in a conservation area...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*
- 5.12. There are no on-site or adjacent Listed Buildings and the development is not situated in a Conservation Area or in close proximity to any nearby Conservation Area.

#### *Crime and Disorder Act 1998*

- 5.13. Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998 (impact of Council functions upon crime and disorder), in the assessment of this application. The proposals do not raise any significant issues in this regard and consideration has been given to policing in the area and designing out crime. The implications for crime and disorder would need to be considered as part of any subsequent submission of reserved matters for layout and design.

#### *Equality Act 2010*

- 5.14. Consideration has been given to the provisions of Section 149 of the Act (public sector equality duty) in the assessment of this application for outline planning permission. The proposals do not raise any significant issues in this regard.

## **LOCAL AND NATIONAL POLICY**

5.15. The following policy documents and policies are relevant to the consideration of this application.

5.16. **National Planning Policy Framework (NPPF)**

### **National Planning Practice Guidance (NPPG)**

5.17. **Suffolk Coastal District Local Plan Core Strategy and Development Management Policies July 2013**

Policy SP1 - Sustainable development

Policy SP2 - Housing numbers and distribution

Policy SP3 - New homes

Policy SP5 – Employment Land

Policy SP10 - A14 and A12

Policy SP11 - Accessibility

Policy SP12 – Climate Change

Policy SP14 – Biodiversity and geodiversity

Policy SP15 – Landscape and townscape

Policy SP16 - Sport and play

Policy SP17 - Green space

Policy SP18 - Infrastructure

Policy SP19 – Settlement Policy

Policy SP20 – Eastern Ipswich Plan Area

Policy DM2 – Affordable housing on residential sites

Policy DM12 - Expansion and intensification of employment sites

Policy DM19 – Parking Standards

Policy DM20 - Travel plans

Policy DM21 - Design Aesthetics

Policy DM22 – Design Function

Policy DM23 – Residential Amenity

Policy DM24 - Sustainable Construction

Policy DM25 - Art

Policy DM26 - Lighting

Policy DM27 – Biodiversity and geodiversity

Policy DM28 - Flood risk

Policy DM32 - Sport and play

Policy DM33 - Allotments

5.18. **Suffolk Coastal Site Allocations and Area Specific Policies January 2017**

Policy SSP1 - New housing delivery 2015-2027

Policy SSP32: Visitor Management – European Sites

5.19. **Suffolk Coastal Local Plan Saved Policies**

AP51 – General Employment Areas

AP212 – Ipswich Fringe: open character of land between settlements

AP216 – Ipswich Fringe: Martlesham Heath Industrial Estate

5.20. **Suffolk County Council Minerals Core Strategy September 2008**

Policy 5

5.21. **Suffolk County Council Mineral Specific Site Allocation Plan 2009**

Site allocations - Sites 1A and 1B

5.22. **Deben Estuary Plan 2015 – Deben Estuary Partnership**

5.23. **Emerging Martlesham Neighbourhood Plan**

The draft was subject to a consultation period in July and August 2017. It has been agreed that it may now proceed for examination by an independent examiner. The examination is expected to take place in early 2018. Following this, if the Plan is approved by the examiner, there will be a public referendum of Martlesham residents seeking approval for it to be formally made by the District Council.

The Neighbourhood Plan does not extend to the application site, however it will be relevant to off-site connections proposed and the future development of the wider community.

## 6. PLANNING CONSIDERATIONS

### Introduction

- 6.1. This outline application requires a broad range of considerations and is influenced by input from the previously listed consultation responses. Throughout the application process there has been extensive collaborative working between the Council's officers, consultees and the applicants' consultants. This has particularly been the case between the Council and Suffolk County Council through the signing of a Planning Performance Agreement (PPA) and an agreed single team approach to the application.
- 6.2. Officers have also closely engaged with Parish Councils and regular meetings and updates have occurred prior to, within and after consultation periods. Despite there remaining outstanding objections to the application the relationship of the three main Parish Councils with the Council and the applicants has been positive.
- 6.3. As an outline application with all matters reserved except access, the detail of some considerations would be left until later reserved matters applications. Those reserved matters applications are likely to cover smaller phases of the site but every one will be subject to public engagement and consultation.
- 6.4. This report considers the proposal under the following subject headings:
  - Principle of Development
  - Ecology and Biodiversity
  - Heritage and Archaeology
  - Community Infrastructure
  - Traffic and Movement
  - Design and Layout
  - Landscape
  - Housing
  - Utilities and Drainage
  - Environmental Considerations
  - Creating a Community
- 6.5. The subjects are considered in this report in this order to reflect the approach that has been taken to this proposal by officers and the applicants from pre-application stage. The masterplan and necessary mitigation for the development have been heavily based on consideration of the effect of development on a number of on-site and local sensitivities. These include the proximity of the site to the Deben Estuary, on site Scheduled Monuments and the scale of education provision necessary to address the pupils generated by the development.

## PRINCIPLE OF DEVELOPMENT

- 6.6. The starting point for decision making on all planning applications is that they must be made in accordance with the adopted development plan unless material considerations indicate otherwise (Section 38 (6) of the Planning and Compulsory Purchase Act (2004)).
- 6.7. Policy SP2 (Housing Numbers and Distribution) of the Core Strategy sets out how the Core Strategy makes provision for 7,900 homes in the District between 2010 and 2027. This policy identifies the need to progress to an Issues and Options Report by 2015 at the latest, which would include identifying the Full Objectively Assessed Housing Need. The publication of an Issues and Options Report did not take place until August 2017, for reasons including the delays caused by the High Court and Court of Appeal challenges to the Core Strategy. In a number of recent appeals, Planning Inspectors have taken the view that this delay has caused Policy SP2 of the Core Strategy to be out of date.
- 6.8. In this context, paragraph 14 of the NPPF applies:  
*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.*
- 6.9. However, it should be noted that the tilted balance applies only in a case where less than substantial harm is said to arise where it is considered that, in accordance with paragraph 134 of the NPPF, that such assessed harm to the significance of heritage assets is outweighed by the public benefits of the proposals. This is discussed further in the heritage section.
- 6.10. Policy SP20 (Eastern Ipswich Plan Area) of the Core Strategy is fundamental to the principle of development on this site and it establishes the direction of major strategic housing growth in the District and East Ipswich Plan Area (EIPA). That growth is in the form of a commitment to delivering up to 2000 homes on Land to the South and East of Adastral Park (the application site) which is also established by the housing distribution policy SP19. These policies are clear in respect of the location, amount of housing and the infrastructure necessary to deliver a sustainable plan-led development.
- 6.11. The site has been subject to formal consideration for this scale of housing growth since 2008 when it was selected as the preferred strategic housing growth site in the District over four others in the EIPA. It was recognised at that time that a major strategic housing development would be necessary in order to deliver housing growth in the most sustainable area of the District, alongside the major infrastructure improvements required for such growth.

Multiple smaller sites were not preferred due to piecemeal delivery of infrastructure or the need to pool section 106 funds for infrastructure, such as a new school. That commitment developed into the adopted Core Strategy (2013) and policy SP20 of that document. The established principle of development on this site has influenced the District's Housing Land Supply and housing allocations since that time. Whilst it has taken a number of years to reach the point of a planning recommendation, over that period the development plan has remained focused around this housing commitment. The Site Allocations and Area Specific Policies Document (SAASP) further recognised this commitment and updated the policy position in Policy SSP1.

- 6.12. It must be recognised that following the adoption of the Core Strategy and the subsequent SAASP, the principle of development of this scale in this location is well established within the development plan. Furthermore the commitment to this amount of housing growth and the adoption of SP20 has been subject to extensive scrutiny in the High Court and Court of Appeal in 2014 and 2015 following an unsuccessful legal challenge from No Adastral New Town (NANT). The policy is sound and the critical considerations to now be applied must be in relation to the ability for the proposal to mitigate its impact and for it to accord with the extensive requirements of SP20 and other Local and National policy.
- 6.13. Policy SP20 focuses on a very wide policy area around the East of Ipswich, dividing it into; the main urban corridor; the countryside, and; the area to be covered by the Martlesham, Newbourne & Waldringfield Area Action Plan. The application site falls within the latter and SP20 does state that *"Given the scale and potential impact of a development of this scale (both housing and employment) it will be the subject of an Area Action Plan which looks beyond just the site specific issues but takes on board the wider impact of change"*.
- 6.14. Since the adoption of the Core Strategy, the policy position has evolved. First, Martlesham Parish Council are progressing a Neighbourhood Plan. That Plan has an associated area which covers Old Martlesham, Martlesham Heath and the employment and retail areas east of the A12. The application site is not part of that area. The result of this Neighbourhood Plan Area is a substantially reduced area for what would be a Martlesham, Newbourne & Waldringfield Area Action Plan. Based on this and the landowner's then intention to progress the site through a planning application, the 2015 Local Development Scheme (LDS) confirmed that the Council no longer proposed to prepare the Martlesham, Newbourne and Waldringfield Area Action Plan.
- 6.15. As part of the examination into the SAASP in August 2016 the examining Inspector accepted the following wording for inclusion in the SAASP : *"Policy SP20 provides the policy criteria against which to assess the future development of this area and so this policy has not been replicated in the Site Allocations document ... Any permission for development will require the production of a masterplan which will be subject to separate consultation and community input"*.
- 6.16. The policy wording of SP20 does not require the production of an AAP. As with any development plan policy, the purpose of SP20 is to set criteria against

which a planning application will be assessed. It is however, important for the Council to keep in mind the reason why an AAP was originally proposed in the Core Strategy. It was proposed so that SCDC could exercise further control over the detail of any planning application, given its scale and likely impacts, in the interests of the proper planning of the area. In particular the proposal for an AAP was supposed to be one of the ways in which the Council would ensure that the development of the Adastral Park site did not breach the Habitats Directive (in the absence of a Planning Application at that time demonstrating the same process). The Council can lawfully proceed to determine the Adastral Park application without an AAP being adopted. There is no statutory or policy requirement for SCDC to adopt an AAP.

- 6.17. As mentioned, the Council relies upon the delivery of this site in order to meet its five year housing land supply. The expected completion of new homes at Adastral Park has been accounted for in the District's Housing Land Supply Assessments for the past four years and in earlier years the Council's forecasting has not been accurate for this site due to the delay in it coming forward. The Council remain in a challenging place in respect of its five year housing land supply. Delays in this site, amongst others, are often cited in appeals when appellants make a case against the Council demonstrating a five year supply. In order to enable the Council to guard against un-planned speculative development across the District it is essential that efficient determination and positive weight is given to existing plan-led housing allocations.
- 6.18. It is recognised that a large number of concerns remain about how this development will integrate into the area and with existing communities. It is important that the applicants and the District Council continue to work closely with existing communities to ensure that this site can sustainably integrate into this sensitive area and that will be explained throughout this report. The site is proposed in a comprehensive manner so all proposed and cumulative impacts can be dealt with in one go. No part of the proposal suggests that it would be part of a larger site in the future (apart from the proposed Northern Quadrant extension). Some concern has been raised that the masterplan prejudices future expansion opportunities. Those concerns are not shared by officers.
- 6.19. Due to the location, size and nature of the development, the project is a Schedule 2 development under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 as amended. It may be considered likely to have significant effects on the environment and consequently, requires an Environmental Impact Assessment (EIA). The applicants submitted an Environmental Statement (ES) with the application. Consultation took place with statutory and other consultees prior to the production of the ES through a scoping exercise which informed its content. The ES has appropriately considered the likely significant environmental impacts of the development project. This report has been produced taking the environmental information into account. Members must take into account the ES when considering this application.



- 6.20. The planning application is accompanied by a set of Parameter Plans which limit the scale, density, location and quantum of development and uses and these were used to assess against in the production of the ES. The Parameter Plans provide a very basic level of information and would form the basis of any planning permission. Subsequently they would be used to inform the more detailed reserved matters applications which would follow. In support of the Parameter Plans and to demonstrate how the development could come forward on the basis of the Parameter Plans, an Illustrative Masterplan has been submitted in support of the planning application. This together with the detailed Design and Access Statement provide a degree of comfort that the Parameter Plans can be used to bring forward a detailed scheme which accords with the overall objectives of the outline proposal.
- 6.21. In addition to the parameter plans, the Design and Access Statement provides a significant amount of detail in respect of the design principles for the implementation of the masterplan. The approach taken has been a collaborative one, with officers first influencing the key areas of the site where additional detail was necessary for the submission. The content of the Design and Access Statement is addressed later in the Design and Layout section and within the detailed consultation response from the Principal Design and Conservation Officer, provided as Appendix 1. It has been agreed with the applicant that specific sections of the Design and Access Statement could be conditioned to ensure that future reserved matters application accord with the proposed design principles.
- 6.22. This section should also recognise the applicants' attention to compliance with the infrastructure requirements set out within Policy SP20. The policy benefitted from being underpinned by the East Ipswich Fringe Infrastructure Study which was carried out in 2009. SP20 and Table 6.1 of the Core Strategy set out what Infrastructure Requirements would be necessary to mitigate the impacts of 2000 homes in this location. The up-to-date position remains very much similar.

## **ECOLOGY AND BIODIVERSITY**

### *Deben Estuary SPA and on-site mitigation*

- 6.23. Since this site was first considered in 2008 as a preferred location for housing growth, its sensitive position in respect of ecology and biodiversity was recognised. The proximity of the site to the Deben Estuary, which is a Special Protection Area (SPA) a European designation (also known as a Natura 2000 site), requires specific consideration in light of the 2017 regulations. The site also has the potential to affect the Sandlings SPA and the Stour and Orwell Estuary SPA's. This proximity has been the cause for a significant extent of past objection to the policy commitment for this housing growth and some of the public objection to the current application. It was also one of the bases for the unsuccessful High Court and Court of Appeal legal challenges to the Core Strategy. Policy SP20 correctly gives significant weight to the need for an 'Appropriate Assessment' as required by the Habitats Regulations and the Core Strategy is clear that if the quantum of housing committed to cannot be

adequately mitigated against, then a lesser number of homes may need to be provided.

- 6.24. When the applicants first approached the Council at pre-application stage, it was emphasised by officers and recognised by them that the mitigation required should be a leading factor in developing the proposal for the site. Therefore, ahead of engagement on the important pre-application matters such as highways or design, the first area of discussion was the extent of mitigation required on-site to address the recreational impacts on the Deben Estuary. A range of parameters were agreed with the statutory consultee in this respect, Natural England, and a detailed proposal was submitted setting out the Suitable Alternative Natural Greenspace (SANG) proposed for the site.
- 6.25. The Council considered at that stage that it would be essential to gain the independent advice of a consultant Ecologist to review the submitted proposal and to advise the council. A consultant was appointed and they have reviewed the application, engaged with consultees and advised the Council throughout the application process. This includes undertaking a Habitats Regulations Assessment. This report is directly influenced by that advice and that advice has also been subject to review by Legal Counsel.
- 6.26. The application is supported by a Shadow Habitats Regulations Assessment to aid the Council in discharging its requirement as the Competent Authority to undertake an Appropriate Assessment. The Planning Application also includes an Ecology chapter and relevant appendix within the Environmental Statement along with some detail relating to the SANG provision within the Design and Access Statement and Planning Statement.
- 6.27. The shadow HRA describes that there would be likely to be a significant effect upon the Deben Estuary SPA from increased walking with or without dogs, and bicycle riding, from residents of the proposed development in the absence of mitigation. The increase in recreational visits to other European sites was considered to have no likely significant effect due to distance to car parks and the alternatives available to residents. The assessment of likely significant effects within the shadow HRA, absent of mitigation, is considered to be correct.
- 6.28. Increases in population invariably mean that there is also likely to be an increase in the number of people visiting European site. Those sites are more often than not, vulnerable to recreational pressures which can cause adverse impacts and detriment to the integrity of the qualifying features of such designated sites. Impacts usually associated with visitor pressure include noise and visual disturbance to species that are integral features of a European sites' designation, trampling/compaction/erosion issues associated with pathways, nutrient enrichment associated with dog fouling and illegal fires, and pollution from litter, spillages etc.
- 6.29. The nearest point of access to Deben Estuary SPA accessible by foot is at Waldringfield which is accessible by a public footpath. The shadow HRA uses data on dog walking frequency to show that 20% of dogs are walked for over one hour, during which time it would be possible to reach the Deben Estuary from the site and return. The 2000 homes gives an average of around 67

dogs walked for that amount of time, and if there were an absence of other places to walk locally, or such places were considered less attractive as dog walking destinations, it is likely that the walks would be to the Deben Estuary at approximately 2km by footpath.

- 6.30. This number of new walkers, with or without dogs, could give rise to a major increase in disturbance to birds using Deben Estuary SPA site if all walks were directed to the estuary. Although the precise amount of harm that would occur in the absence of mitigation cannot be quantified, it is considered that a large number of new recreational walks with or without dogs would be harmful to the Deben Estuary SPA.
- 6.31. The quantity of walks with or without dogs that could be directed towards the Deben Estuary would, in practice, be moderated by the number of existing alternative walks available and the attractiveness of these walks to new residents. It is considered that walkers would choose from the range of alternatives and so the number of walks to the Deben Estuary would be fewer than the total number of walks taken.
- 6.32. In order to mitigate any such harm, a 'Suitable Alternative Natural Greenspace' (SANG) has been designed into the proposed development, to provide an alternative on-site recreational opportunity for walkers with or without dogs, thus reducing visitor pressure to European sites and addressing any likely adverse effect. This greenspace would be in addition to the formal recreational open space required of the development.
- 6.33. A number of consultees have queried the amount of SANG to be provided. Policy SP20 of the Core Strategy requires what is now called SANG, based on its Appropriate Assessment, but does not quantify the amount required. The amount of SANG was calculated by the applicant using parameters originally designed for SANG in Thames Basin Heaths (Surrey, Berkshire, Hampshire), with the amount being based on a ratio of 8ha SANG per 1000 residents, and the number of residents being based on the average number per dwelling. The applicant has used 1.57 people per dwelling to calculate the SANG requirement, but acknowledges that this is not the number of predicted residents per dwelling. The applicant's estimate of number of people per dwelling takes into account a reduction in the number of people per household elsewhere in Suffolk Coastal as a result of the development, for example if a household divides with part remaining in the original house and part moving to Adastral Park. It is important to recognise that the effectiveness of the SANG as mitigation is not entirely based on its size, but its quality as an attractive natural space for recreation is equally, if not more fundamental to its success.
- 6.34. Suffolk Coastal District Council's statutory advisor on all matters relating to European sites is Natural England. Prior to making the planning application, the applicant discussed SANG size and Natural England agreed to the calculations proposed by the applicant. It is clear that Natural England has considered the SANG size and parameters and as a statutory consultee they have no objection to the proposed amount and form of mitigation and the

application as a whole. In this respect, they have responded in their consultation response stating that:

*“The area of Green Infrastructure (GI) to be created as part of the development (based on predicted occupancy rates) is less than the guideline figure of 8 ha per 1000 people of Suitable Accessible Natural Green Space’ (SANG) quoted in the Environmental Action Plan. This figure is a guideline rather than an absolute measure. It is Natural England’s advice that from the information provided with the application, a significant area of high quality green infrastructure, incorporating a range of wildlife habitats and recreational opportunities will be provided*

*In terms of mitigating impacts on designated nature conservation sites, it is the combination of Green Infrastructure plus contributions towards site specific measures on designated sites site specific measures (The RAMS project) which Natural England advises is sufficient to avoid any adverse effect on designated sites.”*

- 6.35. The 25.12ha of high quality SANG will be created within the proposed development, comprising a core block of 18.1ha with 7ha of linking paths that will include existing public rights of way. These rights of way will be enhanced, where appropriate, by planting and landscaping in order to create a more attractive walking, cycling and horse riding experience. The figure of 25.12ha will also include 3.3ha of informal outdoor play space designed to complement the semi-natural environment.
- 6.36. The SANG for the Site has been designed to be both attractive and convenient according to the shadow HRA. The focal point of the proposed publicly accessible greenspace area will be the existing lake, surrounded by a landscaped area of open meadow and amenity grassland for informal/passive recreation. There will be some mown grass and semi-surfaced paths and it will form a safe, attractive and accessible suite of publicly accessible habitats, including meadow, heath, woodland, water and scrub. It is designed to provide a high quality recreation offer that will encourage residents from the new development to walk on the area rather than visit the Deben Estuary SPA.
- 6.37. The 3.3ha of informal outdoor play space within the newly-created greenspace will be of a design and nature that is suitable within the character of a SANG, such as timber trim trail equipment and landscaped areas for play. This will be complemented by formal recreation play areas and sports pitches elsewhere in the development and it will be spread around the SANG to encourage the use of recreational routes.
- 6.38. There will also be a low disturbance zone within the SANG, which would be managed for wildlife, focused on the semi-aquatic wetland edge of the lake and surrounding vegetation where new tree planting will take place. Habitats in this zone will be specifically developed for species such as sand martin and nightingale. This part of the SANG will not be readily accessible to the public.

- 6.39. The SANG provides natural habitats and water views, with a circular walk of 2.5km within the core block, plus an increase in the attractiveness of the circular walk around the proposed development which is around 6km long. Car parking is not provided for the SANG because it is intended for local use rather than attracting people from outside the development. It is not proposed to be a 'Country Park' for the wider area or any existing deficiency, as per similar mitigation being provided in the Ipswich Garden Suburb and 'Country Park' is not required for policy compliance.
- 6.40. Public rights of way leading from the SANG circular route will be upgraded, by adding a new crossing point for the A12 so that the public bridleway to the west, towards Kesgrave, can be used for walks away from the Deben Estuary. A cycle route to the north by upgrading a footpath to bridleway would also be provided. Site information boards will promote the SANG and walks away from the estuary along with a resident's welcome pack.
- 6.41. It is concluded that the SANG will form an effective part of the measures to safeguard the Deben Estuary SPA .
- 6.42. Concerns have been raised locally in relation to the impact of the development on Sites of Special Scientific Interest (SSSI's) in Martlesham and Newbourne as part of the HRA consultation. The Habitats Regulations relate to the need for an appropriate assessment only in respect of European Sites. SSSI's are not European Sites and consideration of the impact on such sites should be considered separately. The Environmental Statement assessed the recreational impact on local SSSI's as being neutral and negligible and concluded that there would be no significant impact. There could be a modest increase in visitors to these locations, but the SSSI's are on the outer limit of short routine outings from the Site (such as daily dog walks). Visitor and habitat management already takes place in both locations with management and monitoring plans in place. The ES concludes that the local SSSI's are capable of absorbing new visitors. In particular, Newbourne Springs SSSI is run by Suffolk Wildlife Trust who welcome the public on to the nature reserve and who have not objected to its increased promotion or use.

#### *Recreational Avoidance Mitigation Strategy (RAMS) contribution*

- 6.43. In addition to on-site mitigation, policy SP20 and the appropriate assessment for the Core Strategy recognised the need for off-site mitigation to address recreational impacts on the Deben Estuary and other SPAs. This would not just be as a result of the 2000 homes planned for this location but also a significant proportion of planned homes across the District. For that reason the Council, in conjunction with Ipswich Borough Council and Babergh District Council is in the process of producing a Recreational Avoidance Mitigation Strategy (RAMS) document which will set out the level of mitigation required for housing growth across the three Districts/Borough. The mitigation will be in the form of wardening, monitoring and improvements in recreational areas of the Stour, Orwell, Deben, Alde and Ore Estuaries and the Sandlings as SPA's. At present this document remains

in development but there is an intention for a consultation to commence on its content, aims and levels of charging later this year.

- 6.44. Recently, in the absence of an adopted document, Suffolk Coastal has been seeking section 106 contributions to contribute to this strategy at a rate of £150 per dwelling. This has been applied to major developments within a sensitive distance of SPA's. This level of financial mitigation for off-site measures has been agreed with Natural England. It is collected by the District Council and will be fed into the RAMS project once it is up and running.
- 6.45. The applicant has agreed to make this financial contribution through the section 106 agreement in addition to their on-site mitigation. The total amount would be £300,000 and this would be a large early contribution to the strategy to enable it to develop swiftly after RAMS is adopted. It is proposed that this contribution should be directed first of all to the Deben Estuary, rather than any other area in the strategy due to the close relationship of the site. RAMS will be implemented within the earliest phases of occupation on the site.

#### *Habitats Regulations Assessment (HRA)*

- 6.46. Much of this section is based upon the Habitats Regulations Assessment carried out by the Council's consultant ecologist. This sets out that on-site mitigation measures and the RAMS contribution would remove any risk of a significant effect on the identified European sites. On 9<sup>th</sup> November a three week consultation on that HRA took place, seeking the views of Natural England, other organisations and Parish Councils. The Council's HRA was published on its website along with the applicant's shadow HRA and the previous Natural England response to the application. A further consultation response was received concluding Natural England had no further comments beyond those made within the application (raising no objection). That consultation and package of documents has discharged the Council's duty as Competent Authority in undertaking a Habitats Regulations Assessment of the development. These would be secured through the section 106 agreement and conditions. Subject to this mitigation being delivered, it has been concluded that there would be no likely significant adverse effects.

#### *Protected species on the site*

- 6.47. The site does not only affect nearby sensitive habitats and species but also species that are present on the site, including a number of protected species. Due to the size of the site and the mix of environments it contains this is not to be unexpected. The applicants have undertaken thorough ecological surveys of the site to ascertain the species and habitats present and the mitigation required. The site is also a quarry so large areas of the site have a low ecological value and are or have been subject to significant disturbance. The site does however include a lake, areas of grassland, woodland, empty buildings and planted bunds.

- 6.48. Protected species on site include:
- Bats – wide variety of species using the site for foraging and commuting, including rare species. One tree and one building confirmed as roosting sites, and a further two buildings used for feeding perches;
  - Birds – a wide variety of birds of conservation concern using the site for foraging, dispersing, breeding and overwintering;
  - Badgers – multiple signs of badger foraging and dispersing around the site, including the working quarry areas, arable field boundaries, the bunds around the quarries, and particularly, along the southern corridor and field to the north of the quarry complex. A limited number of outlier/subsidiary badger setts are present on site;
  - Reptiles - low numbers of common lizard and grass snake utilising discrete patches of grassland in the west and south of the site;
  - Invertebrates – diverse invertebrate assemblage utilising the open and bare ground habitats around the site, particularly on the bunds of the quarry; and
  - Small and medium-sized mammals – presence of European hedgehog within scrub and grassland habitats.
  - Otters – There is no ecologist evidence of Otters on the site, however there are local reports of Otters feeding from in the lake. The lake is currently stocked with non-native carp for coarse fishing. It is the applicant's intention to relocate the carp, which have a negative ecological effect on the lake, in agreement with the current fishing syndicate. This artificial fish population is not a necessary food resource for Otters moving through the area and no mitigation is required.
- 6.49. Mitigation is proposed throughout the site habitat creation, relocation and protection methods. Provision for the safeguard and enhancement of habitats and species is largely based around provision of high-value habitats within the SANG. The proposals put forward by the applicants are generally suitable to maintain the habitats and species, with enhanced heathland habitat to be created. There would be a net loss of habitats, but providing a higher quality set of habitats will offset this to a large extent. It is considered that the retention and creation of habitats as proposed by the applicants is acceptable.
- 6.50. It is considered that habitat can be recreated for all seven rare and notable species of plant within the SANG, with relocation of species into the SANG through translocation of individual plants, seed collection and transfer, or transfer of soil containing a seedbank. Creation of acid grassland, other grasslands and open mosaic habitat on sandy soils using existing sources of species on-site is a greater priority than standard 'wildflower grassland' seed mixes.
- 6.51. In respect of invertebrates, provision of suitable habitat within the SANG is proposed by the applicants, and this is considered suitable to attract these species and maintain the assemblage. Further, the creation of heather heathland is considered to increase the quantity and quality of habitat for

heathland species present on nearby heaths, such as silver-studded blue butterfly, which might be able to colonise.

- 6.52. The Environmental Statement found that no ponds on or near the site were suitable for breeding great crested newts. A small number of common toads are likely to use peripheral and retained habitat. It is considered that no mitigation is required specifically to address impacts on amphibians.
- 6.53. A sample survey presented in the application found a small population of common lizards. Grass snake was also observed during other surveys. The survey information was sufficient to indicate that there are reptiles in suitable habitat on the site. The ES proposes that the SANG will provide suitable habitat for a viable reptile population, with reptiles on construction areas to be trapped and relocated to the SANG prior to construction, and barrier fencing to prevent reptiles moving into construction works.
- 6.54. In respect of birds, the proposed development footprint is currently within and adjacent to the breeding territories of several red-list/BAP and amber-listed species (e.g. nightingale, shelduck and linnet). The loss of the scrub habitats without mitigation is considered to be minor negative at the District level, and significant for those species through disturbance and habitat loss. Other losses especially on extensive grasslands with skylark are also assessed as minor negative at the Local level. Other losses are assessed as Negligible.
- 6.55. The Proposed Development is currently within and adjacent to habitat for a number of wintering birds including the red and amber-listed and BAP species (skylark, linnet, meadow pipit, dunnock, fieldfare and song thrush), particularly across the grassland and arable farmland habitats and associated scrub and ruderal vegetation. The loss of habitat and associated disturbance for these species (grassland and arable) without mitigation is considered to potentially result in a minor negative impact on these wintering species in the Local context. Mitigation is proposed in the Environmental Statement including habitat creation in the SANG to include scrub with little public access, and nesting opportunities for water's edge bird species. Nest boxes for within the site and on buildings for swifts, house martins, starlings, house sparrows will be delivered by condition.
- 6.56. It is noted that RSPB considers that it may not be possible to provide habitat of sufficient quality or quantity to be confident that some bird species could be maintained on site. The Council's consultant ecologist advises that there could be maintenance of nightingale populations but there would be a loss of skylark nesting territories. The vast majority of skylarks in Suffolk Coastal and in the UK nest on farmland, and the overwhelming factor affecting nest site quality is agricultural policy. Skylark is an abundant species, despite historical declines due to agriculture. The loss of skylarks to development is trivial in comparison to change resulting from agricultural practice and policy, and thus is considered to be a minor negative impact which cannot be mitigated.
- 6.57. The Environmental Statement contained redacted information about badger locations on the proposed development site. A non-redacted version was used to inform this report. There are a small number of setts in use by



badgers, being outlier setts or subsidiary setts in occasional use with no main sett found. As no main sett has been found or would be affected, no artificial sett creation is proposed but habitat in the SANG and elsewhere would provide suitable sett-digging opportunities. These areas would also be suitable for badger foraging. Licences would be needed from Natural England permitting the closure of the setts or working so close to setts that badgers within them would be disturbed. Measures would also be needed to prevent badgers from falling into excavations such as trenches and being trapped.

- 6.58. Activity by at least nine species of bats was recorded, using in particular the lake and surrounding field, Spratt's plantation, and site boundaries. Barbastelle, a rare species, was recorded occasionally during activity surveys. Seven trees have moderate or high potential to be used as a bat roost, with 6 having no evidence of a bat roost and one found to have a pipistrelle roost and a possible barbastelle roost. The tree with a confirmed roost is just to the south of the development site; on the roadside across the road and there is potential for illumination during the construction phase. Bat roosts were found in Building 6 in the BT Business Park, which is unlikely to be demolished, and in Building E which would be demolished. The roost in building E (three storey tower on long-range test site) was a pipistrelle day roost in summer and probable hibernation use. Two World War 2 pillboxes had negligible bat potential. There were also two feeding perches in quarry buildings. Operational phase impacts include loss of foraging due to loss of open habitats and to lighting which deters bat flight.
- 6.59. Protection of the bat roost in a tree, from lighting impacts during construction is to be secured by condition. Compensation summer roosts to replace the two building roosts to be lost are not specified in the application although the need to provide them is recognised. Options include incorporating roosts into buildings or placing bat boxes on trees.
- 6.60. Replacement hibernation roost opportunity would be made within the two pillboxes on site, within the Heritage Park. This would need detailed design, such as adding roost features inside the pillboxes, blocking windows to prevent light and draughts entering, and providing an entrance suitable for bats but not people or cats to enter. The Heritage Statement submitted with the ES recognises the conversion of pill boxes to bat roosts and Historic England's comments suggest acceptance.
- 6.61. The Environmental Statement describes that no otter or water vole would be impacted as these are generally absent; very occasional visits by an otter are made but are unlikely to form a significant part of its foraging or other requirements. No mitigation is needed.

#### *Environmental Action Plan (EAP)*

- 6.62. In order to effectively implement all mitigation and draw together necessary conditions required to provide protection and mitigation for species and habitats an Environmental Action Plan (EAP) has been developed. This will be

considered in two parts and it is an approach which has been recommended and endorsed by Natural England. Part 1 has been submitted and provides a Framework which will assist in framing any conditions attached to the planning permission and which have been recommended by various ecological and landscape consultees and advisors. The Framework also provides further elucidation and clarification in respects of proposed on-site mitigation measures and the RAMS contribution. Part 2 of the Environmental Action Plan will provide detail to discharge pre-commencement planning conditions.

#### *Geology – Site of Special Scientific Interest (SSSI)*

- 6.63. Although this is not an ecological matter, it is considered by the same consultees and in the same supporting documents as ecological matters. Waldringfield Pit SSSI, designated for geological reasons, is within the development. It consists of a vertical quarry face in which various layers of soft rock may be studied. A condition is proposed to provide for the long-term roll-back of the quarry face to maintain visibility of the exposures, and for its management to benefit the public and to safeguard the special interest. This is beneficial to both the development and the SSSI, which at present is not publicly accessible. With its close relationship with the recreational open space and the school it has potential to become an asset to the community and may include some public interpretation.

#### **HERITAGE AND ARCHAEOLOGY**

- 6.64. The site contains a number of designated and non-designated heritage assets and it has some archaeological interest. Surrounding the site there are few heritage constraints. The nearest Listed Building is St John the Baptist Church (Grade II\*) which is 800m to the south of the site. There are no nearby Conservation Areas. Due to the lack of inter-visibility and distance, the proposal would not result in any harm to the setting of Listed Buildings or Conservation Areas. The on-site heritage assets were recognised at an early stage in the development of the masterplan as a significant influence on the layout and design principles of the proposal.
- 6.65. The site has already been subject to significant ground disturbance from the sand and gravel quarry and much of that was subject to previous archaeological investigation. It is agreed that undisturbed parts of the site will be subject to pre-commencement archaeological investigation under a condition.

#### *Scheduled Monuments*

- 6.66. Of greatest significance in terms of heritage on the site are the Scheduled Monuments in the form of three bowl barrows. Two are located in the north of the site within an area of woodland known as Spratts Plantation and one is

located in the western part of the site with a World War II pill box on top. Barrows are relatively common in this area and are an important part of an extensive prehistoric landscape that existed in the area. Historic England confirm that these upstanding prehistoric monuments are a remarkable survival from this period.

- 6.67. The two within Spratts Plantation are not currently visible and quite modest in size. They are presently covered with leaf litter and woodland undergrowth and they have not been subject to any management over recent years. They are within close proximity of a footpath which leads along the eastern edge of Spratts Plantation. The barrow in the west of the site is not publicly accessible but is visible from the southern end of Barrack Square, primarily because of the pill box on top of it. It is currently unmanaged, covered in bracken and it hosts an extensive rabbit warren. It is currently surrounded by agricultural land in the form of set-aside stubble.
- 6.68. As scheduled monuments, these barrows are not subject to the requirements of Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which is regularly considered in planning applications before the Planning Committee. This requires that special regard must be given to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. However, they are heritage assets and therefore paragraphs paragraphs 132, 134, 137 and 139 require careful consideration.
- 6.69. Historic England is the statutory consultee in respect of Scheduled Monuments. The applicants engaged with Historic England and Suffolk County Council Archaeology within the pre-application process and initial concerns were taken on board and influenced the masterplan layout. Primarily this involved the area around the barrow in the west of the site. The initial proposal was to provide a modest circular space around that barrow as part of a green SANG route leading east-west through the site. The applicants recognised Historic England's concerns about the effect of this enclosure on the setting of the barrow and it was agreed between all parties that an enlarged space should be provided in this area. This led to the submitted proposal to create a Heritage Park in this location, surrounding not only the barrow but also two other non-designated heritage asset structures in the vicinity of the barrow. This triangular park encapsulates the non-designated heritage assets and the Scheduled Monument, creating clear visual linkages between them and an opportunity for integrated historic interpretation. It also provides a direct visual linkage with the BT Pegasus Tower to retain some association with existing land uses.
- 6.70. Despite the addition of this enlarged open space, the barrow does remain enclosed by the proposal to its north and south by residential blocks positioned with front elevations a minimum of 20 metres from the edge of the barrow (based on the Heritage Park drawing). The setting of the barrow was once heathland, however that has not been the case for at least 80 years. The current setting would alter from a semi-rural landscape against the back drop of the A12 bund, BT buildings and quarry to an urban park setting. An undeveloped green route would remain in views to the west to the A12 bund

and through to the central SANG space to the west. The barrow would benefit from a substantial amount of openness to the north east in the form of the 1.4 hectare park and newly introduced public access and interpretation. The eventual design of this space and the buildings surrounding should be a comprehensive exercise at reserved matters stage and it will involve further input from Historic England.

- 6.71. In respect of the setting of a heritage asset, the NPPF states at paragraph 132 that:

*“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification”*

- 6.72. Harm to heritage assets can be split between ‘substantial harm’ and ‘less than substantial harm’. Historic England has objected to the application based on the harm to the setting of the barrow and they recognise the harm to be ‘less than substantial’. Great weight should be given to the views of Historic England as the statutory consultee and they state that this less than substantial harm represents harm of a high magnitude. Historic England’s objection is very much based on what they assess as a ‘huge’ change in the setting of the barrow. However, and in reality, it is considered anything less than leaving the whole of the area to the north east of the barrow undeveloped would still result in a huge change in setting. There is no doubt that this area will become urbanised irrespective of the amount of space preserved around the barrow. Due to other competing interests in the development of the masterplan, such as the provision of the SANG, the location of the A12 access and the need for a robust built frontage to the A12, officers acknowledge that provision of a greater amount of space around the barrow may not be practical in the efficient development of the site for up to 2000 homes.

- 6.73. In addition to the barrow in the west of the site, there are the two in Spratts Plantation. The consultation response from Historic England does address these also, though it is primarily focussed on the one in the west. Their concern is based on development taking place within 10 metres of the barrows. This is inaccurate in respect of built development. An area of the SANG would be provided to the east of the barrows and Spratts Plantation and that would be at least 19 metres wide. The Design and Access Statement also sets out that housing fronting onto the SANG will predominantly be set behind shared surface roads and front gardens covering approximately 5 metres. Historic England has asked for an enlarged buffer and a programme of enhanced management, including site clearance and management. It is officer’s opinion that the buffer in this location is sufficient, at approximately 24 metres, and this can be addressed in more detail through the reserved matters applications for that area.

6.74. Management, site clearance, enhancement and interpretation of the barrows is already proposed and conditions to deliver these requirements are agreed with the applicants. These proposals, particularly with the barrow in the west of the site, can be seen as a benefit of the development directly relating to the heritage asset. That heritage asset will be brought into the public domain (at present it is in a private field) and there is a wealth of interpretation information that can be provided in association with it, covering both its prehistoric and WWII interest. Comprehensively the heritage park is a beneficial addition to the development and there are some benefits in this directly related to the heritage assets. The Principal Design and Conservation Officer (Appendix 1) states:

*“I judge the idea of bringing all of these heritage assets into a direct spatial relationship with each other within an urban layout a strong one; and support the idea of a visual link between the Scheduled barrow and Pegasus tower. There will be substantial public benefits that are heritage benefits that will arise in terms of the conservation, protection, management and interpretation of these features.”*

6.75. Based on the recognised harm resulting from the proposals, it is necessary for due consideration and great weight to be given to the advice of Historic England when assessing the proposal against paragraph 134 of the NPPF, which states:

*“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”*

6.76. The Council’s Principal Design and Conservation Officer has provided a detailed assessment of the application and that also takes into account the advice of Historic England. This offers professional conservation advice to the case officer in respect of the approach that should be taken to the consideration of this harm. This includes a conclusion stating:

*“Historic England has identified that this harm will be of a high magnitude. This is, therefore, less than substantial harm which will need to be given great weight and will need to be weighed by the decision maker against the public benefits of the proposal, as per the test in paragraph 134 of the NPPF. I have already commented on what I consider to be the good quality of the proposal in terms of design and also what I regard to be substantial public benefits that are heritage benefits, above, but there will need to be other public benefits of the proposal which fall outside the scope of these comments and which will need to be taken into account by the decision maker”*

6.77. In respect of the specific concern raised by Historic England relating to the scale and density of buildings edging the Heritage Park, the Principal Design and Conservation Officer has also advised on this heritage consideration against urban design principles, stating:

*“From an urban design point of view, it is not necessarily desirable to reduce the scale of buildings that enclose a large open space. Buildings that are too*

*small or are positioned in a dispersed form can create a weak edge that fails to contain space and establish its character. It is not uncommon to find the largest villas, for example, surrounding a Victorian park in an historic town – both because of views gained but also because of the prestige and value associated with such an attractive position. I, myself, therefore would have reservations about reducing the scale and density of buildings that edge the heritage park”*

- 6.78. Recognising this policy requirement and the great weight that should be given to the views of Historic England, the following balance has been considered. The proposal must be considered as a whole and there are significant public benefits in the delivery of 2000 plan-led homes, including 500 affordable homes, the funding and provision of land for a much needed all through school, community infrastructure and open space and substantial economic benefits of major development. These significant public benefits weigh heavily in favour of the application. When weighed against the great weight given to less than substantial harm to a heritage asset, it is considered that the balance clearly falls in favour of the proposal.

#### *Non-designated Heritage Assets*

- 6.79. The heritage park proposed will also accommodate a range of WWII structures originating from the air base use of the site and the area now developed to the north and north-west. These include the pill box on top of the barrow, a further pill box and a brick tower base. There are no statutory duties concerning non-designated heritage assets. Whilst Historic England have commented on the non-designated heritage assets (in association with the scheduled monument) it is the Local Planning Authority’s responsibility to determine their significance and any harm that may result. Paragraph 135 requires that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In his advice, the Principal Design and Conservation Officer states:

*“In respect of the Non-Designated Heritage Assets that are the Type 23 pillbox and radio tower base I judge that there will be no harm arising from these proposals. The effect of the application on the significance of these heritage assets will, in my view, be entirely positive. For these reasons, therefore, I judge that there would be no harm arising from the proposed development’s effect on the significance of the non-designated heritage assets that are the Type 23 pillbox and octagonal brick base to the former radio tower. It is not necessary, thereby, to apply the test in paragraph 135 of the NPPF. In weighing the current application that directly affects the non-designated heritage asset that is a potential light anti-aircraft machine gun post, the decision maker will need to arrive at a balanced judgment having regard to the scale of any harm or loss and the significance of the asset. The gun post is not of very great significance – it is not a designated heritage asset and it has met 3 of the 10 criteria for identification as a non-designated heritage asset. Taking into account the significance of gun post, it is my judgment that its*

*complete loss would result in moderate harm. Loss of the gun post would not be mitigated by its recording prior to removal.”*

- 6.80. The proposals would result no harm to retained assets and moderate harm to one minor loss of an asset. It is therefore considered that there are benefits directly applicable to the non-designated heritage assets which in themselves outweigh the moderate and mitigated harm from the loss of one of those assets. In the wider balance there is clear favour in relation to this non-designated heritage asset compared to the benefits of the development as a whole.

## **COMMUNITY INFRASTRUCTURE**

### *Education*

- 6.81. Another area of the development which was established in the very early stages of pre-application discussions, including education colleagues at Suffolk County Council, was the form of education provision to be provided on the site.

- 6.82. 2000 homes will generate a significant number of school pupils and the County Council have indicated that this would break down to the following minimum pupil yield:

Primary school age range, 5-11:	500 pupils.
Secondary school age range, 11-16:	360 pupils.
Secondary school age range, 16+:	80 pupils.

- 6.83. The applicants acknowledged early on that the site would need to deliver a school and that local secondary schools are at capacity. Based on the pupil yield the site would generate enough pupils to provide a large primary school on the site but it would not generate enough secondary age pupils to require a standalone secondary school alongside a separate primary school. The land take of providing two schools would also significantly compromise the ability to deliver up to 2000 homes and associated green infrastructure. A section 106 contribution towards building a secondary school elsewhere or expanding an existing school was seen as ineffective in delivering a sustainable education solution capable of early delivery.

- 6.84. The solution put forward to enable the on-site delivery of both primary and secondary education was in the form of an ‘all-through school’. This form of school would provide pre-school, primary, secondary and potentially sixth-form education within a single school building/site. Whilst this is rather unconventional in terms of publicly funded schools, it is now emerging across the country as an effective education model and all-through schools have existed in the private sector of education for many years. It is an approach that the County Council are willing to embrace and due to the current Academy and Free-School programmes, this is a feasible approach to education delivery.

- 6.85. Originally the applicants had intended to build the school but it has now been agreed that the County Council will instead take the role of building the

school, drawing on their existing experience and resources in school building. The eventual school design will be a collaborative effort between the District Council, County Council and applicants and it is essential that it is designed to be a benchmark high quality design that sets the standard for architectural quality within the Primary Local Centre.

- 6.86. The proposal would therefore provide a 5.5 hectare school campus comprising of with an eventual capacity to provide for 52 early years places, up to 630 primary school places (three forms of entry), 900 secondary school places (four forms entry) and a possible 300 place sixth form. Through the section 106 the land owner will agree to transfer the school site to the County Council for £1 and will contribute a proportionate amount towards the development of the school. This would amount to over £18 million to cover the amount of pupils generated by the development from pre-school age through to 18. Overall the maximum sized school that the County Council would seek to provide would have a cost in excess of £35 million.
- 6.87. The additional secondary school capacity will provide for the wider area. This is a significant benefit to the area where schools are at capacity and recent and further planned housing growth may add to the need for this new school. Some previous developments have made s106 contributions which may contribute to this school.
- 6.88. The school would commence construction in an early phase with an intention that some of the primary school site should be capable of use by the time the 150<sup>th</sup> dwelling is occupied. In the initial period temporary classrooms may need to be provided at nearby primary schools and children may need to be bussed to those schools. Contributions to fund this initial approach are proposed for the section 106 agreement.
- 6.89. The school would be designed in a way that could be extended easily as the development and need grows. The secondary school is unlikely to be viable for delivery until a later stage into the development of the site. Funding will be phased from prior to the occupation of the 250<sup>th</sup> dwelling so SCC will be capable of commencing work at an early stage. Delivery of the full sized school too early introduces the risk that it would be under used to start with, creating operational problems. Alternatively it could become subscribed by pupils from outside of the site, leading to later phases of the development needing to send pupils to off-site schools. This should be avoided as an on-site school is essential to the sustainability of the development and influential upon the Transport Assessment that has been considered. The County Council agree that a careful approach to population dynamics of the site and the phasing of the school will need to be established.
- 6.90. Pre-school places would incorporated and funded within the all through school and in an off-site facility, potentially the community centre.

#### *Formal Recreational Open Space*

- 6.91. In addition to the SANG open space proposed for the site, which would be a natural landscaped space, the site would also provide an area of formal



recreational open space to meet the standard open space and outdoor sports requirements of the development. This is proposed to be in the form of a 7.9 hectare open space immediately to the east of the school site. This space would be a typical playing field with a level grassed surface for sports pitches and general recreation. This amount of space accords with the outdoor play space requirements of SPG 15 (Outdoor Playing Space).

- 6.92. At present this has been indicatively shown to include a cricket pitch, two standard football pitches and three smaller pitches/courts. This is not the proposed pitch layout and the form of pitches to be provided would be for later agreement and may be subject to change once the community has established. However, it gives a clear impression of the scale and flexibility of the space.
- 6.93. The space would also provide an opportunity for integrated landscaping and tree planting, particularly along its residential western edge. The SSSI is also located on its eastern edge and the space provides a suitable area to enable long term maintenance of this area of geological interest.
- 6.94. In the northern area of the open space the masterplan and Design and Access Statement show the provision of a sports pavilion. This facility would include changing and storage facilities and some form of social space to enable sports clubs and the community to use the open space for organised events and competitions. It is proposed that this would be up to 200 sqm in floor area. A parking area has also been indicated for the north east corner enabling parking for sports club users who may not live on the site.
- 6.95. Another important benefit of the open space being adjacent to the school is the ability for it to provide an expansion opportunity for further school playing field. The section 106 will commit to the shared use of the school by community, such as in the evenings for clubs and indoor sports, along with the use of the community open space on weekdays for school sports classes. Should the school need to expand in the longer term future beyond its current planned size, this flexible use of space would not significantly constrain school expansion.

#### *Allotments and Community Orchard*

- 6.96. The site also includes allotments and a community orchard for the needs of the proposed community based on the calculated need set out in the Ipswich Eastern Fringe Infrastructure Study 2009. These are presently shown to be accommodated in two locations, on the southern boundary and the eastern boundary. The two locations would sensibly spread these facilities across the site and they would be in locations which are well related to the SANG edges and walking and cycling routes. There would be a requirement to deliver a minimum of 0.83 hectares of allotment space in the section 106 agreement and that should include provision of level and enclosed sites with suitable soil, water supplies and storage facilities.

### *Primary Healthcare*

- 6.97. The proposed development of up to 2000 homes will result in a substantial local population increase, which will increase the patient numbers using local GP practices. The local GP practices are based at Martlesham Heath, Kesgrave and Woodbridge and they do not have capacity for the additional growth resulting from this development and cumulative development growth in the area.
- 6.98. The application provides an opportunity to mitigate the impact of development and to expand the primary healthcare provision in the area through the section 106. Mitigation can only be in the form of built infrastructure or funding for built infrastructure and s106 funds cannot be secured for the running of a facility or the funding of GP's or staff. The submitted application includes a proposal for a healthcare facility on the site within the Primary Local Centre. This could be in the form of a new GP practice or a satellite facility associated with an existing surgery. The applicants are prepared to build and provide this facility as part of the on-site infrastructure in order to address the impacts that the proposed population may have on existing GP capacity.
- 6.99. This proposal has been put to NHS England and the Clinical Commission Group (CCG) and it is not their desired approach to mitigation. Whilst 2000 homes would generate a substantial population increase in the area, it is not large enough to justify the provision of a new facility. There are limitations in the commissioning of new health care facilities, including the availability of funding to cover running of the facility or the availability of additional GP's. A new facility such as that included in the proposal could only prove feasible in a development of approximately 5000 homes or where an existing practice intends to relocate to the new facility.
- 6.100. Concerns have been raised locally that the proposed on-site facility could lead to the Martlesham GP practice relocating onto the development site and away from its existing community. It should be acknowledged that GP practices are predominantly privately owned and run and the NHS and CCG cannot dictate entirely how they operate. The Council understands that there is no current desire at the Martlesham practice to relocate onto the site and officers would share similar concerns to local residents and the Parish Council about removing a key service from the heart of an existing community.
- 6.101. Due to NHS England's lack of desire to commission a new facility on the site they have instead asked for section 106 funds to deliver extensions/expansions to existing practices in the area. The floor area sought has been calculated based on the population generated and the existing shortfall in floor space to accommodate the necessary additional GP's. This is a typical approach to mitigating the impact of development on primary healthcare. At present their consultation response suggests that they would seek to expand both the Martlesham Heath and Kesgrave practices. GP practices do not have catchment areas and therefore it is not the case that the entire population of the development would seek to utilise

the nearest practice. Some people prefer to use practices closer to their work or those already living in the area may want to retain their existing GP at another practice.

- 6.102. In more recent discussions it has been agreed with NHS England that the section 106 contribution of £725,466 should be flexible in where it could be spent. It may prove most efficient to focus all of the funding at the Martlesham practice, but it may also be more efficient to spread it between two or three practices. A conclusion on how it should be spent should be agreed with the Council and the local community at an appropriate early phase in the development and this can be a requirement of the section 106 agreement. It has also been agreed that the section 106 should retain the opportunity for an on-site facility to be built should there be a change in circumstance or NHS or government policy in the future. Unfortunately NHS England can only plan for healthcare provision over a five year future period, therefore they cannot account for any future plan-led growth in the District (until 2036) in appraising the wider need for a new facility in the area.
- 6.103. Some representations have raised concerns about the impact the development will have on local hospitals. The funding of hospitals (secondary and tertiary care) is not something that can typically be covered by section 106 agreements as it is funded separately through the NHS. NHS England has not sought to mitigate the impact of this development on secondary or tertiary care.

#### *Community Buildings and Primary Local Centre*

- 6.104. The masterplan has been designed with the development's community facilities at the heart of the site. All primary routes lead in to what is termed the 'Primary Local Centre' and it is focussed around the lake and school. Detail on the design approach to this will follow on later into the report. Included in this area will be a high street of shops and facilities along with a central parking square.
- 6.105. As part of this community focussed area a community centre would be provided at the eastern end of the high street. The current outline submission does not go into detail on the nature of the proposed community centre and that will be agreed under a reserved matters application. As set out in the later section on 'Creating a Community' there will be an opportunity for the community to be involved in plans for this proposal. It is proposed that the facility will be a minimum of 500 sqm in floor area which is proportionate for the amount of homes. The applicants/developer will construct the community centre and hand it over to the community once completed. In order to secure this it will be included as an obligation within the section 106 agreement. The specification for inclusion in the section 106 needs to be agreed but it is anticipated that the building will consist of a main hall, office and meeting rooms, a library drop off/collection facility.

### *Policing and Fire Service*

- 6.106. Suffolk Constabulary has made a request for section 106 funds towards the costs of policing the development. It is recognised that policing is partly funded directly through Council Tax though it is understood there is an unfortunate time lag period before Council Tax receipts reach the Constabulary. The initial section 106 request covered the construction of additional accommodation at their headquarters, Police Community Support Officer (PCSO) recruitment and funding, Police Car funding and Automatic Number Plate Recognition camera installation in the area. This initial request amounted to £752,664, later reduced to £515,294.
- 6.107. The funding of policing was not stipulated as an infrastructure requirement of policy SP20 despite Suffolk Constabulary making representations to the examination of that plan. The Council's Community Infrastructure Levy (CIL) 123 list sets out infrastructure which may be funded through CIL, and the funding of police infrastructure is stated as something which may be funded through CIL payments. However, that list is explicit in what may be funded at Adastral Park through the section 106 agreement instead of through CIL. The funding of Police infrastructure is not included in that list. Again Suffolk Constabulary made representations for inclusion on this list in the CIL examination but it was determined that wider police infrastructure should not be funded by section 106.
- 6.108. As will be explained in the following Housing section, there are substantial committed infrastructure costs resulting from this development and associated impacts on viability. A well evidenced approach must be taken to further infrastructure requests not included within the policy requirements and any included obligation must meet the tests of being necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.
- 6.109. One solution offered by the applicants to address Suffolk Constabulary's accommodation requirements is the provision of floorspace within the community centre for use by the Police for a Police Community Support Officer (PCSO). Overall the building is expected to cover 500 sq metres in area and it would be a facility comparable to the community centres located in Martlesham and Kesgrave. It would be feasible for a separate PCSO office to be provided within that amount of space. However, this is not a viable accommodation option for Suffolk Constabulary who would instead seek to provide office accommodation at their existing headquarters in Martlesham.
- 6.110. Discussions have taken place between the Council, Suffolk Constabulary and the applicants to consider what funding towards local policing could be funded through the section 106 agreement. Suffolk Constabulary acknowledge that funding of police infrastructure in the form of off site accommodation, police cars and automatic number plate recognition camera installation would not be CIL compliant as infrastructure.
- 6.111. Previously in the 2009 BT application was due to provide £250,000 community cohesion fund which could have partly been used for PCSO funding. No direct funding of PCSO's was agreed in the heads of terms at

that time and it has not formed any part of policy since. The most recent request from Suffolk Constabulary amounts to £450,368 to cover funding of one PCSO through the 14 years of the development. The applicant is considering this amount and whilst in principle some funding is likely to be agreed for the section 106 the final amount/duration of funding has not yet been agreed.

- 6.112. The Fire Service have responded to the application with standard advice and have requested that sprinklers are considered within the development and that a condition is imposed requiring the provision of fire hydrants. The condition will be included and the applicants (and County Council in respect of the school) are considering circumstances where sprinklers may be appropriate. The development will not include buildings above four storeys in height and fire safety risks are not considered abnormal in this instance. Further liaison will take place with the Fire Service as part of reserved matters applications.

## **MOVEMENT AND TRANSPORT**

- 6.113. As access is a up for full consideration in this application, a very detailed process of consideration has taken place in respect of the access points directly into the development, the traffic impacts on the wider highway network and the sustainable connections that the development can make with surrounding communities, services and facilities. The access points of the masterplan were very much integral to the design process and are largely framed around the facilities and open spaces on site. However, they have also been designed and located to best serve the comprehensive development and to create safe accesses in locations which will appropriately distribute the traffic generated by the development.
- 6.114. The Council has worked collaboratively with the County Highway Authority to deal with this area of consideration efficiently and substantial time has been spent with the Highway Authority and applicants to arrive at an agreeable position. There are areas where the Council remains in disagreement with the Highway Authority, particularly due to the approach that they have taken to assessing the application. Based on independent advice and the latest support for the proposals from the Highway Authority (who recommend that the application should not be refused on Highways grounds) the Council can take a more optimistic view on the highways impacts of the proposal.
- 6.115. Policy SP20 recognises the ability to accommodate up to 2000 homes on the site with the need for highway improvements. Specifically its states that measures to manage impact on the local road network include improvements to the A12 between its junction with the A1214 and Seven Hills Interchanges and to the A1214 and Foxhall Road corridor are an infrastructure priority for development on the site. This is based on supportive evidence that fed into the examination of the Core Strategy from the County Highway Authority and Highways England. The 2014 Suffolk

Coastal Infrastructure Delivery Plan produced for the CIL examination also considered the A12 and A14 improvements necessary and estimated costs for the planned 7,900 homes for the District, including 2000 on the application site.

6.116. Paragraph 32 of the NPPF states that:

*All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:*

- *the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
- *safe and suitable access to the site can be achieved for all people;*
- *and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*

6.117. The application is accompanied by a detailed Transport Assessment (TA) which has been informed by a traffic model, developed by the applicants using the County Council's existing traffic data. The model has been thoroughly assessed by the Highway Authority's independent expert modelling consultants who have validated the model. A traffic model is the most robust tool that can be used to predict traffic flows, capacity and effects. It includes sensitivities to ensure that mitigation seeks to adequately address potential future traffic levels and it includes a wide range of committed sites that may or may not come forward in that period. The modelling has enabled the proposed access points and highway mitigation to be designed around expected traffic flows. It is also important to recognise that the modelled traffic effects of the development are judged as they would be in 2027 with a completed development. This scenario is set against reference cases of: the traffic in 2027 without the development taking place; and, the traffic in 2027 with the development taking place but without the mitigation. It is not a comparison of the proposed traffic with the current level of traffic. It is also not appropriate to consider the impact of 2000 homes beyond 2027 as that is the end of the current Local Plan period. The Local Plan review will plan beyond 2027 and any Transport Assessment or study for allocations proposed for the Local Plan review will need to consider the established effect of planned development at Adastral Park and its mitigation package. It may be necessary for the Council to take a more strategic view beyond 2027 in relation to the highway network and improvements, considering the potential growth scenarios and Sizewell C.

6.118. The TA has been through three revisions since the application was submitted. The original submission in April 2017 was Revision 2. In June 2017 this was resubmitted as Revision 3 following some design changes and modelling development. A further set of amendments led to the submission of Revision 5 in September 2017 and this version remains a valid submission

on the application, however to address junction design amendments requested by the Highway Authority Revision 6 was submitted in November 2017. All revisions have been subject to full consultation and the Highway Authority has provided formal consultation responses to Revision 5 (Appendix 4) and Revision 6 (Appendix 3).

### *Walking and Cycling*

6.119. In assessing the traffic impacts of this development the potential of the site to deliver sustainable modes of transport is fundamental to its ability to be both policy compliant and to mitigate its effect on the highway network. The pedestrian and cycle connections through the site and connecting it to surrounding areas have been leading influences on the planning of this site. It is important not to specifically focus on vehicular traffic in respect of transport considerations. A key requirement of the development, as set out in SP20 is to improve the public rights of way network, including pedestrian and cycle links. The pre-text to SP20 sets out the sustainable linkages which supported the policy commitment to this strategic site, stating:

*“this site provides huge potential and an opportunity to deliver a sustainable development linked with employment provision and close to educational and other social facilities. It is close to and capable of supporting improved public transport provision for the new and existing communities, as well as being well related to the main road network which is capable, with some improvements, of accommodating a development on this scale.”*

6.120. The NPPF confirms that the transport system needs to be balanced in favour of sustainable transport modes giving people a real choice about how they travel. As a core planning principle, it also states that decisions should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

6.121. The site location, its scale and the nature of this proposal enable it to represent an exemplar opportunity for sustainable development. The site is a rare opportunity to co-locate major housing growth alongside a major employment and retail area. In particular the site would wrap around one of the largest employment sites in the County (BT/Adastral Park) and an area for substantial employment redevelopment. Much as the development of Martlesham Heath and the expansion of Adastral Park happened concurrently, this development proposal also provides a key opportunity for very local employment growth in a similar manner. Therefore the physical links between the housing and employment area are essential, along with links to nearby communities, particularly west of the A12.

6.122. Despite the Highway Authority placing much emphasis on the need for a Travel Plan, their review of the merits of sustainable connections of this site is very limited. It is unfortunately heavily weighted towards consideration of vehicular traffic over the ability of this site to promote walking, cycling and

public transport. The Highways Authority were wrongly dismissive of the site's sustainability within their October response and silent on it in their final response. They have provided no recognition of the proximity of the site to major employment, retail facilities and substantial on-site education. This is one area where the District Council disagrees with the pessimistic position taken by the Highway Authority.

- 6.123. The effectiveness of sustainable transport into and out of the site is reliant upon good quality connections. The essential route for the site to connect to, in order to create safe and sustainable walking and cycling routes, is that of Barrack Square and Gloster Road. Off these, all services and facilities and employment opportunities can be reached. The application will address this through the creation of a new dedicated walking and cycling route along Barrack Square from the north-west corner of the site. This route was proposed following the Council's request and it would be a significant and essential improvement to a route which does not currently have a continuous pavement. Through the section 106 agreement, a right of way creation process would also be funded to formalise an exiting path from the site onto Betts Avenue, to the north of the site and to improve the footpath leading north to Felixstowe Road. This could create direct routes to Gloster Road, the existing A12 footbridge and to the retail area to the north. Later into the development the Northern Quadrant road would provide a dedicated cycle lane and pavements leading to Gloster Road. This combination of routes, from the first phase of development will connect a sustainable non-vehicular transport network with the surrounding communities and uses. Major employment facilities, retail and existing healthcare and communities will therefore be within sustainable walking and cycling distances of all future residents. These routes will also create connections from Martlesham through to the new school and other facilities on the development site, a route which will also be well served by the new/expanded bus service.
- 6.124. The Design and Access Statement includes number of illustrative street sections for the Boulevard through the site and some edges of the site. These show dedicated wide pavements and cycle lanes to enable on road and roadside pedestrian and cyclist movement through the site in addition to the extensive SANG open space routes through and around the site. The combination of these road and open space routes, which are largely fixed by elements of the submission, would create an extremely well connected network of on-site routes for sustainable transport within the development and leading out of it.

#### *Internalisation*

- 6.125. Within its boundaries the site will also be comprehensively developed with substantial on-site facilities through its provision of an all through school, local centre with shops, services and community centre and substantial open space, recreation and sports provision. With the majority of this located



centrally on the site, all proposed homes would be within an easy walking distance of dedicated day-to-day community facilities and services.

- 6.126. The on-site proposals, along with the substantial immediately adjacent employment and retail facilities would create an agreed 'internal area' where residents would not need to use a private motor vehicle for transport or would not need to travel by car on the main highway network. For purposes of the Transport Assessment, the area of the site and that of Adastral Park, the employment area and Beardmore Park is seen to be an internal area. This forms a principle known as internalisation for the purposes of the Transport Assessment and Traffic Modelling. The Transport Assessment is based on a 30% internalisation discount to vehicular trips generated by the site due to the expectation that the necessity for trips on the main highway network would be reduced by residents working, being educated and shopping in the internal area. Whilst the Highway Authority agree that the 'internal area' of the site extends beyond the site boundaries, the benefit that this would have to future proposed traffic in the area has not been agreed by the Highway Authority.
- 6.127. This disagreement between the applicants and the Highway Authority has led to the Transport Assessment being submitted with a future year 'with development' scenario based on the 30% internalisation discount. As the Highway Authority have been clear that they do not agree to this, the applicants have accompanied the TA with a sensitivity test which completely removes the internalisation discount. The Highway Authority's support for the application is therefore hinged on the outcomes of the agreed sensitivity test, rather than that proposed in the TA.
- 6.128. Prior to the submission of Revision 6 of the TA the Highway Authority provided an interim response which essentially objected to the application and its mitigation proposed. Whilst constructive dialogue continued between the Highway Authority and the applicants it was considered necessary for officers to carefully scrutinise the applicants' proposals and the Highway Authority's response independently. Therefore a national transport consultancy was instructed by the Council to review the approach to the TA, the highways safety of the proposals and the position taken by the Highway Authority. This independent advice in relation to Revision 5 of the TA will be made available in advance of the Planning Committee Meeting.
- 6.129. The current advice provided by the Council's consultants states the following in respect of the internalisation position:
- "The TRICS trip rates that were selected as part of the TA did not already include a trip internalisation discount. Given the mixed-use nature of the proposed development it is appropriate to apply a discount to take in to account trip internalisation between land uses. Provision of a more detailed evidence-base would help support the proposed 30% internalisation discount that was applied to the residential and employment trip generation. Based on the evidence presented in the TA it is considered that a more reasonable assumption would have been to apply a 20% internalisation discount to the residential and employment uses – since this accords with the proportion of*

*Martlesham Ward residents that travel less than 2km to work based on Table 4a of the TA.”*

- 6.130. In addition, the independent advice sets out that the following in relation to a Travel Plan discount:

*“The principle of applying a reduction to the number of single occupancy car driver trips of between 10% and 20% is therefore supported by national and local Travel Plan guidance. It is therefore considered appropriate to apply a discount to the proportion of car driver trips of between 10% and 20% to the total level of trip generation associated with the proposed development.”*

- 6.131. The Highway Authority do not object to the current proposal and the mitigation proposed in Revision 6 of the TA, however, they do maintain their reliance upon the sensitivity test and disagree with the internalisation discount. The District Council must ultimately make the decision and balance of any impacts resulting from the development. In this development the worst-case scenario (sensitivity test) has been found to be policy compliant by the Highway Authority as less than severe impact. The impact of the TA position (with internalisation) would be better than that of the sensitivity test and far from severe. Based on the independent advice that the Council has received, there is justification for applying a 20% internalisation discount and 10-20% Travel Plan discount to this site and proposal. Whilst this is not as optimistic as the TA it is a far better position than the worst-case scenario sensitivity test. Officers are therefore confident in viewing the proposed traffic impacts more optimistically than the worst-case scenario interpretation made by the Highway Authority. This site has the ability to perform well in terms of reducing its traffic impact on the main highway network against the reference case through encouragement of sustainable transport and short internal trip movement within its internal area.

- 6.132. Based on both Revisions 5 and 6 of the Transport Assessment, the impacts of the development on the flow and capacity of the Highway Network would not be severe.

#### *Highway Mitigation and Vehicular Access Points*

- 6.133. It is acknowledged that a comprehensive development of 2000 homes will generate a substantial amount of traffic on the highway network. That was recognised when the council committed to the delivery of up to 2000 homes in the adoption of the Core Strategy. The County Highway Authority and Highway England (Then the Highways Agency) were both involved and supportive in the consultations for Core Strategy. It was acknowledged by all that the integration of the development into the highway network would require significant improvements to the A12 deliverable through strategic development of this scale. At that time the previous BT application was in hand for some consideration of the effects and mitigation required. That application proposed improvements along the A12, consisting of a series of signalised crossroad junctions between Foxhall Road roundabout and the

Park and Ride roundabout. Delivery of some of the previous mitigation proposal was not feasible due to land ownership around junctions.

- 6.134. At pre-application stage the current applicants consulted on a similar approach to the BT application in public exhibitions held locally earlier in the year. Parallel to that consultation process the applicants were undertaking their modelling and junction designs and this evolved into a different approach to mitigation.
- 6.135. The package of junction mitigation proposals originally submitted for this application (Revision 2) consisted of expanded A12 roundabouts, largely retained without signals. This remained the form of mitigation proposed in Revisions 3 and 5 of the Transport Assessment, which were submitted for consideration over the course of the application and consulted on. Revision 5 of the TA remains a submitted document; however, Revision 6 has been provided by the applicant as an alternative consideration and has also been consulted on.
- 6.136. The Seven Hills roundabout (A14 junction 58) would include some lane expansion and signalisation on the roundabout, the northbound, southbound and westbound approaches. That junction is the responsibility of Highways England, being part of a trunk road. Proposals for this junction have been largely similar through all revisions of the TA and submitted proposals are very similar to those required by Highways England as part of the adoption of the Felixstowe Area Action Plan (which took 2000 homes at Adastral Park into account). There has been extensive engagement with Highways England through the application to provide the necessary modelling information and amendments in order to agree the mitigation proposed for this junction. The final response from Highway England was not available at the time of writing this report but it is expected by the date of the committee but positive feedback had been received and it is unlikely to raise an objection to the proposals.
- 6.137. The main access into the site off the A12 would be in the form of a signalised T-junction. This would introduce signals to the north and southbound lanes and the Boulevard main road through the site. This junction would differ from the current range of roundabouts which dominate the character of this part of the A12 corridor. It would be a more urban form of junction consistent with change in urban character to area as a result of the development. This junction incorporates a dedicated right turn lane on the north bound side of the A12, and a left turn lane to the southbound. These later additions to the proposal increase the capacity of the junction and maintain the flow of the existing two lanes.
- 6.138. Revision 6 of the TA proposes signalisation and lane widening improvements to the roundabouts and approaches of Junctions along the A12. Those being: the Foxhall Road junction with A12 roundabout; the Eagle Way and Gloster Road junction with A12 roundabout; and, the Eagle Way and Anson Road junction with A12 roundabout. Whilst these improvements increase lanes approaching most of these roundabouts, their physical expansion would not be as great as that proposed in Revision 5. The addition of signals enables a

more controlled corridor to the A12. Despite the lanes lost in going from Revision 5 to 6 designs and the added signals, the TA and the Highway Authority's assessment demonstrate that the revision 6 proposals would not reduce the capacity and flow of the highway network more than that achieved in Revision 5. It is highly regrettable to the District Council that the extensive lane widening proposed in Revision 5 cannot be supported by the Highway Authority as this would better future proof this strategic route. Based on the current Highway Authority support for Revision 6, the development would progress based on the mitigation proposals in Revision 6.

- 6.139. As set out in the NPPF, the test to be applied to the traffic implications of development is whether the impact would be 'severe'. That severity should be considered comprehensively across the whole highway network and not be based on single junctions alone. In this case there may be journey time improvements at some junctions and reductions at others. The Highway Authority do not object to the application and confirm that the effect of this development would not be severe. They also state that *"the revised A12 mitigation schemes which accompanied the Revision 6 offer some traffic capacity benefits, which are likely to result in improvements to the network performance across the modelled area. Therefore, some of the significant localised projected impacts of the full development traffic are likely to be slightly improved by the revised junction mitigation schemes"*.
- 6.140. Concerns have been raised locally regarding 'rat-running' and the effect of the development on minor and rural roads. Routes beyond the A12 and A14 do not require specific improvements proposed through the TA and that is agreed by the Highway Authority. These routes were not within the scope of the TA which the applicant agreed with the Highway Authority prior to submission and are not routes where the development is considered to have a significant effect. The Highway Authority has previously suggested that it would seek to mitigate future effects on non-strategic roads through section 106 funds. The final response refers to this obligation but the Highway Authority have not yet been specific about what those funds may be and where or how they may be spent. The Council will explore the potential of this fund with the Highway Authority and applicants to determine the extent to which it may be relevant to the development and capable of forming an obligation in the section 106 agreement.

#### *Highways Safety and Speed Reduction*

- 6.141. All of the accesses and junctions to be improved have been subject to Stage 1 Road Safety Audits. These independent audits were commissioned by the applicants and submitted as part of TA Revisions 3, 5 and 6. All of the audits demonstrate that the junctions are safe at current speeds and where issues have been found then appropriate designers responses are provided. Earlier mitigation proposals, including the site access were also subject to independent audits instructed by the Highway Authority. These were consistent with those instructed by the applicants in terms of safety compliance.

- 6.142. Beyond approval of highway mitigation, detailed plans will be developed through the Section 278 process required to implement the works to the highway. This process will also involve a number of further Road Safety Audits to ensure the detailed designs are safe and that they are adapted where necessary.
- 6.143. The two Ipswich Road accesses on the southern boundary of the site would not present a capacity issue or adversely affect the flow of traffic along Ipswich Road. Concerns have been raised locally in relation to the safety of this junction and road. There is some confusion that they are referred to as priority junctions as they provide 'priority' to passing traffic. In some objections this has been interpreted as them being primary accesses. They are secondary accesses, with the A12 junction being the main access into the site and later into the development the Northern Quadrant route being a further primary access.
- 6.144. Since the application was submitted the applicants have agreed to bring forward the A12 site access as part of phase 1. The specific trigger points for all accesses had not yet been agreed at the time of writing the report but it is likely to be available by the Planning Committee meeting. Initially the east most Ipswich Road access will provide a key access for early phases and construction traffic, particularly as it is the existing quarry access. Further into the phasing of the development both Ipswich Road accesses are likely to reduce in use through resident behaviour and design. The western Ipswich Road access will be subject to design features in the street layout as part of the reserved matters application to reduce its attractiveness as an access. The applicants have agreed to a condition requiring the downgrading of that access as part of the relevant reserved matters application. The accesses and increased use of Ipswich Road/Newbourne Road are judged to be safe.
- 6.145. The application as submitted has a TA based on the implementation of accesses and highway mitigation at existing speed limits. That includes a 70mph speed limit on the A12 and 60mph along Ipswich Road. The modelling and safety audits are based on existing speed limits and there are no adverse impacts on safety or traffic flows at such speeds. However the applicants would not wish to maintain these higher speed limits and they have agreed to fund speed reductions on the A12, Foxhall Road and Ipswich Road.
- 6.146. It is recognised by the Council, Highway Authority and applicants that a reduction in these speeds is very much desirable. It will certainly improve safety, road noise and some of the flow of traffic. However a planning permission cannot implement a reduction in speed limits. That requires a subsequent Traffic Regulation Order (TRO) which would be promoted and determined by the County Council. The applicant has agreed to pay the £10,000 costs for the County Council to implement the order. The Highway Authority has already sought the initial views of the County Council's Speed Limit Panel in relation to the sought speed reductions. The panel were agreeable to supporting the reductions subject to further details at a later stage and an amendment of the proposed A12 speed limit in front of the site to 50mph instead of the original proposal for 40mph. The Panel decided that

a 50 mph speed limit throughout the Martlesham A12 corridor would balance the road safety of the A12 junctions, with the need to ensure the route was still an attractive strategic link.

- 6.147. Implementation of the speed reduction is only one part of reducing speeds. Actual speeds depend on compliance and some concern has been raised by Suffolk Constabulary about enforcement and compliance. In this respect speed cameras at the site frontage are an option for consideration. The change in character of the A12 would also significantly influence speed and therefore a prominent 3-4 storey A12 frontage is proposed for buildings on the western boundary of the site. This will increase the awareness of entering an urban and residential area which is known to be effective in ensuring speed compliance. Martlesham Heath does the opposite and screens itself from the A12, therefore increasing the potential for drivers to speed up. The applicants are committed to delivering a package of highway works, signage and development which will encourage speed reduction throughout the nearby network.
- 6.148. Therefore, in addition to the proposal not presenting severe traffic flow and capacity impacts, it would also not present highways safety impacts and therefore comprehensively the development would not have a severe impact.

#### *Public Rights of Way*

- 6.149. The site is surrounded and crossed by a wide range of public footpaths and bridleways, these also extend out of the site connecting with other surrounding settlement and the wider countryside. Links such as those to the north of the site support its sustainability with adjacent employment and retail whilst others would be recreational.
- 6.150. The bridleway at the western edge of the site and on the opposite side of the A12 has frequently been raised in representations. This is because it specifically relates to a proposed pedestrian and cyclist Toucan crossing over the A12, integrated into the main site access junction. It has been subject to some revision during the course of the application, moving to a safer position on the north side of the junction and in being altered from a 'Pegasus' horse rider crossing. There has been extensive concern raised in relation to the safety of providing a horse rider crossing and much discussion has taken place in relation to what form of crossing this should be. It is recognised that the site has a bridleway leading through it to the A12 and on the opposite side there is also a bridleway. Before the A12 was built it would have been a continuous bridleway. Bridleways are a right of way for walkers, cyclists and horse riders. It is not currently safe to cross the A12 on a horse and there is a limited amount of horse rider activity in the immediate vicinity of the A12 because of this. The site will generate a substantial population walkers, dog walkers, runners and cyclists. It is highly unlikely to generate any horse riders with horses on the site. It may add to the amount of horse riders in the area with horses stabled elsewhere. The key focus of this crossing needs to be for safe movement of pedestrians and cyclists. Use of

the proposed crossing for horse riders may not be safe and could compromise the overall ability to provide any form of crossing. Therefore the crossing proposed would only be for pedestrians and cyclists.

- 6.151. That one bridleway should not be considered in isolation. The site includes an extensive range of footpaths and bridleways and it has been agreed to upgrade the majority of on-site footpaths to bridleways and to create new ones crossing the site. It has also been agreed to upgrade the footpath leading out of the north of the site towards Tesco and Old Martlesham to a bridleway. Therefore the site will deliver a significant enhancement to the local bridleway network and a variety of new routes for horse riders on the eastern side of the A12. Furthermore the upgrades to bridleways will increase the cycling routes for residents on site to move through the site and beyond to the north. This would all be in addition to the variety of routes through the SANG and the roadside cycle lane along the Boulevard.
- 6.152. Many of the representations received have suggested an alternative form of pedestrian, cyclist and horse rider crossing for the A12. These include a bridge or an underpass. These structures would be disproportionate in relation to the public benefits of bridleway access to the west. Both options would be substantially expensive infrastructure and both would be reliant on a significant amount of third party land on the western side of the A12. The existing routes in the area were closely inspected by officers and the Highway Authority and it was determined that the creation of safe and convenient routes to the existing Martlesham Heath footbridge is the optimum solution for crossing the A12 for the majority of movement. Hence the significant improvements to the route along Barrack Square which have been proposed following the Council's request.
- 6.153. The County Council Rights of Way Team have sought an extensive package of rights of way improvements, upgrades and creations. The majority of these are agreed by the applicants and section 106 contributions to cover the order making and works are likely to be agreed. The specific obligations and amounts will need to be finalised. Some off site improvements sought by the County Council have not been agreed by the applicants. These include improvements to the east of the site and relating to sensitive sites which are not deemed necessary in the first instance. They would also conflict with the prioritised off site recreational avoidance intentions of the Habitats Regulations Assessment and proposed on-site mitigation.

#### *Public Transport*

- 6.154. As a development of 2000 homes it will be necessary to connect the site to the local bus network and it will be a desirable addition to local bus service customer base. The site would provide a through route along the Boulevard between Gloster Road and the A12 and this will add a convenient extension to existing routes or source for a new route. First Buses operate the route 66 bus service which circulates around Kesgrave, Rushmere, Martlesham and Ipswich town centre. That route already runs along Gloster Road between

05.20 and 23.59 and it runs every 20 minutes throughout the day. Ipswich Buses also operate a similar route with less frequency.

- 6.155. Subject to further discussions, public transport services are to be enhanced through providing additional bus services. Initially the applicants had proposed to work with Ipswich Buses but a fair approach needs to be taken with all operators. Through the section 106 agreement it is expected that the developer will offer contributions to subsidise the service for an initial period from the occupation of Phase 1 of the development until the routes are self-funding.

#### *Travel Plan*

- 6.156. The application is supported by a detailed Travel Plan Framework (TPF) within the Transport Assessment. The TPF establishes the initial framework of travel initiatives to be pursued by the developer. It forms a strategy for influencing change in residents and employees travel patterns with the intention of providing a disincentive for nonessential car use to the site. This document will provide a framework for the development of the residential travel plans that will be submitted as part of the reserved matters and secured through the section 106 agreement.

- 6.157. The TPF investigates different methods of transport that can be used to travel to and from Adastral Park and sets targets to encourage a shift away from use of the private car as the main means of accessing the site. The key objectives of the Travel Plan are to:

- Reducing the need to travel by ensuring information is available for the range of facilities available
- Maximise modal shift to sustainable travel
- Reducing the level of car trips at the proposed development
- Promoting healthy lifestyles and sustainable, vibrant local communities
- Encouraging good design and providing safe pedestrian and cycle access to the site
- Ensure development and implementation of a series of site specific smarter modal choice measures that support and promote sustainable travel
- Ensure an ongoing process for the coordination, monitoring and management of the implementation of the measures and to review changes to ensure achievement of modal shift.

- 6.158. The implementation of the Travel Plan will be secured through the section 106 agreement and the applicants are committed to a bespoke on-site delivery of this requirement, including a Travel Plan co-coordinator based on the site. This would also link closely with the community cohesion strategy which is discussed later in this report. As previously considered, national and County guidance set out to achieve modal shift to sustainable transport of between 10-20% and considering the timespan of the delivery of this site, that is a realistic approach to take.



### *Highways Conclusion*

- 6.159. The proposal represents a highly sustainable development where the internal movement of residents within the site and immediate area would enable a significant reduction in reliance upon private motor vehicles. A detailed pedestrian/cyclist strategy has developed with a range of key pedestrian and cycle links within and outside of the site. The site will also deliver a new/extended bus route running through the site connecting existing communities and employment with the future population, its on site facilities and a substantial all-through school for the area.
- 6.160. The development will contribute a substantial amount of traffic to the highway network and that will be mitigated through carefully designed and safe improvements to junctions. All site accesses will be safe and the application will deliver funding to implement speed limit reductions and management of speed along the A12, Ipswich/Newbourne Road and Foxhall Road. The proposal has been subject to a considerable amount of transport assessment and scrutiny, including independent advisors to the Highway Authority and Highways England and an independent assessment carried out for the Council. Following detailed and collaborative highways modelling process and independent road safety audits, the Highway Authority conclude that the development and its significant highways mitigation would be safe and would have an acceptable effect on the highway network. It is regrettable that a pessimistic approach has been taken by the Highway Authority which may have stifled the betterment that could be achieved for the highway network through this application. The potentially greater capacity improvements set out in Revision 5 of the TA are now unlikely to be delivered, however Revision 6 provides a suitable, safe and less than severe mitigation package to accommodate this level of growth.

### **DESIGN AND LAYOUT**

- 6.161. A requirement of Site Allocations and Area Specific Policies Document is to provide a masterplan for the application site alongside the outline planning application. Masterplanning is an effective way of drawing together all of the guiding design principles of a site along with the parameters fixed by the Environmental Statement. A detailed pre-application process to guide the masterplan commenced in late 2016 and this also included public consultation events. As a result of this engagement a number of public and officer influenced revisions took place.
- 6.162. That process also enabled officers to guide the manner in which design principles were presented in the submission and how they could be established at outline permission stage to guide and control future reserved matters applications. Initially the opportunity for a subsequent design code strategy was discussed and officers researched this approach extensively,

including meeting with officers of another District dealing with a similar sized development. It was determined that a requirement for a design code document between outline and reserved matters stage would be overly prescriptive, potentially very time consuming therefore affecting the speed of delivery of homes and unnecessary in this case due to the single land owner. It was also agreed with the applicants that an enhanced amount of design information at outline stage would give greater confidence to the Council and communities about the nature of the development, the mitigation proposed and the overall landscape and visual impacts.

6.163. The result was an agreed approach to provide a detailed Design and Access Statement alongside an illustrative masterplan and a set of Environmental Statement Parameter Plans. Officers promoted a unique approach to the Design and Access Statement which was well received by the applicants and incorporated. Officers sought to establish detail in relation to the edges of the site, open spaces and key routes through a series of 'character bands' to the site. These are presented in the Design and Access Statement and each band establishes character, place making elements, guidelines, sections and sketches. When it comes to future reserved matters applications, which may be submitted by housebuilders rather than the applicant, the character bands associated with each area of development will guide the design of that area.

6.164. A detailed view on this approach and critique of its success is provided by the Principal Design and Conservation Officer as Appendix 1 and it should be read as the Council's overall assessment of the design and layout of the presented proposal. This endorses the design approach submitted and concludes with an NPPF assessment of the proposal, stating:

*"The Government attaches great importance to the design of the built environment and has articulated how this is achievable at Section 7 of the NPPF, detailed particularly in paragraph 58. This detail is, perhaps, more applicable to the reserved matters applications that we shall receive subsequent to any approval here. Of more direct relevance to the current application is paragraph 59 in respect of the use of design codes or design policies. Analogous to these is the Design and Place-making section of the DAS which includes within its sections on Green infrastructure, Built form and Edge treatments, aspirational policies for characteristics, land use, building heights, building frontage, placemaking, mobility and public realm (to give examples). These, in conjunction with the parameter plans, provide the level of guidance that paragraph 59 suggests is appropriate and which I judge to be broadly acceptable."*

6.165. It should also be recognised that Suffolk Preservation Society (SPS) have provided a comprehensive consultation response. SPS are a well respected society who actively engage in the planning process and regularly comment on major planning applications. In this case they acknowledged the importance of this site, its sensitivities and the needs for a high quality design to the development. Therefore they contracted Essex Place Services, a leading provider of integrated environmental assessment, planning and design services to provide a response on their behalf. This independent

design scrutiny is welcomed by the Council. In their conclusion they endorse the collaborative approach to the Masterplan and Design and Access Statement, stating:

*“In summary, the Outline application includes some very interesting and innovative precedent work which we would expect to be continued by the Developer as part of the full application. The expected standard of design should be high and of outstanding quality, integrating a large scale new community with retail and educational facilities with enhanced green spaces and natural landscapes in accordance with the principles outlined in the supporting DAS.”*

6.166. Aspects of the Design and Access Statement will be subject to conditions requiring the reserved matters to be substantially or broadly in accordance with the parts of the document. This will provide the Council and community with confidence that the high quality approach submitted will follow through to final designs. The proposal provides a good masterplan to support the Council in considering what should be high quality reserved matters designs.

6.167. The Principal Design and Conservation Officer has also provided some long term design review aspirations for the reserved matters phases, as set out in Appendix 1 and below:

*“In agreement with the applicant and agent, we have avoided the requirement for a more prescriptive level of detail or coding on the basis that we wish to facilitate a degree of flexibility and creative freedom in the approaches to the future development of the site. As an alternative way of providing the infrastructure needed to ensure a continuously high quality of design, we could consider the following:*

- *Applicants should show evidence of how their development proposal performs against the requirements of the third edition of Building for Life 12 (January 2015) for well-designed homes and neighbourhoods;*
- *Applicants should willingly engage the services of the RIBA Suffolk Design Review Panel or similar at key stages of the design development process;*
- *Applicants who are major developers should consider partnering local design practices for the production of high quality bespoke site-specific schemes; and*
- *In determining applications, great weight shall be given to outstanding or innovative designs which will help raise the standard of design more generally in the area.*

*These suggested requirements are inspired by the NPPF and industry good practice and I commend these to you for your serious consideration. These should help ensure, through their application, that, whichever landowner, developer, planning or design officer are involved over the duration of this site, the quality of design enjoys the most prominent level of importance in everyone’s consideration and that the planning authority has the tools to resist poor or mediocre design.”*

## LANDSCAPE

- 6.168. As a site of 113 hectares this site will have a notable effect on the landscape of the area. The majority of the site will be urban in character due to the quantum of development but it also presents a number of opportunities to create natural landscaped spaces and edges. It is noted that a large number of the objections received have raised concerns about the effect that the development would have on the landscape. Concerns include the width of landscaped buffers around the edges of the site needing to be 30 metres wide rather than 20 metres and the need for a deeper and heavily planted screen to the south east corner of the site.
- 6.169. Considering the size of the site it is surprisingly well enclosed by existing boundary trees, topography and other development and its wider visual impacts on the landscape are largely limited to views from the south east and along the A12. However, this is located within 150 metres of the edge of the Area of Outstanding Natural Beauty (AONB) and the development will affect views from within AONB to the west. The Ipswich Road edge will also become more urbanised in character compared to its relatively rural nature at present. From the A12 a more predominant urban character would be introduced, extending the southern extent of urban form on the east of the A12 approximately 500 metres further south and contrasting with the well screened character of Martlesham Heath opposite.
- 6.170. In respect of the landscape impacts, the application is accompanied by a Landscape and Visual Impact Assessment (LVIA) which considers the impact of the development on the landscape from a wide variety of viewpoints compared to the existing landscape. Where necessary mitigation is proposed and this is most essential on the south east corner of the site where the development is closest to the AONB. The LVIA has been considered by the Arboricultural and Landscape Manager and his conclusion is provided below:

*“The site is not considered to be a ‘Valued Landscape’ in the terms of NPPF109, but is considered to be of ‘Ordinary’ character in relation to its physical attributes and as assessed under the indicators shown in Box 5.1 GLVIA3.*

*Overall the proposals have been assessed as having a long term Moderate Adverse effect on the landscape character of the site, and also the same on the relationship with the existing settlement edge. This is a result of the scale of the proposals which will see the introduction of residential development into a mature landscape framework. However, such effects are offset by the restoration of existing mineral workings and the introduction of substantial new green infrastructure.*

*Provided that, as a planning authority, we can secure high standards of building design and high quality, well specified landscape mitigation proposals, I agree with the report that there should be no significant adverse effects arising that will justify refusing the proposal on landscape related grounds.”*

- 6.171. A further important consultee in respect of the landscape is the Suffolk Coasts and Heaths AONB Team who have provided detailed responses to the application. The AONB Team were engaged at pre-application stage their constructive input assisted in guiding the submitted proposals. One area where they were initially concerned was the south east corner of the site seeking a greater amount of planting. The council's view is that the development should not be screened from the landscape but that there should be filtered views of the development through a belt of trees and planting in this corner space which would be of a width of between 100 and 30 metres.
- 6.172. Subsequently the applicants submitted a supporting letter and an aerial view computer generated image of the corner to demonstrate the landscaping approach that could be achieved. This better demonstrates the width of the space, the substantial amount of planting that could be provided and the natural and rural approach to landscaping that would be delivered. The AONB Team have since responded confirming that the submission addresses their concern about the generosity of space in this location for appropriate mitigation. At reserved matters stage they wish to contribute to the conversation about the quantity of hedgerow and tree planting in that area.
- 6.173. It should also be recognised that this corner of the site would have the lowest density of development and lowest height of buildings, fixed by the ES parameter plans. This landscaping is also proposed to be delivered in the first phase of development, whilst the housing would be delivered in one of the final phases, therefore allowing a number of years for the trees and hedgerows to establish.
- 6.174. The AONB Team have also suggested securing additional off site planting in the adjacent field to the east of the site, along Ipswich Road. That land is outside of the application site and outside of the applicants control and therefore it cannot be secured by this application and based on the Arboricultural and Landscape Manager's advice and the LVIA, it is not considered necessary to mitigate the landscape impacts of the development.
- 6.175. In respect of the on-site and surrounding trees, the application is supported by an Arboricultural Assessment. This has been considered by the Arboricultural and Landscape Manger who concludes that: *"it is anticipated that there will be trees that need to be removed to accommodate the proposed development. The full extent of these will ultimately depend on the final detailed submissions so to a degree are indicative for now within the scope of the outline application. Clearance of the trees on the Scheduled Ancient Monument is also included in the proposals. Many of the proposed tree removals are poor quality trees with limited life expectancy, with the rest being moderate quality. It is inevitable that a development of this scale will result in the loss of some trees to a greater or lesser degree. Accepting this, it is important to secure sufficient new planting that integrates well with the new development proposals and which will have a long term sustainable future. Indications of such planting are included in the received indicative site layout plans and full details can be secured at the detailed application stage. Such is*

*the importance of such new planting that it should be part of the planning application details and not secured subsequently by Condition”.*

## **HOUSING**

- 6.176. NPPF (paragraph 47) states that in order to significantly increase the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as this is consistent with other NPPF policies. This is followed through into Policy DM2 (Affordable Housing) of the adopted Core Strategy.
- 6.177. Policy DM2 expects 1 in 3 homes to be affordable housing unless its provision is not required due to:
- (a) Lack of identified local need in the area;
  - (b) Site conditions, suitability and economics of provision.
- 6.178. The area and District certainly have an identified need for affordable housing and this site has the greatest potential in almost 20 years to make a considerable contribution to addressing that need. Affordable homes are provided by developments at a cost price or at a low profit and typically purchased by Housing Associations to release to the affordable housing market.
- 6.179. In a development of this scale, irrespective of the viability position, it is essential that viability is appraised in order to ensure that the site is deliverable against its infrastructure, affordable housing and section 106 contributions. The applicants have therefore submitted a Viability Report which details all development costs, expected sales revenue, developer's profit and land value. As this includes commercially sensitive information it is a confidential document. Members of the Planning Committee have previously been briefed, in a closed session, on the viability process and have reviewed the applicants viability report and the Council's independent advice.
- 6.180. In order to deliver the 2000 homes on this site the scale of infrastructure requirements necessary to support development adds substantially to the development costs of the scheme. As much of the site is a quarry, the re-profiling and compaction of the land to create a development platform will also involve a huge amount investment. The developers must also make a profit, otherwise the development would not take place. In this case the submitted report incorporates a developer's profit which the Council's advisor has confirmed is a normal and not excessive for a scheme of this nature. The land value also has to be factored in. That is not based on what the owner of the site paid for the land or its current value. It is based on an uplift in current value of the land (as agricultural land) and that is necessary to incentive the release of the land for development. The expected sales revenue is also assessed based on a comparison with actual new build sales in the area and for the calculations this is refined down to expected price per square foot. All of the above considerations were submitted to the council and have been

independently scrutinised and agreed by the Council's consultant. In this case the Council utilised an international consultancy who are leading experts in the assessment of development viability.

- 6.181. In doing this, the advice set out in the National Planning Policy Guidance (NPPG) has been taken into account. The NPPG advises that the scale of obligations and policy burdens should not be to a level which threatens the ability of sites identified in a plan to be developed viably (Para 001 from NPPG – Viability). A site is said to be viable if the value generated by its development exceeds the costs of developing it and also provides sufficient incentive for the land to come forward and the development to be undertaken (Para 016 from NPPG – Viability).
- 6.182. The NPPF is also clear that in assessing the viability of a site the “competitive returns to a willing landowner and willing developer to enable the development to be deliverable” need to be considered (para 024 from NPPG – Viability). It is noted that this return will vary significantly between projects to reflect the size and risk profile of the development and the risks to the project. A rigid approach to assumed profit levels should be avoided and comparable schemes or data sources reflected wherever possible. The Council's advisers have advised that the viability assessment makes an appropriate allowance for profit.
- 6.183. The viability exercise has concluded that the adopted maximum policy affordable housing level of 33%, with a typical tenure mix is not viable for this scheme. Varying levels of affordable housing and tenure mixes have been considered to reach an optimum level of affordable housing along with a consistent proportion of affordable homes delivered through out all the phases of development of the site. The minimum level of affordable housing which is considered to be viable for this development is 23.3%. The applicants have agreed to uplift the proportion of affordable housing to 25% (500 affordable homes) subject to that proportion being fixed for the whole development and there being no future review. The Council agrees to this on the basis that there is also a risk that a review process can result in the proportion going down, particularly if there is a change in the economy or market place.
- 6.184. In arriving at the 25% proportion, the mix of tenures to be delivered on the site has been diversified to ensure that an optimum quantum is achieved and also so that a variety of affordable housing needs are addressed. Therefore the following mix of tenures is proposed:

25% Affordable Rent

This is typical affordable/social housing let by registered providers to households who are eligible for social rented housing. Rent is subject to controls and should not be more than 80% of the local market rent.

25% Intermediate Rent

Housing that is provided for rent at a rate above social/affordable rent but below market levels for eligible households.

25% Shared Ownership

Properties where a proportion of the house is purchased whilst the rest is rented from the Registered Provider. This housing is made available to those with a priority need.

#### 25% Shared Equity

Properties for sale on the open market at a discounted price of 75% of open market value and made available to those with a priority need. The 25% of ownership is retained by the Registered Provider/Council and rent is not paid on that proportion. The property would continue to be sold at a discounted rate in subsequent market sales and the registered provider/Council would maintain its 25%.

- 6.185. In addition to this agreed mix of tenures the applicants have agreed to minimum floor areas for the affordable units and have increased the normal space standards by 10%. This is a valuable addition to these homes, particularly as a substantial proportion would be 1 and 2 bedroom units, therefore providing added space to enhance living and storage space available to tenants/owners. This will be secured through the section 106 agreement.
- 6.186. Across both the affordable and open market housing, the applicants propose to meet the housing target size mix set out in the Core Strategy at table 3.6 associated with Policy SP3. Subject to an agreeable condition with the applicants a proportion of 'Lifetime Homes' may be secured within the housing mix. These are homes of an improved form of accessibility and which may be adaptable as occupant's accessibility needs change.
- 6.187. In summary, the viability of the site has been independently assessed and agreement reached as to a viable level of affordable housing which can be achieved alongside the necessary infrastructure contributions and provisions. Whilst the proportion of affordable homes is less than the maximum that can be delivered in optimal viability situations the proposal remains policy compliant and the delivery of 500 affordable homes across the site is a still a substantial contribution to housing needs. Overall the scheme is considered to be in accordance with the provisions of policy DM2 of the adopted Core
- 6.188. **EMPLOYMENT**
- 6.189. Based on the land use parameter plan and application description the proposed development site predominantly consists of residential development but it does include a dedicated site for B1 business uses on the southern boundary. This 0.6 hectare site would be immediately adjacent to a recently completed development of business units, known as Brightwell Barns. This would be a logical extension to a successful employment site and would integrate the employment use with residential development in a positive manner.
- 6.190. Furthermore the development site will facilitate the opportunity to redevelop an out dated and under used area of Adastral Park, known as the Northern Quadrant, due to the proposed road into the north of the site. The road will open up that area for re-development and one of the applicants has the



option to purchase and deliver the future employment growth with BT. As a site that is likely to come forward for development it has been included as a 'committed development' to enable cumulative assessment in the Environmental Statement. When that area does come forward it will be subject to its own planning application and associated assessments. This will include a separate transport assessment and depending on the trips generated that could lead to the need for further later highway mitigation.

- 6.191. In addition to the above employment areas, the site will provide employment opportunities within the Local Centres where shops and community facilities will be based, therefore creating local employment which is likely to benefit those living on the site. The school will also generate a substantial number of employees.
- 6.192. In the construction of the development jobs will be created in the local construction industry and many construction works could be employed on the site for a considerable number of years. The economic benefit of this should be given great weight.

## **DRAINAGE AND UTILITIES**

### *Surface Water Drainage*

- 6.193. The application is accompanied by a Flood Risk Assessment (FRA) which has been thoroughly considered by both the Environment Agency and Suffolk County Council as the Lead Local Flooding Authority. The entirety of the site is within Flood Zone 1 and therefore it is not an area at risk of fluvial or coastal flooding. With development of this scale and the extensive hard surfaces, roads and roofs, the site still presents the potential to contribute to surface water flooding in the area or to cause localised surface water flooding on the site. The site lies on a predominantly permeable ground, with large areas of the site having been stripped back to sand and gravel and the entire site is underlain by a permeable Red Crag geological formation.
- 6.194. The FRA promotes, within the main body of the text, a series of proposals that will be employed to ensure post development situation is acceptable and that residual flood risk is managed. The following list summarises the main proposals that will adequately control residual flood risk:
- All development is to lie within Flood Zone 1 / Zone A.
  - Compliance with guidance in terms of flood routing and resilience for new developments.
  - Provision of a multi-tier storm water SuDS management system (see Section 4).
  - Connection to a point of adequacy on the foul water drainage network with completion of necessary downstream
  - Reinforcements to ensure adequate conveyance and treatment capacity (see Section 5).
  - Provision of ongoing maintenance for SuDS features.
  - Adoption and associated ongoing maintenance of development storm and foul drainage system.

6.195. The FRA and its associated site investigations show the land to have a low probability of flooding. Accordingly, the proposed development land is in a preferable location for residential development when appraised in accordance with the national and local policy. The Lead Local Flooding Authority has responded favourably and requests conditions to ensure that an appropriate surface water drainage scheme is implemented throughout the site. There are no physical or geological barriers to this approach being taken.

#### *Foul Drainage*

6.196. The applicants have consulted with Anglian Water regarding the location and capacity of their existing sewerage network within the vicinity of the Site. Anglian Water operates the Foul Water, Surface Water and Foul Rising mains within the vicinity of the proposed development and the foul drainage from the proposed development is within the catchment of Woodbridge Creek FM Water Recycling Centre. It has been confirmed that this currently has capacity to treat the flows from the proposed development. Anglian Water has stated that Development will lead to an unacceptable risk of flooding downstream. However a development impact assessment has been prepared in consultation with Anglian Water to determine a feasible mitigation solution. A condition requiring compliance with the agreed drainage strategy has therefore been requested.

6.197. The detrimental effect to the sewerage system therefore requires a mitigation solution. Anglian Water has provided mitigation solutions to prevent detriment to the existing sewerage network performance during a 1 in 30 year critical duration storm event. The proposed solutions, at a cost to the developer, comprise of:

- 1) Providing storage of 352m<sup>3</sup> off Barrack Square at Martlesham - B.T. Research SP west of the proposed development.
- 2) Upsizing Martlesham - B.T. Research SP from 25l/s to 50l/s and increasing the existing emergency storage by 237m<sup>3</sup>, west of the proposed development.
- 3) Providing offline storage of 781m<sup>3</sup> off Felixstowe Road at Martlesham - Hilton RD SP, north of the proposed development.
- 4) Providing offline storage of 174.5m<sup>3</sup> in the green area adjacent to Main Road north of the proposed development.

#### *Water Supply*

6.198. The applicants have estimated a total Peak Clean Water Demand of 37.35l/s for the development site. Anglian Water confirms that the proposed development can be supplied from the existing 15" water main. In order for Anglian Water to supply the proposed development whilst maintaining the performance of the existing network, it will be necessary to reinforce the existing 15" main. This will be at a cost to the developer.

- 6.199. Initially the Environment Agency had raised an objection in relation to the capacity for the supply of water in this area, however this was reconsidered and the objection was withdrawn.

#### *Electricity and Gas*

- 6.200. UK Power Networks (UKPN) has been consulted regarding their existing network locations. UKPN operate existing High Voltage (HV), Low Voltage (LV) and 33kV Overhead networks which are crossing the centre of the proposed development. Additionally, HV apparatus operated by UKPN are shown to the south-west of the proposed development which could potentially cross the A12. A total estimated electricity demand for the site of 6,553kVA has been provided by the applicants. The developer will need to cover the cost of a Point of Connection to the Martlesham Primary substation and its reinforcement, along with connections to all homes, business and buildings on the site.
- 6.201. National Grid now known as Cadent Gas has been consulted regarding the location of their existing network in the vicinity of the Site and have not formally responded to the application but have verbally stated that they have no objection and none of their assets would be adversely affected. They have confirmed that they operate a medium pressure gas main to the north-west of the proposed development along the A12, with low pressure gas mains to the north-west within Adastral Park. Further low pressure assets are shown to the west of the proposed development supplying the residential development. They also operates a high pressure gas main approximately 480m east of the proposed development within Waldringfield golf course.
- 6.202. A Total Peak Gas Demand for the Site of 57,100kWh and an annual gas demand of 46,498,880kWh has been estimated by the applicants. National Grid initially responded to the applicant that there is insufficient capacity to the nearest medium pressure main. The applicants have also sought a quote from a multi-utility company, who provide quotations to supply gas and electricity to developments. They confirmed with National Grid at the time that a connection could be possible to the 125mm PE Medium Pressure Gas Main within the footway of Gloster Road, near the bell mouth of Barrack Square up to Year 10 of the development, and no chargeable reinforcement is required. The reinforcement works required beyond that point will be subject to further detailed work with Cadent Gas. Cadent Gas are legally obliged through the Town and Country Planning Act to supply the site with a connection, not to the detriment of the existing public network. Reserved Matters applications will allow the applicants to further advance and understand the specific requirements for improvement and connection.

#### *Broadband*

- 6.203. GTC, a provider of fibre broadband, has provided the applicants with an installation offer for the Ultra-Fast Fibre Optic Distribution Network, with the provision of a single Fibre Integrated Receiver System (FIRS) to the proposed

residential dwellings. GTC has undertaken a detailed network assessment and outline that current speeds available for the future homeowners will be 300Mbps. The offer includes the provision of Freeview, DAB and FM radio and Sky TV from a central dish and aerial array into every property on the development over GTC's fibre optic network.

## **ENVIRONMENTAL CONSIDERATIONS**

### *Noise*

- 6.204. The application includes a Noise Assessment Report which assesses the likely impact of noise and vibration to residential properties. The predicted noise impact from construction activities to existing properties which lie in excess of 150 m from the development is estimated to be 61 Db. This meets the threshold requirement for noise and vibration control on construction sites. Ground-borne vibration is also not considered likely to impact on existing residential property.
- 6.205. Traffic noise has been modelled and predictions in road noise up to the year 2027 have been used to calculate the window glazing at properties adjacent to; the A12 dual carriageway, Ipswich Road and at the proposed school. These noise criteria shall need to be met when windows to rooms are closed and any passive ventilation is open. Properties fronting the main highways will require additional ventilation measures in order to achieve ventilation standards, without the need for windows to be opened. These shall be agreed by condition.
- 6.206. External gardens and amenity spaces are required to achieve a maximum level of 55 dB. This is achievable by shielding, in the form of a 5m high bund and/or acoustic fence or wall adjacent to the A12 dual carriageway and a 2m high bund adjacent to Ipswich Road. It is essential that a design-led approach is taken to this prominent roadside attenuation, being the main frontage of the development site onto the A12. The Design and Access Statement suggests that this will be a high quality landscaped bund/fence. The CGI of the A12 frontage indicates an attractive and inspiring vertically planted wall. This may not be the most practical solution in the long term but it sets a design standard to aspire to in the future reserved matters applications.
- 6.207. In order to minimise the impacts of construction on existing and proposed residents and the highway network a Construction Environmental Management Plan (CEMP) is proposed to mitigate noise from construction activities and this is proposed to contain;
- Construction activities should be confined to times of the day when they are least likely to be disturbing;
  - Careful selection of plant, construction methods and programming. Only plant conforming with relevant national or international standards, directives and recommendations on noise and vibration emissions should be used;
  - Construction plant should be located, as far as is reasonably practicable, away from adjacent occupied buildings or as close as

possible to noise barriers or site hoardings where these are located between the plant and the buildings;

- Static and semi-static plant/equipment (e.g. compressors and generators) should be fitted with suitable enclosures where practicable;
- Personnel will be instructed on best practice to reduce noise and vibration as part of their induction training and as required prior to specific work activities;
- When plant is not being used, it should be shut down and not left to idle;
- Methods of work and vehicular routes will be selected with regard to minimising noise and vibration impact; and
- Given the phasing of construction, certain areas of the Proposed Development will be occupied while construction is still underway in adjacent areas. Where possible, the occupancy of completed phases of construction should be planned in such a way that there is a buffer between occupied areas and areas where construction is being carried out.

6.208. This Construction Environmental Management Plan (CEMP) shall be specified in detail by condition and is an acceptable approach to securing mitigation against construction impacts.

#### *Contaminated Land*

6.209. The application includes a Phase II contaminated land intrusive investigation report which details a survey of the site including two specific areas where former land uses may adversely impact residential development. These include a historic Sewage Works, a Former Landfill Site known as The Swale and an active Quarry and Landfill area known as Waldringfield Quarry. Some petrol and diesel tanks have also previously been recorded as being present on site. A desk study for unexploded ordnance is also included but states that no mitigation measures are deemed necessary.

6.210. Localised 'hot spots' have been identified where; mercury, lead, arsenic, coal tar PAHs and benzo(a)pyrene concentrations exceed guidance levels. In addition, ground gases associated with the former landfill sites are venting at a rate which may adversely impact on the proposed development.

6.211. A remediation scheme is presented to delineate the areas of contamination and recommend works to safeguard the proposed development. This mentions the removal of any contaminated soils to facilitate placement of a capping layer; for front gardens and landscape areas this is proposed to consist of 300mm layer of clean fill and for rear gardens a 600mm layer of clean fill. The clean fill being GEG verified material. Plus a VOC membrane beneath all gas affected buildings. Levels of TPH's in areas of made ground also present a risk to underground plastic services and therefore all services should be suitably protected from degrading by either the removal of contaminated soil or the use of resistant pipework. This requirement

predominantly relates to the school and open space areas and less to residential areas.

- 6.212. Further investigation is recognised as being necessary particularly around the quarry buildings in the vicinity of the fuel tanks to delineate any further 'hotspots' of; hydrocarbon/PAH and asbestos contamination. Additional gas and groundwater monitoring is also being recommended and these will be secured by condition.
- 6.213. Overall it is considered that the site can accommodate development and the mix of uses proposed with remediation and mitigation measures to avoid health impacts from any existing contamination on the site.

#### *Air Quality*

- 6.214. The potential impacts of the proposed development on local air quality during both construction and operational phases have been assessed as part of the Environmental Statement. Air quality effects of this development could be;
- During the construction phase, suspended and re-suspended fugitive dust emissions from demolition / construction activities and vehicular emissions from construction traffic, including re-suspended dust from HGV movements; and
  - During the operational phase, vehicular emissions (primarily nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) from increased traffic movements associated with the development.
- 6.215. An air quality impact assessment has been undertaken to assess both construction and operational effects associated with the Proposed Development.
- 6.216. In relation to construction dust impacts, these are deemed to be negligible. Through good site practice and the implementation of suitable mitigation measures, the effect of dust and particulate matter releases may be effectively mitigated.
- 6.217. The impact of traffic generated by the proposal has been assessed based on predicted pollutant concentrations at 26 existing sensitive receptors including 20 residential properties, two schools, two short term receptors and two sensitive ecological habitats close to the roads affected by traffic generated by the development. Five locations within the application site were also included.
- 6.218. The emission factors released by Defra in July 2016, have been used to predict traffic related emissions in 2015 and 2027 in a model. Traffic emissions predicted by the model were added to local background concentrations.
- 6.219. The results of the modelling indicate that concentrations of relevant pollutants (NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>) will meet the relevant AQS objective levels at nearby sensitive receptors and within the site itself. The significance of the effects of the emissions arising from traffic of 2000 homes on

surrounding roads, particularly the A12 and Main Road, Kesgrave, associated with the development is considered to be negligible. The modelling of airborne NOx and nitrogen deposition rates at the relevant sensitive ecological habitats is considered to be insignificant.

- 6.220. Whilst the formal response from Environmental Protection on this matter is awaited, based on the latest Air Quality submission the submitted information is deemed adequate and no objection is expected. It is therefore considered that the proposed development would not adversely affect air quality in the area.

#### *Light Pollution*

- 6.221. The area surrounding the site to the south and east will be sensitive to increased light levels in on the site due to the rural character and its habitats. The application contains a 'Lighting Appraisal Report', which assesses the likely impact of lighting during the construction phase of the development and the operational impact to residential properties on the completion of the development. Light sources will include internal and external lighting of buildings and street lights. At present no flood lit sports areas are proposed. Street lights would be the greatest source of light emission and modern street lighting can now focus light and restrict it spreading upwards or sideward. It is also not necessary to have street lights on all streets and the streets on the edges of the development would not have street lights and this is shown on street sections in the Design and Access Statement.
- 6.222. The Landscape and Visual Impact Assessment also considers the night time impact of the development on the landscape, incorporating an assessment of wider lighting effects. In particular the view of the site facing east from the Area of Outstanding Natural Beauty has been assessed and a night time photomontage is included. The Arboricultural and Landscape Manager has considered this and states: *"Night time effects are reviewed but it must be accepted that at an outline stage these are not easy to fully assess. It is anticipated that they will be no worse than Minor adverse"*.
- 6.223. A list of mitigation measures have been identified to address light impacts in the construction period, including Specified working hours and the location of construction compounds; Lighting should to be switched off when not required and directed appropriately; The use of appropriate hoarding (if deemed necessary) can contain surface level illumination on the boundaries of the construction areas;
- 6.224. For the occupied development, a detailed lighting scheme will need to be submitted under a condition setting out all street lighting and external lighting of public areas. External lighting on residential properties is usually installed after occupation and should not be controlled by condition. However the layout of the development may reduce the need for external lighting, particularly of private parking areas through suitably orientated buildings onto parking areas illuminated by street lighting.

- 6.225. The amount and intensity of light emitted from this development can be appropriately controlled and minimised to avoid a significant impact on light pollution levels in the area. It is judged, through a variety of consultation responses, that there would be no adverse impact on the amenity of the area, the night time landscape or ecology and biodiversity to resist the development of the site in its proposed form.

## **CREATING A COMMUNITY**

- 6.226. This report deals extensively with the built form of the development and the infrastructure required to deliver a sustainable community. The NPPF is clear that there are three aspects of sustainable development: Environmental, Economic and Social. The later is influenced by the design of the development and the infrastructure incorporated and funded but it also transcends beyond the point of planning involvement into the occupation of the development and specifically in how a sustainable population may come together as a community.
- 6.227. A development of this scale will require early influence over the creation of a cohesive community and one which best demonstrates the sustainable principles around which it has been accepted. These include: successful implementation of the recreational use of the site as proposed within the SANG; the take up of the sustainable transport measures included within the Travel Plan; the development of a strategy of community ownership of the spaces and facilities; forming a healthy and happy community; and, the integration of the community with its surrounding communities and uses.
- 6.228. To some extent this would organically occur in any location with a large and connected population and it is expected that a new population will have shared interests and goals to achieve in their community and will come together to implement those. However, this site will be developed over a 15 year period and there may be some fragmentation of the community over that time and a delivery of community facilities at a different pace to the homes. Therefore a strategy needs to be developed to facilitate a sense of community from the earliest phases.
- 6.229. The first residents will be most isolated, both physically and socially and therefore additional input will be necessary to ensure that the early phases integrate with existing communities, particularly the nearest community at Martlesham Heath. This will require some intervention to connect walking and cycle routes and to establish social links with existing residents. The applicants have therefore provided Part 1 of a Community Cohesion Strategy in close collaboration with the Council.
- 6.230. A detailed Part 2 Community Cohesion Strategy will need to be submitted under a condition and by that time the applicants would have established a community based management body to take ownership, liability and responsibility for all community assets on the site. These include the SANG, playing fields, community centre, play and sports equipment and allotments. Talks have already taken place with The Lands Trust, a national charity



providing community ownership and management services who are already very experienced in delivering community management on this scale. However there are other similar charitable trusts that could be involved or an independent body could be set up to take on the role.

- 6.231. It is expected that such a body will act entirely in the community's interests and therefore all service charges on residents and income from the hire of facilities such as the community centre would be reinvested into the community for its enhancement and maintenance. As the community grows it is likely that the body would become more and more owned and run by its residents, reducing the need for external involvement.
- 6.232. Initially it is proposed that the Council should take a lead in establishing some cohesion between the development of the site and community and its surrounding communities. It is therefore proposed that a community liaison group be established to initially keep surrounding communities well informed of the progress with reserved matters and development. Initial membership would consist of officers, ward members, neighbouring Parish Councillors and representatives of the applicants/developers. This would then progress to become integrated with the first residents and the management body and its membership could gradually transfer to community ownership and leadership. This will enable some sense of community and public ownership of the development from an early stage and it will become the embryo of community based group. Such a group will encourage cohesion between the new and existing communities through events and awareness. It is also possible that the community would then be provided with the opportunity to guide proposals for the site, such as the final design of the community centre and the type of sports and play facility proposed.
- 6.233. This approach will also aid in ensuring a collaborative approach between the three Parish Council's covering the site. Some representations received have questioned whether the site should be its own separate Parish. This is not something for the planning application to establish but it is acknowledged that the completed site will have a substantial population and its own identity, despite being an extension of the urban area of Martlesham. It will be down to the appetite of future residents and existing Parishes as to whether there is any future boundary review to separate this site into its own Parish. There is no reason why it cannot be part of Martlesham, Waldringfield and Brightwell for now or in the long term and that diversity of Parishes will aid in establishing a community with both rural and urban characteristics.
- 6.234. It is important that new residents feel integrated and aware of the planning principles that have established their community and that they are guided to ensure that the development is occupied as sustainably as possible. This can be achieved through the provision of a welcome pack. This is a typical requirement of travel plans and in that case it will provide information on sustainable transport and movement from and around the site along with incentives such as bus vouchers and bicycle purchase discount vouchers. In this case officers are of the view that a more comprehensive welcome pack

should be developed, through a condition, to cover a wider range of influences. This would include information about recreational routes and facilities on the site delivered within the SANG, supporting its existence as mitigation. It would also provide a guide on walking and cycling routes outside of the site but influencing residents to travel in directions away from the sensitive estuary. It should also set out the services and facilities for the site and the phasing of those along with the principles of the community body.

- 6.235. A final area of community involvement is in respect of Public Art. This is a requirement of Policy DM25 which states that major developments should include the provision of publicly accessible works of art. The policy emphasises that where possible this should involve the local community as an enhancement facility to achieve a sense of place and identity. In some circumstances it is appropriate to deliver such art through a section 106 contribution, however in this case it is considered that the art should be delivered through and by the community as it grows. Therefore a condition is proposed to establish the amount of art through the site, the level of funding and a strategy for its delivery through the community group or management body. A wealth of opportunities and influences will exist through the SANG and Heritage Park areas and the on-site school and its pupils should be influential on the final proposals.

## **7. CONCLUSION**

- 7.1. The NPPF is very clear that a presumption in favour of sustainable development should apply to the consideration of housing applications. The NPPF, recent Housing White Paper and recent appeals are placing great responsibility upon local authorities and communities to take action to significantly boost housing growth. Indeed the Council has faced numerous challenges over the past five years in addressing its housing needs and unplanned development seeking to take advantage of that need. The delay in this plan-led site coming forward, partly due to legal challenges against it, has contributed to resisted un-planned developments across the District being allowed on appeal.
- 7.2. Policy SP20 (Eastern Ipswich Plan Area) of the Core Strategy is fundamental to the principle of development on this site and it establishes the direction of major strategic housing growth in the District and East Ipswich Plan Area (EIPA). That growth is in the form of a commitment to delivering up to 2000 homes on Land to the South and East of Adastral Park (the application site) which is also established by the housing distribution policy SP19. These policies are clear in respect of the location, amount of housing and the infrastructure necessary to deliver a sustainable plan-led development over the Core Strategy Plan period (2013-2027).
- 7.3. The Council has a five year housing land supply and the current five year housing land supply assessment includes housing coming forward on this

site. The proposal is considered to be deliverable and capable of commencement in 2018. The trajectory proposed in the application shows that the site would deliver up to 160 homes per year up to 2033. The maintenance of a five year housing land supply in the District is therefore heavily reliant upon delivery of homes through this application.

- 7.4. This report sets out a detailed consideration of the impacts, effects, benefits and mitigation resulting from the proposed development. The principle of this development is established in adopted policy SP20. That policy is compliant with the NPPF and it has been found sound. That was through the Core Strategy examination and that decision was subsequently upheld by the High Court and Court of Appeal, following an unsuccessful legal challenge. Furthermore the quantum of development and the progression of the site through a planning application (including a masterplan) has been accepted in the examination of the more recently adopted Site Allocations and Area Specific Policies Document. However, Policy SP20 recognises that the development of up to 2000 homes on this site is reliant upon compliance with the The Conservation of Habitats and Species Regulations (2017) which requires the applicants and Council to show that the proposed amount of development will not adversely impact on European Sites, specifically the nearby Deben Estuary SPA.
- 7.5. The proposal has been driven by the need to mitigate any potential impact from the earliest stages of conception and the overall masterplan is framed by the necessary on-site open space. That is in the form of the Suitable Alternative Natural Greenspace (SANG) which is proposed in a form which is both of a quantity and quality to perform as an alternative on-site recreational resource to avoid recreational impacts on the SPA. This proposal and the accompanying shadow Habitats Regulations Assessment and Environmental Statement have been assessed and accepted by the Statutory Advisor, Natural England, and the Council's own independent ecological consultant. The mitigation proposed, alongside a £300,000 contribution to the wider Recreational Avoidance Mitigation Strategy are deemed suitable to enable the Council to discharge its responsibility as the Competent Authority under the Regulations. The Council has undertaken its own Habitats Regulation Assessment which it has consulted upon. The Council considers that there would be no likely adverse effect on the SPA, so that no Appropriate Assessment is required. However, even had any different conclusion been reached as to the need for an Appropriate Assessment, the Council also considers that the same information means that under an Appropriate Assessment of the proposal, it is satisfied there would not be any adverse impact on European Sites.
- 7.6. The second fundamental influence on the delivery of up to 2000 homes on this site is the effect of traffic resulting from the development on the highway network. An extensive process of engagement with the Highway Authority and Highways England has taken place and a detailed traffic model has been produced and validated by the Highway Authority in a collaborative process using data from both the Highway Authority and the applicants' consultants. All mitigation proposed has been reviewed in detail

and all proposed junction improvements and accesses have been subject to independent Road Safety Audits, showing positive results. The proposal will substantially increase traffic on the local highway network and the mitigation proposed will go some way in minimising its effect when compared with the two reference cases (in 10 years time without the development and with the development but without mitigation). The results show that the development would not result in severe impacts on the highway network, which is the requirement of the NPPF. The substantial £15 million investment in the highway network could only be delivered through a single major site and should be recognised as a benefit of the development.

- 7.7. The location of development will affect the setting of designated heritage assets in the form of three prehistoric bowl barrows, which are Scheduled Monuments. Any development on this site will affect the setting of these and the applicants propose to mitigate the impact through: the provision of open space around them; physical improvement to the Scheduled Monuments; their maintenance; and, the provision of public access and interpretation. Some of this mitigation in itself can be considered as beneficial to the heritage assets and worthy of weight. The statutory consultee in respect of Scheduled Monuments is Historic England who has objected to the application, predominantly on the basis of the less than substantial harm to the setting of the western barrow through the scale, density and proximity of its proposed urban surroundings. This harm and Historic England's opinion has been given great weight when applying the required balance under paragraph 134 of the NPPF. It has been judged that the public benefits of this otherwise policy compliant development are exceptional enough to outweigh the less than substantial harm caused to heritage assets.
- 7.8. The development will also introduce some effects on the landscape, biodiversity and on-site ecology. These are all being addressed through mitigation, including extensive planting, landscaping and habitat creation. Any impacts are not considered to be such that they would outweigh the benefits of this development in isolation or in combination with other impacts. The Environmental Statement accompanying the application sets this out.
- 7.9. In terms of the benefits, the contribution of up to 2000 homes to the District and National housing needs cannot be underestimated as a substantial benefit. That would include up to 500 affordable homes in an area of concentrated affordable need. Despite the lesser proportion being achieved, the mix of tenures would cover a broad range of local affordable housing needs and the units would be of a generous uplifted unit size. This would be a significant social benefit. The development will also provide land and the majority of funding for an all through school to address the education needs of the development site. It would also enable the County Council to address an existing shortfall of school places in the area. This is the only known site in the East Ipswich Plan Area which could deliver a secondary school and that is a major benefit of this plan-led site. The community infrastructure and open spaces are expected of a development of this scale and serve

purposes as mitigation, but overall they will provide a significant community and environmental benefit, particularly in their contribution to the area when set against the current quarry use of the site.

- 7.10. In economic terms, the site will contribute extensively to the local economy of the area both directly and indirectly. The infrastructure works, site preparation and section 106 contributions amount to over £96m of infrastructure investment including £10m for land preparation and stabilisation, £40m of section 106 contributions and over £15m of highway network improvements. This investment will contribute extensively to the local economy and a wide range of local businesses and suppliers will benefit from this growth over the next 10-15 years. The Socio-economic chapter of the ES has calculated the creation of 250 full time direct construction jobs and a further 302 indirect jobs over the construction period. The completed development could deliver a further estimated 350 jobs in the combined employment space adjacent to Brightwell Barns, the school and retail outlets, open space management and community facilities. The development will also deliver a new road through Adastral Park, facilitating a future redevelopment of that area. That has the potential to create hundreds of new permanent jobs.
- 7.11. The development would create some indirect income to the Council. Local financial considerations may or may not be a material planning consideration and consist of grants or other financial assistance that could be provided to a relevant authority by a Minister of the Crown. This includes New Homes Bonus (NHB) payments, or sums that a relevant authority could receive, in payment of the Community Infrastructure Levy (CIL). The development is not liable for CIL (except for the retail proposed) and Council Tax receipts may be acknowledged as an income from the site but not as a material consideration. NHB should be received from the development and this will make a substantial contribution to spending across the District from the NHB receipt. The Council will consider annually how it plans to allocate the NHB receipt and due to the significant contribution this site may make then it may be possible to allocate some of that directly into the local area for infrastructure and community benefits. Therefore, at present, a modest amount of weight may be applied to this as a benefit.
- 7.12. The site will also provide financial mitigation in the form of contributions to Primary Healthcare, the recreational avoidance mitigation strategy for wardens in the Deben Estuary, Rights of Way improvements and bus service improvements. Whilst these are proportionate contributions to mitigate the development's impact it is considered that there will be residual benefits resulting from this investment and that should be seen as a moderate benefit.
- 7.13. Overall, this plan-led site, which is specifically excluded from CIL charging to enable the complete delivery of infrastructure on and off site, enables a highly sustainable form of strategic housing growth. It will make an exceptionally large contribution to the housing need of the area over the next 10-15 years and the economic investment and jobs created will be substantial benefits. In addition, the site provides a high quality opportunity to deliver a sustainable and well integrated community, incorporating a wide range of on-site services

and facilities which would not only benefit its future residents but also the existing surrounding community. The substantial green infrastructure proposals and commitment to high quality urban design and architecture has the benefit of promoting this site as an exceptional and innovative solution to housing growth within a sensitive context. That will be beneficial to the area as a whole and to public confidence in the planning system, particularly in contrast to speculative unplanned developments that would be the alternative.

- 7.14. The highways impacts will be less than severe and the mitigation proposed the highway network has the ability to accommodate this development and add some betterment. The application has no objection from the Highway Authority and they recommend that the application should not be refused on highways grounds. The location, sustainable connections proposed and the commitment to a community focussed travel plan will also enable an exemplary form of sustainable housing growth which would be very well related to the existing and proposed employment areas. The proposal has methodically set out to address its impacts on the sensitive local environment and landscape and it incorporates suitable mitigation to discharge legislative and policy requirements.
- 7.15. It is recognised that this application has generated local objection through 102 letters and emails from nearby residents and objection and concern from Parish and Town Councils. These are acknowledged and addressed in the consideration within this report. It is respected that a development of this scale and its increase in the local population will have a notable effect on the local area, particularly during the construction period. However, relatively short term construction impacts will be minimised through a detailed construction management plan and the previously considered mitigation will address longer term effects of development. Whilst it may not be agreed by all, the proposal represents a benefit to the wider local community, particularly in terms of the current housing and education needs and those of future generations. The proposal will also protect and preserve the surrounding sensitive landscape and the separate rural nature of nearby communities and villages. The Council and its officers are dedicated to ensuring that the detailed application stages incorporate the existing local community in order for them to shape the proposed community.
- 7.16. This proposal accords with the Development Plan and it represents plan-led and infrastructure-led development which achieves compliance with the economic, social and environmental roles of Sustainable Development. Whilst this is a policy compliant development, it is important to consider the effect of paragraph 14 of the NPPF on the determination of the application. Due to its policy compliance, it would accord with that paragraph's requirement to approve development without delay. This paragraph is also dependent upon how up-to-date the District's housing requirement policy is. Policy SP2 (Housing Numbers and Distribution) of the Core Strategy is deemed to be out-of-date. This requires the Council to apply the fourth bullet point of paragraph 14, this is known as the 'tilted-balance'. The tilted balance will apply only if members are satisfied that the harm to the setting

of the heritage assets as identified above is outweighed by the public benefits of the proposal in accordance with NPPF paragraph 134. If this is the case, the requirement is to permit applications for sustainable development unless any adverse impacts of doing so (and this will include the harm to the setting of the heritage assets) would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or specific policies of the NPPF indicate development should be restricted. Based on the assessments already undertaken, it is considered that the adverse impacts of the proposed development do not significantly and demonstrably outweigh the benefits. The application should therefore be approved.

## **RECOMMENDATION:**

### **AUTHORITY TO APPROVE** subject to:

- 1) The final response of no objection from Highways England being received and the mitigation proposed for Junction 58 of the A14 (Seven Hills Roundabout) being acceptable. If not confirmed prior to the Planning Committee Meeting this will be confirmed prior to approval with the Chair and Vice Chair of the Planning Committee.
- 2) Signing of a Section 106 agreement to secure the following planning obligations, with final contribution amounts to be agreed:

#### Affordable Housing

- 25% of the residential units shall be delivered as affordable housing
- The target tenure mix shall be 25% affordable rent, 25% intermediate rent, 25% shared ownership and 25% shared equity units
- The shared equity units shall not be sold other than at a price no more than 75% of the open market value
- The affordable housing units shall be no less than the following size (gross internal area): 1-bed flat (50.5 sqm); 2-bed flat (68.1 sqm); 2-bed house (74.8 sqm); 3-bed house (91.2 sqm) and 4-bed house (105.5 sqm)

#### Travel Plans

- No residential unit within any phase shall be occupied until the travel plan in respect of that phase has been approved by the Council
- Each phase of the development shall be carried out in accordance with the relevant approved travel plan

#### Highways Contributions including,

- Speed limit TRO funding
- Funding for works to non A12 junctions
- Funding of improvements to the wider network
- Contributions shall be made towards the enhancement of public transport

#### Education and Libraries

- Contributions towards pre-school, primary education, secondary education, temporary classrooms and primary school transport
- The school land (being no less than 5.5 hectares) shall be transferred to the County Council (in serviced condition)
- Agreement to shared use of formal recreational open space.
- Funding of library facilities within the Community Centre.

#### Health Centre

- To pay a contribution to the Council to enable expansion of existing local primary healthcare facilities

or

- To provide a health centre on the site to specification agreed by NHS England

#### Sports Pitches

- Sports pitches (7.9 hectares) shall be provided on the site in accordance with a specification agreed by the Council.

#### SANG Land

- 21.5 hectares of suitable alternative natural green space shall be provided on the site to include 3.3 hectares of land comprising local landscaped areas of play/trim trails and 0.6 hectares of the heritage park
- 1.5 hectares of land shall be provided as a heritage park in accordance with a specification agreed by the Council
- 5 local landscaped areas of play, large trim trails and small trim trails shall be provided in accordance with a specification agreed by the Council

#### Recreational Avoidance Mitigation Strategy (RAMS)

- Contribution of £300,000 to the Council towards the Recreational Avoidance Mitigation Strategy for wardens and mitigation in the Deben Estuary.

#### Allotments/Community Orchard

- 0.83 hectares of allotments/community orchard land shall be provided on the site in accordance with a specification agreed by the Council

#### Public Rights of Way

- Various works to and contributions to create, upgrade and improve on and off site public rights of way to be provided

#### Community Infrastructure

- To provide a community facility in the local centre (which is capable of accommodating (amongst other things) office space for the constabulary) in accordance with a specification approved by the Council. Minimum of 500 sqm.
- To provide a sports pavilion (to include changing facilities) in accordance with a specification agreed by the Council. Minimum of 200 sqm.
- Minimal requirements in respect of the above will be set out in the Agreement



- A management company shall be established to manage and maintain the allotment/community orchard, the SANG land, the sports pitches and the community facilities
- Early funding contribution to the Community Strategy
- Public art fund for community implementation
- Suffolk Constabulary PCSO funding

3) The following summarised conditions:

- Time limit for commencement of development and submission of reserved matters applications for each phase
- Reserved matters of Layout, Scale, Appearance and Landscaping to be submitted.
- Detailed phasing strategy to be submitted
- Maximum floor area of A1, A2, A3, A4, A5 uses not to exceed 2,500 sqm.
- Approval of access drawings
- Approval of sections of the DAS
- Approval of Heritage Park Plan design principles
- Details of downgrading of road leading to Western Ipswich Road access.
- Details of materials to be submitted with each reserved matters application for appearance
- Details of means of enclosure to be submitted with each reserved matters application for landscaping
- Details for bin and cycle storage facilities to be submitted with each reserved matters application for layout
- Submission and implementation of a Community Cohesion Plan in accordance with the Community Cohesion Strategy.
- Submission, agreement and provision of new residents welcome pack.
- Public Art strategy to be agreed and implemented
- Environmental Action Plan and ecology conditions
- Submission of development platform levels with each reserved matters application for layout.
- Submission of proposed finished floor levels prior to commencement of development for each reserved matters area.
- Highways conditions, including off site junction improvements (through a s.278 process)
- Scheduled Monuments– Agreement of restoration, management and interpretation
- WWII non-designated heritage assets – Agreement of restoration, management and interpretation
- Archaeological conditions
- Recording and deposition of historic records on the Historic Environment Record

- Surface Water drainage details and implementation as requested by the SCC and the Environment Agency
- Foul drainage strategy as requested by Anglian Water
- Scheme for installation of fire hydrants across the site
- Land contamination conditions requested by Environmental Protection and the Environment Agency
- Identification and removal of invasive species
- Construction management plan
- Details of acoustic bunds/fences, implementation and maintenance
- Details of windows, ventilation and noise attenuation to road noise affected properties on western edge of site
- Submission of a lighting scheme alongside each reserved matters application for layout.
- Removal of permitted development rights for the change of use of shops and offices to residential.
- On site public right of way condition(s)
- Provision of facilities for charging, plug in and other ultra-low emission vehicles in public parking areas of the Primary Local Centre and Business area.
- Tree protection measures to be submitted with each reserved matters application where they differ from submitted.
- Submission of a Sports Facilities Strategy as required by Sports England.
- A location for public recycling facilities to be agreed and implemented
- Agreement of details of Part M4(2) and Part M4(3) of the Building Regulation in each strategic phase (5% maximum for each)
- Removal of permitted development rights for the creation of hard standings and enclosures on front gardens facing onto the SANG and Heritage Park

**DETERMINATION:**

**BACKGROUND PAPERS:** Planning Application File Ref No. DC/17/1435/OUT, C/09/0555 (withdrawn), C/08/1725 (withdrawn)

**Committee Date:** Monday 15<sup>th</sup> January 2018

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## 8. **REPORT APPENDICES**

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**Principal Design and Conservation Officer – Consultation Response**

### **Appendix 2.** Page 180

**Suffolk County Council Planning Obligations Manager - Consultation Response**

### **Appendix 3.** Page 193

**Suffolk County Council Highway Authority –Final Response**

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**Suffolk County Council Highway Authority – October Response**

### **Appendix 5.**

**Martlesham Parish Council Consultation Responses**

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### **Appendix 6.**

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### **Appendix 7.** Page 295

**Kesgrave Town Council – December Consultation response**

**Appendix 1.**  
**Principal Design and Conservation Officer – Consultation Response**

# Memorandum

**To:** Ben Woolnough **cc:**  
**Your Ref:** DC/17/1435/OUT  
**From:** Robert Scrimgeour  
**Our Ref:**  
**Date:** 18<sup>th</sup> August 2017

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**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.**

Ben – you have asked me to comment on the above outline application to construct up to 2000 homes, provide an employment area, primary and local centres, a school, green infrastructure, public footpaths, vehicle accesses and associated infrastructure including a new junction on the A12 at land south and east of Adastral Park at Martlesham Heath in Martlesham.

## **1.0 Background**

As you know, I was involved with the original pre-application and application, albeit intermittently, shortly after my arrival at SCDC in 2007 as Senior Design and Conservation Officer (and still completing my postgraduate Urban Design qualification). That application (C/09/0555) was under the design direction of David Lock Associates. My involvement extended until 27<sup>th</sup> January 2010 and up to that time had included meetings with DLA, internal officer meetings, a site visit, a public exhibition and also a trip to London for a CABE (as was) design review. My involvement ceased after that date due to the legal challenges that were taking place which effectively halted determination of the application (now withdrawn).

On the basis of the extent of my prior involvement with the development of this site, therefore, it is fair to say that I have a reasonable knowledge of the site and a broad understanding of the development issues arising in which I take a direct interest here, namely urban design and the conservation of heritage assets.

In respect of the current application, I was involved with you at your request at pre-application stage, which involvement included 6 meetings with the design team and one post-submission. One of the pre-application meetings included the applicant's heritage consultants (Montagu Evans), Historic England and County Archaeology. Present at these meetings were the applicant, the applicant's planning agent and the masterplanner (Broadway Malyan). You and I also took the opportunity to visit the site together at pre-application stage and to visit development sites in the vicinity that were of interest including Mill Heath, Martlesham Heath and Ravenswood. We also met the Council officer team behind the proposed garden suburb extensions to Maldon in Essex for the same developer and masterplanner. That meeting was particularly useful in gaining an appreciation of the depth and detail applied to the control of future development in a phased basis on a site in more than one ownership via embedded design coding, albeit that this was not readily transferable as an approach due to time constraints and a differing design philosophy.

As you know, I am a chartered architect, chartered town planner and have a postgraduate qualification in urban design alongside another qualification in landscape history and field archaeology. It is with this knowledge and many years experience that I shall provide you with broad comments on the current outline application in relation to matters of urban design, principally. I shall also provide some comment on heritage matters but you are aware that the only designated heritage assets that are directly affected by the proposal are Scheduled Monuments, the remit for which is held by Historic England and about which you have now received comment (twice).

## **2.0 The Application**

The application documents which I have taken into account in my comments to you are the following:

- Planning Statement
- Design and Access Statement (with additional submitted pages)
- Site Features Plan
- Illustrated Masterplan Framework
- Heritage Park (updated)
- Character Banding Plan (updated)
- Land Use Plan
- Strategic Landscape Scheme (updated and expanded)
- Lighting Statement
- Environmental Statement, Volume 1, Chapter 7 – Archaeology and Built Heritage (plus covering letter)
- Environmental Statement, Volume 2, Chapter 11 – Landscape and Visual Impact
- Environmental Statement, Volume 2a Appendices – Appendix D2 Heritage Receptor Map; Appendix D3 Map regression; Appendix D4 Heritage Statement; Appendix D5 Statutory Descriptions for Designated Heritage Assets
- Environment Statement, Volume 2b Appendices – Appendix I Noise Appraisal
- Parameter Plans
- Covering letter to you of 19<sup>th</sup> June 2017 from CODE Development Planners Ltd
- 3 x CGIs: Gateway CGI; Valley Edge CGI; Local Centre CGI

In making my comments to you on matters of urban design I have used my working familiarity with *By Design*, the *Urban Design Compendium*, the *Manual for Streets 2* and the 3<sup>rd</sup> edition of *Building for Life 12* (produced by the Design Council). *By Design* is, for me, still the best and was the first government guidance on design in the planning system since 1953. It was published in 2000 and withdrawn in 2014, although its precepts and principles are still applicable, in my view. On withdrawal, the government took the view that it did not intend to publish replacement guidance but that others could and in May of this year the RIBA published *The Design Companion for Planning and Placemaking*, of which we now have a copy in our office library. I can confirm that it will also be available for our use once we receive subsequent reserved matters applications for the detailed design and layout of the site. Also of relevance, of course, is section 7 of the NPPF, *Requiring good design*, and the supporting paragraphs of the NPPG.

## **3.0 Analysis**

I shall refrain from undertaking a description of the site, its current extraction and agricultural uses and its context as this is provided acceptably within the Design and Access Statement (DAS) and also your site visit committee report of 30<sup>th</sup> May 2017. The site is well positioned adjacent a major A-class road, adjacent employment uses and close to existing residential, retail and commercial areas. As such, development here will, by virtue of its position, relate well to the existing built up area and

urban character in and around Martlesham Heath. The site also has sensitive landscape edges to its north, east - in close proximity to the AONB –and to the south.

In urban design terms, the site has constraints which will affect its masterplanning and layout:

- There are no built up residential areas that abut the site into which development can directly connect and relate to
- Due to the site's existing and historic industrial activity, there are very few pre-existing site features or significant topography (other than man-made) that can be utilised to positively influence layout design. Features of note only include the Scheduled Monuments, military heritage assets, footpaths and lake.
- The A12 adjoining the western edge of the site presents good connectivity but also a potential visual and acoustic barrier
- The site is visually dominated, in part, by Pegasus Tower and the adjoining multi-storey block (the Orion building). These are landmark buildings in scale, design and use.
- The countryside edges to the east and south will mark an abrupt transition in character to the landscape beyond –of defined quality - that will require sensitive design
- The residential element of the wider urban context for this site is varied and of variable quality such that it is difficult to draw upon elements of local character and its identity to assist in the creation of a sense of place

From these constraints, however, opportunities will arise and for any design to be successful, these should be taken into account and creatively utilised. In my view, these include:

- Using high quality building and urban design to create the site's own identity or series of identities such that its local distinctiveness will arise out of being distinctive locally
- Exploiting the few existing site features to generate positively characterised nodes, landmarks or key spaces
- Acknowledging and celebrating the remarkable architectural landmark that is Pegasus Tower and its attendant complex of buildings. The scale disjuncture between the Tower and what will become surrounding residential development can have the power to dynamise views, layout and urbanism.
- Utilising the A12 as the opportunity to provide a commanding built edge to the site, signalling its presence, its attractive and inspiring character and engaging with this important and dynamic thoroughfare in a way that the Martlesham Heath development wholly fails to do
- Respecting and acknowledging in a refined, careful and considerate way the countryside edges to this site and, for that matter, within the site along Spratt's Plantation and which will become the SANG.

Whilst not a comprehensive list of site opportunities, I suggest that these can form a useful test for the current and future proposals. On this basis, I have the following broad comments on the proposals for development at this site:

### **3.1 Routes**

- a. The principal organising element of the layout as illustrated is the primary road that joins the site to the A12 and which forms a linear spine penetrating the depth of the site and providing access to proposed residential blocks either side. This route, in effect, terminates at the primary local centre which will consist of a mix of uses concentrated in the heart of the development. Also connecting to this centre is a primary road that accesses the development through the industrial estate to the north of Adastral Park. Although this

primary road is continuous through the development, as laid out, I prefer to see it as two principal routes that lead directly to its centre. In this way, the centre is emphasised as a destination and place of importance and from which a lot of the site's functional needs will be met in terms of education, community uses and retail. This importance will need to be reflected in its detailed design to ensure that this centre will be attractive, vibrant, well-used and thereby successful.

- b. As such, therefore, the position of the linear spine route and its connection between the A12 and primary local centre is highly effective in the spatial organisation of this layout. Its linear form also allows it to connect and therefore provide access to most of the key features within this site: abutting residential blocks; secondary access routes and access points; the main green infrastructure; and the secondary local centre. In this way, the route serves multiple purposes through its connectivity and, as importantly, will enjoy a varied spatial experience for users (drivers, cyclists, pedestrians) and avoid becoming a monotonous residential boulevard.
- c. What the linear spine route does not do, of course, is connect directly to the landscape edges of the site and this is appropriate. Primary access to development should always be directed towards principal roads that have sufficient designed carrying capacity. In the layout shown here, secondary traffic that would be strictly local in nature and usage would be filtered to connect to Ipswich Road, running along the south edge of the site. This layout should ensure a reasonable (but limited) degree of vehicular connectivity but which recognises the constraints of the existing road layout and hierarchy.
- d. In respect of the overall hierarchy of routes within the proposed layout beyond the boulevard and southern access roads, I understand that this is indicative only with respect to vehicles and will not be included within any permission, if granted. However, the suggested layout does illustrate a desirable degree of permeability and connectivity within the site such that key spaces – the heritage park, primary and secondary local centres, the SANG, and green edges are readily accessible. The pattern of urban blocks arising may well alter subject to individual developer interest but it is important that the route hierarchy and structure illustrated can be seen, informally, as a benchmark. Of importance, but not illustrated, will be the interface between the urban blocks and the SANG and its offshoots at Spratts Plantation and the valley to the south, and also the heritage park. It is obviously desirable that, where these spaces abut residential areas, dwellings will front these spaces but this need not preclude the use of a tertiary access forming a shared space to these frontages, an example of which we saw successfully at Mill Heath.
- e. The movement and access parameter plan underplays, of necessity, the likely degree of permeability within the site when development comes forward. It will be essential to ensure that in those areas where the primacy of the pedestrian is illustrated on the plan – the heritage park, connecting green corridor, SANG, Spratt's Plantation – this is retained. It will also be critical to ensure that those parts of the site most remote from the primary local centre – the northern edge and south-eastern corner – are well connected to it via accessible and alternative routes.
- f. The parameter plan very usefully illustrates the extent of pedestrian access points to the site that will connect it into the extensive network of footpaths and rights of way leading into the surrounding landscape. This demonstrates that for footpath users, at least, there will be very good connectivity from the site into its immediate context – including in the north-western corner which will provide access to local employment and retail facilities. The secure boundary to the BT site, in contrast, is a significant barrier, unfortunately, that will form a dead edge along its substantial extent. For the present, nothing can be achieved about this.
- g. I particularly welcome the opportunity, as shown, to make an important pedestrian and cyclist connection in the top western corner leading to Barrack Square and beyond. It is



encouraging to note the inclusion of a technical design (by Brookbanks) that illustrates the feasibility of this connection. This has the potential to become a well trafficked route for cyclists and pedestrians, providing good connectivity into the local footpath network and national cycle network and providing connections to local retail and employment facilities and Martlesham Heath beyond. It is also appropriate that a close link is formed between the interpretation of the proposed heritage park and the former RFC/RAF buildings and memorial on Barrack Square, as this will aid understanding of the area's significant military history. I would also welcome the opportunity for public realm improvements to improve the off-site area to the north-west corner of the site just beyond the heritage park. This is a sensitive edge and provides an opportunity to enhance and improve connectivity and the quality of the existing space into which adjacent blocks will gain views (currently a soakaway). The important interface with the footpath/cycling connections here out of the site and the acoustic protection along the A12 will need careful consideration.

- h. The proposed primary road through the northern quadrant currently looks both indirect and somewhat unlikely in its current cranked form, although I appreciate that this is due to the constraints of existing buildings in use. For this route to eventually become attractive for users (pedestrians and not just drivers) and well-used it will be important that the re-development of this employment area is masterplanned to ensure a high standard of building design and environs.

### **3.2 Spaces**

- a. Of high significance and great merit in this layout is the extent and varied character of open green space that will be provided for the benefit of residents. The Main Green Infrastructure Area (also known as the SANG) will provide valuable recreational and wildlife space and lead to the re-greening of this part of the former industrial site. I have no remit to comment on its actual design or content but its position as a central wedge and its elongated form should ensure that a significant amount of residential development will benefit directly from edging this space, which is a desirable attribute of the layout. Such outlook will enhance residential quality and overlooking will provide a welcome element of security. Further, the co-location of the primary service centre and the existing lake within the proposed SANG will emphasise the mutual importance of both facilities.
- b. Of equal importance in terms of open space are the playing fields to the proposed school and formal recreational open space. Again, their extent and position will allow a substantial extent of residential development to overlook and enjoy these spaces and these will also form a significantly scaled open space that will appear as a continuation of the open landscape abutting the site in this area to the south. This is an attractive idea also in so far as it affords a significant transition space between the AONB when exiting it along Ipswich Road and that part of the development that forms a built edge westwards along the same route. It is vital, therefore, that these playing fields retain their general extent, position and configuration in any detailed design of the school facility.
- c. Of similar importance as open spaces are the green edges to the site. Again, these form vital transition spaces into pre-existing uses immediately beyond the site – farmland, light industry, traffic routes, caravan park, tree-ed copses. It is unfortunate that the site is unable to join hands so that it forms a true connection into any of these existing edge uses. The degree of physical and visual containment at this site is high (unavoidable in the case of the BT boundary) but is partly offset, at least, by the good degree of connectivity through and beyond the site created for footpath users – a key benefit not to be overlooked.
- d. Other proposed spaces are suggested to have useful uses such as allotments, a community orchard and a trim trail. This multiplicity of accessible uses should ensure a diversity of opportunity to use the entire development site in a way that is valuable to residents and can only be a benefit.

- e. Of particular note, of course, is the creation of the heritage park which I discuss, below, in greater detail.

### **3.3 Edges**

- a. When considering development proposals it is always important to consider how the designed layout will meet the edges of the site. It is important to understand that the edges have been taken into account by the layout and not ignored. Any design in this area is conditional, therefore, on the character of the existing edges. Given the scale of the development site here it is unsurprising that so many edge conditions exist: major A-class road/acoustic bund; landmark commercial buildings and secure compound; industrial estate; open farmland; open countryside; caravan park; domestic garden; other agricultural uses. Some of these it will be important for the layout to be a good neighbour to eg. domestic gardens, the caravan park. Others it will want to exploit and visually connect to: the surrounding landscape, which is of high value. Some it may need to turn its back to eg. the secure compound to the BT estate, albeit that it has some attractive green space of its own. And some it should 'confront' and directly engage with in a positive and confident manner eg. the A12 edge and the landmark BT buildings.
- b. Having raised the importance of edge treatment as we did at pre-application stage it is unsurprising that this has come through, largely, as a strength of the designed layout. This conceptual approach is illustrated in the character banding plan that forms part of the submission and in which key parts of the site's edges (amongst others) are emphasised for their potential character-defining and place-making conditions. Perhaps, I would have included the A12 frontage as an important edge that will have a defined character quite distinct from the rest of the development. I judge this plan to be of significant importance as it highlights those sensitive parts of the development where the accompanying detailed aspirations that are included in the DAS provide clear guidance for future developers in the nature of the design sought; whereas for other areas of development behind these edges and within an urban block or several blocks, designers will enjoy a free and creative hand in achieving place-making to meet the aspirations of individual developers. I do think that this is an important point to emphasise as we consciously have avoided the dead hand of design coding across the entirety of the site, in agreement with the applicant. We want to encourage and achieve a diversity of design and approaches that will, themselves, engender character areas within the development and I believe that the character banding approach – although novel – may well strike a good balance between freedom and prescription.
- c. This concept of edge treatment has been taken further with this proposal, to also consider important edges within the site, namely those along the principal spine road (or 'Boulevard') and those along the SANG. Where these edges abut or overlap are considered to be areas of special design consideration, albeit lacking in any detail at this outline stage. Thus, where the eastern edge of the SANG meets the edges of the Boulevard is positioned the lake feature, public open space and the start of the primary local centre. The power of the logic of this kind of masterplanning is self-evident and must also be applied elsewhere in the design such as: where the boulevard meets the A12 frontage; where the boulevard crosses the SANG edge; where the valley corridor edges meet the Ipswich road edge.

### **3.4 Potential character areas**

- a. Of note is that this proposal does not define character areas or parts of the site which must be designed in a particular way to enjoy a particular character. This is partly because there is no proposal here to impose an over-arching design concept to achieve a degree of unity or coherence, for example, calling this a 'village' or a 'garden suburb', both epithets which would be misleading here, in any case (and in most cases where they are applied, in my view). This proposal forms an urban extension to the built up area of Martlesham centred on

the significant employment, retail and commercial uses of Adastral Park and the adjoining industrial and retail parks. This is the only honest way in which to describe a development of this scale and offering the level of infrastructure provision as here. It will share certain characteristics with nearby areas such as Martlesham Heath and Grange Farm through its high degree of self-containment (which may well please some in the surrounding older villages) and lack of integration along its edges. Martlesham Heath is a powerful diagram of town planning in the 1970s with its concept of villages and village greens linked by a giant loop road. This diagram contributes to a strong sense of place when visiting today but also a demonstration of several aspects of urban design that we would no longer employ.

- b. My own view of the current site is that its extended cranked form, the central east-west position of the spine road, the north-south position of the SANG and the lake, the position of the access points and the phasing proposal will all lend themselves to a natural delineation of different areas of development and, therefore, character. I do not believe that 'character areas' will need any further elaboration or definition but will be created within these bounds and by differing developers coming forward with their own ideas and approaches. I see no need nor desire for an imposed coherent design ethos across this site; I would value the variety and interest arising from differing approaches in different parts of the site and suggest that we should not be afraid of that but welcome it. After all, the development area shown as 'Phase 2' at the front of the site next the A12 will have a markedly different character to that of Phase 3 abutting the AONB by dint of position and edge characteristics alone. The only risk with this liberal approach is that there will be far fewer character areas if there are very few developers for this site i.e. most development is undertaken by 2 or 3 developers only.

### **3.5 Density and building heights**

- a. I understand that the parameter plans that illustrate density and building heights are indicative only and represent the maxima, in which case the actual design densities and heights may be less but no more. This provides an indication of how the pattern of development is proposed across the site, albeit that this approach lacks a degree of refinement in my view. There is an interesting correlation between the character banding plan and these parameter plans, and the design principles that they appear to follow are to provide a higher density of development close to the A12 and along the boulevard, with low density development to the site's green edges to the north, east and south. The rest of the development is proposed for medium density, including to the eastern edge of the SANG.
- b. These densities correlate to maximum building heights – up to 3 and 4 storeys in high density areas; up to 2.5 storeys in medium density areas; and up to 2 storeys in low density areas. Density, of course, is not just about storey heights but also the proportion of built form to space around it. It may well be entirely appropriate for densities to be at the top end of the parameter plan maxima across the A12 frontage and along the boulevard where it traverses an urban-only context. Conversely, it may be more appropriate than is shown here for the countryside edge along Ipswich Road to be of a wholly lower density to avoid any impression of a solid built edge and harsh transition to the countryside beyond.
- c. I accept that the delineations between densities shown on the parameter plan will not be apparent on the ground and that the effect of changes in density will be achieved in a transitional way. I do, however, question the extent of high density shown to the western area of the site behind the A12 entrance. It does not appear to me entirely obvious why this area should be the exclusive focus for extensive high density development when one would expect the focus of that to be the primary local centre. Indeed, this centre is partly edged by extensive green open space – quite the opposite of high density when, in reality, the centre should be serving, in this area of the site, the most people able to access these facilities, ideally on foot. Thus, in my view, it is the primary local centre that should be the focus of

high density development at the heart of the site. I assume that the proposal here seeks to establish a wholly urban character as soon as one enters the site from the A12 and that, as this part of the site is more readily read as part of the urban context established by Adastral Park and the northern quadrant, there is a justification for the density proposed (albeit that this area of the site falls into the zone most affected by noise levels above 55 dB). If so, I can support this argument but also suggest that the location of higher density in the heart of the site needs to be reconsidered.

- d. Otherwise, I judge that these parameter plans set broadly acceptable design guidelines for densities and building heights. The only other areas of question are the eastern edge of the SANG which, because of the scale of this large open space, could tolerate being edged by medium density development of up to 2.5 storeys in height; and the density and height maxima around the proposed heritage park, which has been questioned by Historic England in terms of the setting of the Scheduled Monument, about which I shall comment further, below, on the heritage park.
- e. I note from the submission that the scheme has the potential to deliver up to 1 in 3 affordable dwellings but that their proposed mix is not yet fixed. The provision could consist of over 40% 1-bedroom flats and over 30% 2-bedroom flats and/or houses. This could potentially result in a significant number of apartments across the site and the mix of houses and apartments will need to be carefully considered in terms of building typology, density and position. I would anticipate a concentration of affordable and open-market flats around the local centres, for example.

### **3.6 Legibility**

- a. Legibility is the concept that a layout provides for recognisable routes, intersections and landmarks to help people find their way around. People intuitively navigate their familiar urban spaces through established uses, recognisable buildings or intriguing vistas. Places of anonymous character and bewildering route-finding alienate residents and visitors, and urban design has come a long way since the 1980s to understand the perceptual journeys that we traverse and then translate them into legible layouts. A broad masterplan such as the outline under consideration can describe only the large-scale gestures that will provide for a legible layout but it is important to determine if due consideration has been given to this area of design.
- b. The major setpiece spaces and principal uses will contribute importantly to the legibility of the layout shown here; namely, the A12 entrance; the SANG and lake; the primary local centre (including school); and the playing fields. I call these set-piece spaces because of their unusual scale. Within the matrix of urban blocks to the west of the SANG and valley are a primary road leading to a vehicle access point; a secondary local centre; a heritage park; a green corridor; and a visual axis to Pegasus Tower. I suggest that at the next scale of local legibility, this area of the development is well catered for in respect of routes, intersections and landmarks.
- c. I would say, however, that the matrix of urban blocks to the east of the SANG, primary local centre and playing field is less well provided for in these respects. This will be problematic because there is poor physical connectivity across the entire northern and eastern edge of the site to land beyond; there are no local built or natural landmarks within or beyond the site to provide vistas or aid orienteering; and there appear to be no alternative uses or open spaces proposed for within these areas of development. The primary road and convergence of routes on the location of the health centre may alleviate some of this concern, which I sense was also felt by the designer as the Masterplan appears to show enhanced nodes to some of these urban blocks. I would not say that this is a significant issue, however, as most of the blocks in this area of the site either front the SANG, Spratt's Plantation, the eastern

edge or the playing fields and these spatial differences arising from position should assist in legibility.

### 3.7 Design and Access Statement

I have the following comments to make on those parts of the DAS relevant to my areas of interest:

#### Townscape Analysis –

- a. I judge it highly commendable for this section to be included and judge that it evidences the abilities of the designers in analysing townscape of similar scale or character. This provides comfort that the designers do know what they are talking about; and also provides, of course, useful lessons to be learned through contextual analysis.
- b. Martlesham Heath is such an interesting case study. I recall that we took the CABE reviewers of the first Adastral Park application on a tour of it as a local exemplar back in 2008 and they were surprised by what they saw! Whilst we were admiring the extent of green space and green stuff in general, all that CABE saw were isolated pockets of cul-de-sac design with acres of close-boarded fencing lining the main loop road, with few dwellings fronting it. I think we now know better that roads need to be addressed and enclosed by built form and that they are important dynamic elements that dwellings should not turn their back on. It also made me think that too much green space can be a bad thing in fragmenting townscape and producing over-scaled spaces that are disproportionate to built form. Urban form is also about creating spaces out of the buildings that enclose them – sometimes these spaces can be green or hard – but it is about built form, primarily. Big green spaces are what the countryside is for.
- c. Ravenswood is also of interest and I was briefly involved in producing a development brief for a later phase of development when I worked as part of the urban design team at Ipswich Borough Council. Through that brief I tried to engineer a tilt away from the neo-vernacular that prevailed in the earlier phases (with mixed results). So interested in this idea of ‘village greens’ alongside Parisian-style boulevards was the philosopher Alain de Botton that he featured Ravenswood in his Channel 4 documentary, *The Architecture of Happiness*, on why the Dutch are content with contemporary, unlike the British. I sincerely hope that at this application site next to Adastral Park we can help create an honest townscape of the 21<sup>st</sup> century.

#### Vision and Design Principles

- a. The stated Design Principles (pp46-47) are clearly articulated and unobjectionable and complement the preceding Vision Statement in which the aspiration for ‘*high quality, well designed and contemporary new homes*’ is expressed. I see this phrase as being of critical importance once the DAS is included in any approval, as I can imagine that we will use it on a regular basis in design discussions with those seeking to develop the site over the next 5-7 years or so.

#### Design and Placemaking

- a. Reading the introduction here it is strongly apparent how the utilisation of existing open and green space and the linking to it of newly created open and green space has been the key design driver for the layout strategy at this site.
- b. It perhaps would have been useful to have had a clear response from Historic England to the suggestions here and elsewhere in the application, about how the Scheduled Monuments will be treated. Reference is made to the clearance of trees, management of rabbits and their warrens, introduction of railings, planting suggestions and an idea for interpretation of these important designated heritage assets. Is this approach broadly welcome and considered appropriate by Historic England? If not, are there better ways that can be

considered here. This element of the application is still somewhat unresolved in the absence of detailed consideration by HE of these matters, in the light of their objection.

- c. I judge the sections on Built Form to be relatively clearly laid out. These will provide the design framework for individual elements of the layout that share similar spatial, land use and built form characteristics. Once approved, these will become the working tool to guide but not prescribe the nature of the design of these site elements. On that basis, they provide guidance on aspects such as 'characteristics', 'land use', 'building heights', 'building frontage', 'placemaking', 'boundary treatments' and such like. Some of these aspects are illustrated by sectional streetscenes (a commonly used tool in this format), sketch perspectives, or precedent photographs. In this way, there is a useful balance between written and drawn guidance. It's fair to say, however, that the illustrative content of the Edge Treatments could have been usefully expanded here, resulting in pre-eminence given to the ubiquitous sectional streetscenes, drawings which may be technically appropriate but which do not inspire. I suggest, therefore, that this section of the DAS (pp86-95) needs to be amplified, more detailed and better illustrated to ensure that the standards aimed for here have had the same level of thought applied as the preceding section on The Boulevard.
- d. Primary Local Centre - I am still of the view that the illustrated layout for the primary local centre (pp78-79) is an excellent example of urban design and holds out many and exciting possibilities for the heart of this site to be a highly desirable destination for residents. This is achievable through the imaginative conjunction of a variety of indoor and outdoor uses - seasonal, daytime and evening, weekend and weekday. The strength of the ideas expressed *in toto* for this centre should be adhered to as closely as feasible. We just need to keep in mind what the great Danish urban designer Jan Gehl said – "people go where people are" (or "folk går hvor folk er"). The layout shown here expresses this simple truism in spades.
- e. Following this, I would like to emphasise the importance of a high quality design for the proposed school that will form an anchor development within the primary local centre. The design team that was responsible for many of Suffolk County Council's best schools is, sadly, no longer extant and we will need to ensure that, bearing in mind that the County Council is also a planning authority, we are able to have an early and lasting influence on the quality of the design of the school.
- f. My only reservation in respect of the indicative layout illustrated here is the node marked by a healthcare facility. The idea appears to be for a significant building in terms of its use and design that will close the axial view to the Boulevard from the west and turn the corner onto the primary road to the northern quadrant access. These are desirable urban design aspirations but the reality may be different in that this could be a traffic-dominated traffic junction space with weak edges (open space).
- g. Secondary Local Centre - I welcome the idea of the secondary local centre, somewhat misnamed as it will occupy a highly prominent position close to the principal entrance to the site and be surrounded by the highest density of development anywhere on the entire site. Perhaps it embodies the old fashioned but highly useful idea of the corner shop, maybe with a café attached. I also welcome the idea here of the visual link to Pegasus Tower from this key node. The Tower should certainly be allowed to express its power and presence within the new urban form and be celebrated for the opportunity it will impart for providing true urban character to its new neighbours. On a practical level, definitely 'yes' to parking in front of the shop – it's how this place is going to keep going in business.
- h. A12 Gateway - whilst I do subscribe to the design aspirations expressed here I am of the view that the design should reveal more of itself along the A12 than just at the traffic junction where 'landmark' buildings will signal the entrance to the site. Why cannot the entire frontage be a landmark building of a scale and robustly designed character such that it will be entirely visible behind the landscaped bund? I see no reason why this site should not be seen from the A12 so that its true urban character is revealed to users of the road and

seen in context with Adastral Park, Barrack Square and the retail and business parks beyond. The bund should not become an excuse to hide this scheme along this important edge. I also am not really an enthusiast for 'gateway' or 'landmark' buildings – our towns no longer have defensive walls around them and the idea of the use of 'gateways' here seems to physically reinforce the visual dominance of the bund and the idea of the site as 'protected' or 'enclosed' or, really, 'not at all welcoming'. I note from the 'Noise Appraisal' which is Appendix I (I could not locate the 'Noise Impact Assessment' referred to on p82 of the DAS) that the proposed acoustic bund here will be 5m high. A 2.5 or 3 storey building will, therefore, be higher.

- i. Northern Gateway Node – ditto my comments above on 'landmark gateway buildings'. No thanks.
- j. General guidelines. I judge that both examples of a boulevard prototype illustrated here would be acceptable. It is important that frontage parking is catered for across the length of the boulevard, either on-street or in designed bays. This reflects the thinking in Manual for Streets 2 which has moved away from the use of rear parking courts, as suggested here. Parking a car and accessing it from your house's front door with your shopping etc is an important activity that dynamises frontages and should not be hidden away into un-overlooked rear courts. Thus the boulevard, whilst being a useful thoroughfare to access the primary local centre and the depths of the site, must also be useful in a purposely designed way for the density of residents that will line it.
- k. Main Green Infrastructure Edge – Central. I agree with the aspirations described here except that dwellings that edge the SANG should not have extensive front gardens. The structural planting and SANG can be their front garden.
- l. Main Green Infrastructure Edge – Northern. I think that care needs to be taken with the idea of using low landscaped mounds for partial screening. A low mound has a specific archaeological meaning in the context of this wider landscape and the creation of new ones could be judged inappropriate or confusing.
- m. Main Green Infrastructure Edge – Southern. I have noted that practically all building heights nearly everywhere are expressed as 2-2.5 storeys, which suggests a degree of unintended monotony across this site. Presumably, appropriately sited single storey development is also acceptable?
- n. South Eastern Corridor - I agree with the aspirations expressed here, which show that careful consideration has been given to this important area of the site which currently allows a high degree of visibility into the site from the surrounding landscape. I am pleased that the design guidelines here do not suggest a complete visual screen but a more filtered edge where glimpsed views of the development will be achieved from the surrounding area. There is no reason for this development to be entirely hidden, as if it is unwanted and isn't there.
- o. Ipswich Road Edge – the Noise Appraisal suggests that a 2m acoustic barrier should be positioned along the southern edge of the proposed playing fields here, I think to protect users of this space from road noise from Ipswich Road? I may have misinterpreted the proposal here but I am not at all keen on the idea of an acoustic barrier in such a visually sensitive location and to such an extent proposed.

#### Access and Movement

- a. I welcome the inclusion here of on-street parking as a design objective.
- b. I understand the necessity for the management of traffic speeds but I am wary of the use of designed traffic calming. At Ravenswood, the in-built traffic calming features got out of hand and are a detriment to the experience of the scheme.

### **3.8 Lighting Statement**

- a. I agree with the parameters set out here for the detailed design of lighting impacts across the site to fully take account of the identified 'Intrinsically Dark' character of the surrounding area; and potential impacts on local bat population. Control of lighting overspill from the playing fields adjacent the southern site edge will be particularly important.

### 3.9 Computer Generated Images

- a. Gateway: this is a slightly odd CGI in that the sun appears to be in the wrong position, such that south-facing elevations along the northern edge of the Boulevard are in shadow. I suggest that this image is re-drawn to show the sun and shading correctly positioned. As an illustration it is quite useful in showing how the scheme meets the A12 but it does illustrate, for me, that scale is a vitally important consideration. Both the A12 frontage and the boulevard need to have more appropriately scaled building forms and masses than here, which are shown as rather weak and unimposing in this illustration. Thus, for these reasons, I do not find this CGI particularly appealing or convincing.
- b. Valley Edge: I assume that this is a representation of the built edge along the southern green open space or 'valley corridor' and illustrates some positive features that we would wish to see for edge development: shared space; boundary-free; lower density; limited front gardens; maximum 2-store scale. We would likely prefer a softer edge in terms of the avoidance of terraces, more gaps between dwellings and perhaps more random alignment of dwellings.
- c. Local Centre: this provides a most attractive visualisation of the potential character of the key centre at the heart of the scheme. It illustrates the attractive combination of uses, spaces, building typologies, landscape and routes that are proposed.

### 3.10 Analysis Conclusion

The Government attaches great importance to the design of the built environment and has articulated how this is achievable at Section 7 of the NPPF, detailed particularly in paragraph 58. This detail is, perhaps, more applicable to the reserved matters applications that we shall receive subsequent to any approval here. Of more direct relevance to the current application is paragraph 59 in respect of the use of design codes or design policies. Analogous to these is the Design and Place-making section of the DAS which includes within its sections on Green infrastructure, Built form and Edge treatments, aspirational policies for characteristics, land use, building heights, building frontage, placemaking, mobility and public realm (to give examples). These, in conjunction with the parameter plans, provide the level of guidance that paragraph 59 suggests is appropriate and which I judge to be broadly acceptable.

In agreement with the applicant and agent, we have avoided the requirement for a more prescriptive level of detail or coding on the basis that we wish to facilitate a degree of flexibility and creative freedom in the approaches to the future development of the site. As an alternative way of providing the infrastructure needed to ensure a continuously high quality of design, we could consider the following:

- **Applicants should show evidence of how their development proposal performs against the requirements of the third edition of Building for Life 12 (January 2015) for well-designed homes and neighbourhoods;**
- **Applicants should willingly engage the services of the RIBA Suffolk Design Review Panel or similar at key stages of the design development process;**
- **Applicants who are major developers should consider partnering local design practices for the production of high quality bespoke site-specific schemes; and**
- **In determining applications, great weight shall be given to outstanding or innovative designs which will help raise the standard of design more generally in the area.**



These suggested requirements are inspired by the NPPF and industry good practice and I commend these to you for your serious consideration. These should help ensure, through their application, that, whichever landowner, developer, planning or design officer are involved over the duration of this site, the quality of design enjoys the most prominent level of importance in everyone's consideration and that the planning authority has the tools to resist poor or mediocre design.

#### **4.0 Heritage Assets**

I can confirm that Chapter 7 of Volume 1 of the Environmental Statement, 'Archaeology and Built Heritage' and Appendices D2-D5 of Volume 2a of the same (Heritage Receptor Map; Map Regression; Heritage Statement; Statutory Descriptions for Designated Heritage Assets) meet the information and impact assessment requirements of paragraph 128 of the NPPF in respect of heritage assets that are buildings or structures.

As you know, I have no remit for archaeology and for this area you are being advised directly by Dr Will Fletcher, Inspector of Ancient Monuments at Historic England, who covers the District. You are also being advised directly by Dr Abby Antrobus of Suffolk County Council's archaeological service in respect of unknown finds and sites (evaluation and mitigation).

In determining the application, it is necessary to assess the impact of it on three different types of heritage asset: listed buildings, scheduled monuments and two non-designated heritage assets. Different statutory duties and policy tests apply to each type of asset and I summarise these here.

For listed buildings, s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty to have special regard to the desirability of preserving listed buildings or their settings or any features of special architectural or historic interest which they possess. The duty is engaged when the planning authority is considering whether to permit development which affects a listed building or its setting. Therefore, even if a listed building is not directly affected by a proposed development, the duty will still apply if the development affects the setting of the building. In the case of *East Northamptonshire DC v Secretary of State* ('Barnwell Manor'), the Court of Appeal held that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise; and that a finding of harm to a listed building or its setting gives rise to a "strong presumption" against granting permission.

None of the duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 apply to Scheduled Monuments.

There are no statutory duties concerning non-designated heritage assets.

The National Planning Policy Framework identifies protection and enhancement of the historic environment as an important element of sustainable development. The core planning principles of the NPPF are observed in paragraph 17 which includes the need to 'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life for this and future generations'. Paragraph 131 says that when determining planning applications, account should be taken of 'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation', 'the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality' and 'the desirability of new development making a positive contribution to local character and distinctiveness.'

The NPPF at paragraph 132 requires planning authorities to place ‘great weight’ on the conservation of designated heritage assets, and states that the more important the asset the greater the weight should be. It also recognises that significance can be harmed by development within the setting of an asset. This paragraph also states that ‘any harm or loss should require clear and convincing justification’. It is important to note that this paragraph applies to all designated heritage assets. Therefore, although the statutory duty in s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is not engaged by development outside the boundary of a conservation area, the NPPF makes clear that (i) the conservation area still has a setting and (ii) the approach should be the same for all types of designated heritage asset, therefore harm to the setting of a conservation area should be treated in the same way as harm to a listed building or its setting when a planning application is being determined.

Paragraph 133 of the NPPF applies where development would lead to “substantial harm to or total loss of significance” of a designated heritage asset. Where that is the case, it advises that planning permission should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or four other criteria are satisfied (which relate to the absence of reasonable or viable uses of the asset). In the case of *Bedford BC v Secretary of State for Communities and Local Government*, the High Court said that “substantial harm” meant “such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced”.

Paragraph 134 of the NPPF applies where a development proposal would lead to “less than substantial harm” to the significance of a designated heritage asset. In such cases, it says that the harm (which, as per paragraph 132, must be given great weight) should be weighed against the public benefits of the proposal.

In the case of *Jones v Mordue* the Court of Appeal confirmed that this part of the NPPF corresponds with the statutory duty in s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and, therefore, if a decision maker works through paragraphs 131-134 of the NPPF according to their terms, the statutory duty will have been complied with.

In the case of non-designated heritage assets, paragraph 135 of the NPPF says that the effect of a proposed development on their significance should be taken into account, and that where a development would affect a non-designated heritage asset either directly or indirectly a “balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

The NPPF at Paragraph 137 highlights the opportunity for local planning authorities to look for new development within the setting of heritage assets that will enhance or better reveal their significance. Proposals that therefore preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably. Paragraph 141 makes provision for developers ‘to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact’

With regard to the setting of heritage assets, this is defined in the NPPF glossary. The NPPF states that elements of a setting that make a positive or negative contribution to the significance of an asset may affect the ability to appreciate that significance. The NPPG further advises that the extent and importance of setting is often expressed by reference to visual considerations and that, although views of or from an asset will play an important part, the way in which we experience an

asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. Historic England advises that setting is not a heritage asset, nor a heritage designation. Its importance lies in what it contributes to the significance of the heritage asset.

I have the following comments to make on these parts of the submission:

#### **4.1 Chapter 7 – Archaeology and Built Heritage**

Paragraph 7.5.12 – Historical Overview. Please note that the reference here to Pevsner needs updating as the revised edition for Suffolk (by Dr James Bettley) was published in 2015.

Paragraph 7.5.64 – Contribution of setting to heritage value. I do not agree with the comments here about the existing setting to the Scheduled bowl barrow 450m north-west of Sheep Drift Farm. It is stated here that the existing space around the barrow contributes in a very limited way to its heritage value due to the use of the land for quarrying. This overlooks the importance of the nature of this space as open which is an enduring landscape characteristic and that this open character is a vestige of the historic landscape context for this barrow and the many in this area, such that it contributes importantly (regardless of its current use) to its significance, in my view.

Paragraph 7.5.66 – Pegasus Tower and the Orion building are described here as ‘unattractive features’ which is a somewhat subjective judgment to include (and which is repeated elsewhere) and one with which I happen to disagree. It states here that, somehow, the tower detracts from an appreciation of the heritage value of the barrow. However, the inclusion of a photograph here (Figure 7.4) of the tower in visual conjunction with the barrow and pillbox shows how powerful the juxtaposition of ancient with modern can be and which need not be at all negative.

Paragraph 7.8.185 – I daresay that the matrix approach to formulating ‘heritage value’ (which really means ‘significance’) employed here would arrive at an assessment of ‘Low’ for the brick base of the radio tower. However, this is counter-intuitive when the feature appears to be a rare survival of part of an unusual building, the design for which and its functionality would definitely bear further investigation. Thus, I disagree with the assessment of significance here and suggest that it is higher – after all, it meets four of our NDHA identifying-criteria. I also note that Dr Fletcher of Historic England ascribes the defensive WWII military assets associated with Martlesham Heath airfield a ‘high degree of significance’ which is quite at odds with the assessments being made by Montagu Evans. I agree with Will Fletcher’s assessment.

Paragraph 7.5.192 ff Possible Light Anti-Aircraft Machine gun post. Presumably we will include a Condition requiring recording of this feature prior to its removal. I suggest that this is done to at least Historic England Level 2 (Historic England: Understanding Historic Buildings: A Guide to Good Recording Practice May 2016).

Paragraph 7.5.215 I think it is ill-judged of the author to assess an extant WWII memorial as of ‘low’ heritage value.

#### **4.2 Appendix D2 – Heritage Receptor Map**

This map indicates that the most significant heritage interest in a defined impact radius from the application site is archaeological, namely, the proliferation of Bronze Age barrow burials. This is not surprising given what is known about the preference for the siting of these features (either singly or in groups) in the open heathland landscape that still partly characterises this south-east corner of Suffolk. By contrast, only three listed buildings are identified as ‘receptors’ – a term derived from LVIAs and not one that I ever use – and these are at some distance from the application site with

much intervening landscape, topography and tree cover. Please note that there are no designated heritage assets that are conservation areas in proximity to the application site.

Of value here is the inclusion of Non-Designated Heritage Assets as receptors. Such identification is very welcome as it accords these locally important features the significance that they deserve. In the past, such unprotected features may simply have been ignored in an exercise such as this. It is notable here that the NDHAs thus identified all relate to the military history of RFC/RAF Martlesham which, just to reiterate, goes back to the First World War and the earliest days of the use of aircraft in a combat role.

In respect of the pill box on top of the bowl barrow, this is an interesting example of the re-use of an historic feature akin to Martello Towers, which were re-engaged for use in both world wars for offensive and defensive purposes.

The 'Other Identified Heritage Receptors' are topographically remote and lie so far outside the potential for impacts as to be discountable, in my view, particularly Sutton Hoo. However, it is encouraging that, at least, any kind of impact on this internationally pre-eminent historic site is taken into account and this is only appropriate.

#### **4.3 Appendix D3 - Map Regression**

My only comment here is that it is odd that the tithe maps for Waldringfield (1839) and Martlesham (1837) have not been included here, although I acknowledge that they appear in the Archaeological DBA that forms Appendix D1. The DBA also includes an extract from Hodkinson's 1787 map of Suffolk, which is a vital reference for any map regression exercise.

In terms of historic landscape, heathland represented uncultivated marginal areas usually at the edges of parishes and criss-crossed by multiple footpaths (most of likely ancient derivation). In an area of the County which was enclosed in the medieval period, heathland represented, along with commons, one of the few areas of surviving open landscape and this is evidenced in the map regression until the 20<sup>th</sup> century. This illustrates how long this historic landscape type endured. That this enduring landscape also contained numerous examples of highly visible ancient burial mounds is intriguing to say the least. The heathland landscape of which the application site forms a part has since been developed and exploited but, at least, one of the benefits of the proposed scheme is its partial restoration on a modest scale.

The inclusion here of maps of Martlesham Heath airfield is relevant and of interest. However, please note that it was commonplace to omit areas of military use from detailed illustration on Ordnance Survey maps.

#### **4.4 Appendix D4 – Heritage Statement**

I note from paragraph 1.5 that the Non-Designated Heritage Assets were identified using our adopted and published criteria, which I had not previously realised, and which is very welcome. The criteria are certainly open to be used for the identification of heritage assets that are buildings or structures. The on-site NDHAs include the 8-sided radio tower base, Type 23 pillbox and a light anti-aircraft machine gun post.

Based on the analysis of their significance which is included in the Archaeology and Built Heritage Chapter of Volume 1 of the ES, my own assessment of the relevant NDHA criteria is that all three features meet at least 3 of the criteria - thus ensuring identification – namely being recorded in the Suffolk County HER, Group value and for their Association (with WWII). Further, the radio tower

brick base meets the criterion for Rarity. The more criteria that are met, the greater the significance of the heritage asset.

I would reiterate my view that we need to understand from Historic England – regardless of their other reservations – whether the strategy summarised at paragraph 1.9 for the enhancement, restoration and interpretation is acceptable. I am still in the dark over HE’s views on these matters – vegetation clearing, tree felling, fencing in, interpretation, conversion, restoration – although the strategy to me sounds acceptable. I particularly support the idea of restoring the radio tower brick base and also of procuring an interpretation strategy, although I am not clear on who would provide this, for whom and who would agree it. Also, who will own and maintain these features in the future?

I agree with the conclusion at paragraph 1.22 that the proposed development will have negligible or no effect on the setting of listed buildings identified as heritage receptors outside of the application site. For this reason, therefore, I judge that there will be no harm arising from the proposed development on the setting of any listed buildings and that their setting would, thereby, be preserved. It is not necessary, therefore, to apply the tests in either paragraph 133 or 134 of the NPPF.

#### **4.5 Appendix D5 – Statutory Descriptions for Designated Heritage Assets**

I have no comment to make on the inclusion of these descriptions other than to highlight that the description for the Scheduled barrows within or adjacent the application site emphasises that the importance of these monuments is enhanced by their situation close to each other and that they are among several which remain of a large group of barrows recorded in the area. The description for the barrow surmounted by the Type 22 pillbox notes that this conjunction is of interest and that the pillbox itself is of importance for its WWII provenance.

#### **4.6 The Heritage Park**

The proposal here is to include within the application layout a proposed ‘heritage park’ that will join together in a single space surrounded by built form three heritage assets, consisting of the Scheduled bowl barrow surmounted by a Type 22 pillbox; a Type 23 pillbox; and the octagonal brick base of a former radio tower. The pillboxes and brick base are WWII in origin and served a defensive role in conjunction with the operation of the former RAF Martlesham Heath airfield. The bowl barrow with pillbox is a Designated Heritage Asset that is a Scheduled Monument; the other pillbox and the brick tower base are Non-Designated Heritage Assets.

I note that in her cover letter to you of 19<sup>th</sup> June 2017, the agent describes how the Heritage Park will provide for the conservation of the setting to the bowl barrow and other heritage assets and goes on to list the ways in which this will be achieved, including the creation of a ‘large public open space’ which includes the aforementioned heritage assets. This space, it is claimed, will enhance the opportunity to appreciate these assets individually and as a group and include measures to protect, enhance and interpret these assets. Further, a green corridor will link this space to the SANG and abutting Spratt’s Plantation which contains a pair of protected bowl barrows, thus aiding understanding of the relationship between the Scheduled Monuments.

I note that in his letter to you (the second to be provided during the application period) Will Fletcher reiterates his concern that the proposed development in their setting has the potential to have a serious detrimental impact on the significance of the barrow and WWII features. He ascribes this degree of harm a ‘high magnitude’.

Will accepts the broad principle of a heritage park and acknowledges the opportunity that the park will present to preserve and interpret the heritage assets in-situ. He states that the approach taken here is of 'considerable importance and merit'. I agree with his views here and the designers are to be commended for amending their layout significantly at pre-application stage to accommodate this concept (which was not theirs originally).

Will then goes on to express his reservations regarding the proximity of development to the barrow and the nature of that development. In short, he considers the proposed development to be too close, too dense and over-scaled. He regards the 'buffer' as insufficient. I am not able to comment on buffers or their sizes as this is, I assume, an archaeological term to describe, in some way, a notional area around a Scheduled Monument that should be kept free from significant change (or, perhaps, any change). A buffer is not a concept that is applicable to listed buildings or conservation areas, hence my unfamiliarity with its concept. A buffer is clearly coterminous with setting but may not be the same thing, if the former is less amenable to change.

Of importance in considering Will's views are his acceptance of the heritage park and his acceptance of development within the setting of the barrow. These are the most important points to emphasise in his comments. His disagreement arises from the scale and density of development and he wants these to be more modest than is shown in the application; and proximity. The parameter plans to which he refers are, of course, intended maxima and not designed building heights or densities. Further, Will's views on density here do accord with my own, above, about why this area is subject to the highest density on the entire site and not, more appropriately, in the area around the primary local centre. I do, thus, have some sympathy with his concerns, which will need to be borne in mind when applications come forward for developing this area.

It is not, per se, that Will is objecting to the application because he does not want to see any development impact the barrow's setting or considers that the heritage park is the wrong approach. Development within the setting of the barrow is going to be transformational in terms of the irreversible loss of open space and the permanent change in surroundings to that of peopled built form (or urbanisation). I judge that the scale of this change – which we all accept - is of a greater size and significance than disagreement over the resultant extent of a buffer to the barrow. The point of the heritage park is that it will retain a vestige of the former historic open setting: Will would like for that to be bigger in the area of the barrow than shown, but that's all. I don't think that the difference of views expressed by Will Fletcher and Montagu Evans is, therefore, fundamental or of principle.

From an urban design point of view, it is not necessarily desirable to reduce the scale of buildings that enclose a large open space. Buildings that are too small or are positioned in a dispersed form can create a weak edge that fails to contain space and establish its character. It is not uncommon to find the largest villas, for example, surrounding a Victorian park in an historic town – both because of views gained but also because of the prestige and value associated with such an attractive position. I, myself, therefore would have reservations about reducing the scale and density of buildings that edge the heritage park, as suggested by Will. Further, his suggestion for rear accesses and rear parking courts is arguable, particularly as we would be seeking to actually avoid this elsewhere on this site in following the precepts of good urban design. I should think that it is of lesser importance how the edges of the heritage park will be treated (although still important) and of more importance in considering how the space itself will be designed and, specifically, how the heritage assets will be treated and in their immediate setting also. More feedback from Will on the suggestions for these in the application (and amplified in the previously referred to agent's cover letter) would have been useful to guide us.

#### **4.7 Heritage Assets conclusion**

I judge the idea of bringing all of these heritage assets into a direct spatial relationship with each other within an urban layout a strong one; and support the idea of a visual link between the Scheduled barrow and Pegasus tower. There will be substantial public benefits that are heritage benefits that will arise in terms of the conservation, protection, management and interpretation of these features. Historic England has identified that the effect of the proposed development within the setting of the designated heritage asset that is a Scheduled Monument will cause less than substantial harm to its significance. Historic England has identified that this harm will be of a high magnitude. This is, therefore, less than substantial harm which will need to be given great weight and will need to be weighed by the decision maker against the public benefits of the proposal, as per the test in paragraph 134 of the NPPF. I have already commented on what I consider to be the good quality of the proposal in terms of design and also what I regard to be substantial public benefits that are heritage benefits, above, but there will need to be other public benefits of the proposal which fall outside the scope of these comments and which will need to be taken into account by the decision maker.

Paragraph 135 requires that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In respect of the Non-Designated Heritage Assets that are the Type 23 pillbox and radio tower base I judge that there will be no harm arising from these proposals. The effect of the application on the significance of these heritage assets will, in my view, be entirely positive. For these reasons, therefore, I judge that there would be no harm arising from the proposed development's effect on the significance of the non-designated heritage assets that are the Type 23 pillbox and octagonal brick base to the former radio tower. It is not necessary, thereby, to apply the test in paragraph 135 of the NPPF. In weighing the current application that directly affects the non-designated heritage asset that is a potential light anti-aircraft machine gun post, the decision maker will need to arrive at a balanced judgment having regard to the scale of any harm or loss and the significance of the asset. The gun post is not of very great significance – it is not a designated heritage asset and it has met 3 of the 10 criteria for identification as a non-designated heritage asset. Taking into account the significance of gun post, it is my judgment that its complete loss would result in moderate harm. Loss of the gun post would not be mitigated by its recording prior to removal.

It is the role of the decision maker to strike a balance having regard to the scale of harm and the significance that I have identified, above. This will involve weighing up all of the various material considerations, positive and negative, many of which fall outside the scope of my comments here. It is a matter for the decision maker's judgment how much weight is ascribed to the moderate harm and the significance of the heritage asset that I have identified. Given the overall policy in the NPPF to conserve heritage assets in a manner appropriate to their significance because they are irreplaceable the decision maker will need to find positive factors in weighing the planning balance. I have identified, above, the good quality of the design of the proposed development and also what I regard to be substantial public benefits that are heritage benefits, above, and these are positive factors. There may be many others that are identified in striking the overall balance. Provided that the decision maker, in arriving at their judgment of where the planning balance lies, has had regard to the scale of harm to and significance of the non-designated heritage asset that I have identified, then the terms of paragraph 135 of the NPPF will have been met.

**Robert Scrimgeour**  
**Principal Design and Conservation Officer**  
**18<sup>th</sup> August 2017**

**Appendix 2.**  
**Suffolk County Council Planning Obligations Manager - Consultation Response**



Your ref: DC/17/1435/OUT  
Our ref: Martlesham – Adastral Park 00024253  
Date: 09 October 2017  
Enquiries to: Neil McManus  
Tel: 01473 264121 or 07973 640625  
Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

Mr Ben Woolnough,  
Planning and Coastal Management,  
Suffolk Coastal District Council,  
East Suffolk House,  
Station Road,  
Melton,  
Woodbridge,  
Suffolk,  
IP12 1RT

Dear Ben,

### **Martlesham: Adastral Park – developer contributions**

I refer to the outline planning application for up to 2,000 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 cycle ways, vehicle accesses and associated infrastructure.

This strategic allocation is covered under Policy SP20 of Suffolk Coastal District Council's Local Plan 'Core Strategy & Development Management Policies' Development Plan Document adopted in July 2013. This document contains reference to Adastral Park and several references to infrastructure provision and sustainable development. Strategic Policy SP18 – Infrastructure – this includes ensuring that the infrastructure required to service and deliver new development must be in place or provided at the required phase of the development. Under the chapter on 'Implementation and Monitoring' in paragraph 6.04 it refers to infrastructure constraints with the priority to ensure the delivery of sustainable development including that relating to education. The main driver for required infrastructure improvements is the combination of existing needs and future housing and population growth. At the heart of the NPPF is the delivery of sustainable development, which is the golden thread running through plan-making and decision-taking.

The Adastral Park planning application was submitted with many supporting documents including an 'Illustrative Masterplan Framework' and an 'Education Statement'.

I set out below Suffolk County Council's formal response, which sets out the infrastructure requirements associated with a scheme for up to 2,000 dwellings which should be considered by Suffolk Coastal District Council. The County Council will need to be a party to any sealed Section 106 legal agreement if it includes obligations which are its responsibility as service provider. Without the following contributions being agreed

between the applicant and the local authority, the development cannot be considered to accord with relevant policies.

The National Planning Policy Framework (NPPF) in paragraphs 203 – 206 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

Please also refer to the adopted 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk'.

### **Community Infrastructure Levy**

Suffolk Coastal District Council (the District Council) has adopted a Community Infrastructure Levy (CIL) Charging Schedule for their area which was implemented on Monday 13 July 2015. The District Council has also published a list pursuant to Regulation 123 of the 2010 Regulations i.e. the Regulation 123 List.

However, this site is allocated as a strategic site and, as such, is zero rated for CIL as mitigation will continue to be dealt with by section 106 planning obligations.

I can confirm that in relation to any 'relevant infrastructure' (as defined by Regulation 123 of the Community Infrastructure Levy Regulations 2010 (as amended) which is requested in this letter, since 6 April 2010 no more than four obligations pursuant to Section 106 of the Act have been entered into which provide for the identified infrastructure projects.

### **Planning obligation requirements**

- 1. Education.** Refer to the NPPF paragraph 72 which states 'The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'.

The NPPF in paragraph 38 states 'For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.'

The 'Education Statement' identifies a land reservation of 5.5 hectares for educational use (early years, primary and secondary). This area of land is adjacent to 7.9 hectares of community open space, which will allow for future education playing field use under shared management arrangements. This is a critical issue to resolve because the successful operation of schools requires access to outdoor play space provision.

SCC anticipates the following **minimum** pupil yields from a development of 2,000 dwellings, namely:

- a. Primary school age range, 5-11: 500 pupils. Full contribution towards the build cost of a 420-place primary school, plus contribution for expansion.
- b. Secondary school age range, 11-16: 360 pupils. Proportionate contribution towards the build cost of a new secondary school, with on-site or off-site sixth form provision.
- c. Secondary school age range, 16+: 80 pupils. Proportionate contribution towards the build cost of sixth form provision either at the new on-site secondary school or off-site at existing schools in the east of Ipswich area.

The land reserved for educational use must be rectangular of a minimum size of 5.5 hectares, on level ground and located on a gyratory road (i.e. not in a cul-de-sac) near to the centre of the development and close to other community facilities. The site must be free of contamination and cleared of any previous land use. The developer will also provide services to the appropriate boundary of the site, including adequate access by motor vehicle and on foot, ICT connections, gas, electric and water supplies plus outlet to the local sewer system. In addition, connection into the local surface water drainage system. As the site is currently used for mineral extraction the applicant will need to restore and cap off with topsoil of suitable grade & quality for playing field use. This will all be provided free of charge to the County Council and will need to be covered in the land transfer arrangements as part of the planning obligation. The cost of all archaeological surveys and remedial work will be met by the developer. The unencumbered freehold of the land will be transferred to SCC for £1, with the ability for SCC to transfer the freehold or grant a lease to a provider of state education.

Based on 2,000 dwellings being promoted at Adastral Park this will generate the need for a new 420 place primary school. The contribution sought for the build cost is set out below:

- From 2,000 dwellings SCC anticipates a minimum of 500 primary age pupils.
- Estimated cost of delivering a new 420 place primary school is £7.3m.
- Estimate of build costs are based on Building Bulletin 103 published by the Department for Education and the Education Funding Agency in June 2014. The document aims to assist architects, sponsors and those involved in creating a design brief for new school buildings.
- Cost per place is £7.3m/420 places = £17,381 per place.
- In addition to the 'standard' build cost, allowance must be made for the extra costs incurred for a piled foundations solution. This is because the education land will have been landfilled in accordance with the current inert licence, and that it will be provided with a capping layer to provide a development platform using suitable on-site material. Foundations may well need to be "pile and raft", with 8-9m long piles. Our current estimates assume £125/m<sup>2</sup> to reflect the footprint area given and a single storey building.
- Other considerations will include methane, drainage, and topographical.
- Contribution sought is £7.3m (2017/18 costs); plus, an allowance for the 'non-standard' build costs identified above; plus, an overage contribution for the additional 80 places at £17,381 per place. This overage contribution will be paid on all dwellings more than 1,680 dwellings, at a cost of £4,345 per dwelling (£17,381 x 320 dwellings x 0.25 primary age pupils per dwelling).

- Trigger points for £7.3m contribution payments 20% prior to first dwelling occupation, 20% prior to 200<sup>th</sup> dwelling occupation, 20% prior to 400<sup>th</sup> dwelling occupation, 20% prior to 600<sup>th</sup> dwelling occupation, and 20% prior to 800<sup>th</sup> dwelling occupation. Overage contribution to be from 1,680 dwellings onwards payable prior to 1,700<sup>th</sup>, 1,800<sup>th</sup> and 1,900<sup>th</sup> dwelling occupations.
- All contributions increased in line with the BCIS index.
- The land reserved for education use is to be capable of use i.e. with access/services at any time after 150 dwelling occupations.

#### Temporary classroom costs

- The estimated cost of providing a double temporary classroom (60 places) is £250,000. Based on an average of 0.25 primary age pupils arising per dwelling means that the double temporary classroom will mitigate the impact of 240 dwellings.
- Contribution to be paid prior to occupation of the 1<sup>st</sup> dwelling (BCIS indexed).

#### Primary school transport costs

- Ahead of the opening of the new on-site primary school pupils will need to be offering a place at schools in the locality.
- Transport cost per pupil per annum is £750.
- Prior to first dwelling occupation a contribution of £750 x 10 pupils = £7,500.
- Thereafter an annual assessment on 01 August in each subsequent year will be carried out by the Local (Education) Authority to ascertain the number of primary age pupils directly arising from the Development who are attending schools in the locality. Once this annual assessment has been completed a payment of an appropriate contribution based on the number of pupils' x £750 per pupil (subject to increase in the RPI) will be made to SCC on 01 September in each year.
- The maximum duration of this contribution will be a) 7 years (based on the assumption that some pupils may need to be bussed out of catchment from reception to age 11), or b) not applicable to dwellings constructed once the new primary school is open.

#### Secondary school and sixth form

Based on 2,000 dwellings being promoted at Adastral Park (plus latent need across the east of Ipswich area) this will generate the need for a new 1,200 place secondary school (900 places ages 11-16 and 300 places sixth form). The proportionate contribution sought for the build cost is set out below:

- From 2,000 dwellings SCC anticipates a minimum of 440 secondary age and sixth form pupils.
- Estimated cost of delivering a new 1,200 place secondary school is £23m.
- Estimate of build costs are based on Building Bulletin 103 published by the Department for Education and the Education Funding Agency in June 2014. The document aims to assist architects, sponsors and those involved in creating a design brief for new school buildings.
- Cost per place is £23m/1,200 places = £19,167 per place.

- In addition to the 'standard' build cost, allowance must be made for the extra costs incurred for a piled foundations solution. This is because the education land will have been landfilled in accordance with the current inert licence, and that it will be provided with a capping layer to provide a development platform using suitable on-site material. Foundations may well need to be "pile and raft", with 8-9m long piles. Our current estimates assume £125/m<sup>2</sup> to reflect the footprint area given and a single storey building.
- Other considerations will include methane, drainage, and topographical.
- Contribution sought is 440 places x £19,167 per place = £8,433,480 (2017/18 costs), plus, an allowance for the 'non-standard' build costs identified above.
- Trigger points for contribution payments 20% prior to 250<sup>th</sup> dwelling occupation, 20% prior to 500<sup>th</sup> dwelling occupation, 20% prior to 750<sup>th</sup> dwelling occupation, 20% prior to 1,000<sup>th</sup> dwelling occupation, and 20% prior to 1,250<sup>th</sup> dwelling occupation.
- The sixth form element of the contribution will be capable of being spent off-site at an existing sixth form serving the east of Ipswich area.
- All contributions increased in line with the BCIS index.
- The land reserved for education use is to be capable of use i.e. with access/services at any time after 150 dwelling occupations.

**2. Pre-school provision.** Refer to the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4-year-olds. The Education Bill 2011 amended Section 7, introducing the statutory requirement for 15 hours' free early years' education for all disadvantaged 2-year olds.

From September 2017, working families may get an additional 15 hours' free childcare entitlement per week on top of the current 15 hours, giving a total of 30 hours a week for 38 weeks of the year for children ages 3 & 4.

From these development proposals SCC would anticipate up to 200 pre-school children arising [based on the Section 106 Developers Guide methodology].

In the Wards of Kesgrave West, Kesgrave East and Martlesham the list of current providers includes Rhymes 2, childminder x 2, Heath Primary, Three Bears Pre-School, Humpty Dumpty Pre-School, Martlesham Pre-School, Gorseland Primary, The Roundabout Daycare, The Saplings, Tots Daycare, and Martlesham & Kesgrave Pre-School. Collectively they provide 697 places, with an existing deficit of 25 places forecast across these Wards. On this basis Adastral Park will need to provide new on-site provision.

In respect of early years requirements, the County Council refers to the Department for Education publication '*Statutory framework for the early years foundation stage: Setting the standards for learning, development and care for children from birth to five*' [published: 3 March 2017, effective: 3 April 2017]. This framework is mandatory for all early years providers in England (from 3 April 2017): maintained schools; non-maintained schools; independent schools; all providers on the Early Years Register; and all providers registered with an early years childminder agency.

The suggested strategy for early years' provision is as follows:

- A new 52 place early years setting co-located with the new primary school. The Department for Education (DfE) predicts that 51% of children arising are entitled to the 30 hours per week, so this setting could potentially cater for up to 70 children.
- A new 95 place early years setting to be delivered by the developer by incorporating in the community centre. The DfE predicts that 51% of children arising are entitled to the 30 hours per week, so this setting could potentially cater for up to 126 children. This space will need to be dedicated solely for use by the setting.
- Childminder provision. To provide support and signposting for new homeowners on how to become a registered childminder, as part of the package of measures for community development. The aim being for two new registered childminders to be registered, this would provide the potential for eight early-years places.

The estimated build cost of each early year's place at the new setting co-located with the primary school is £17,538. This is based on actual projects recently delivered or planned in Suffolk. Therefore, based on building a new setting this is 52 places x £17,538 per place, which gives a total contribution of £911,976 (2017/18 costs).

- In addition to the 'standard' build cost, allowance must be made for the extra costs incurred for a piled foundations solution. This is because the education land will have been landfilled in accordance with the current inert licence, and that it will be provided with a capping layer to provide a development platform using suitable on-site material. Foundations may well need to be "pile and raft", with 8-9m long piles. Our current estimates assume £125/m<sup>2</sup> to reflect the footprint area given and a single storey building.
- Other considerations will include methane, drainage, and topographical.



In respect of the setting incorporated into the community centre the table below sets out the space requirements:

Play space	237.5
Kitchen	15
Office	10
Plant	10
Toilets	20
Accessible WC /Staff	7
Secure Lobby	8
<i>Babies</i>	0
<i>Milk Prep</i>	0
<i>Change area</i>	0
Cleaning	5
<i>staff room</i>	15
Circulation	16
Total indoor space	343.5
outdoor space	855
Total site	1670.25

**3. Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Quality in Play' document fifth edition published in 2016 by Play England.

**4. Transport issues.** Refer to the NPPF 'Section 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. Suffolk County Council as Highway Authority FAO Steve Merry/Luke Barber will coordinate this, with a formal written response.

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) considering new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014.

**5. Libraries.** The National Planning Policy Framework (NPPF) Chapter 8 talks about the importance of 'Promoting healthy communities', particularly paragraphs 69 & 70. Paragraph 69 states that "the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities". Paragraph 70 talks about the need to deliver the social, recreational, and cultural facilities the community needs by planning positively for community facilities such

as cultural buildings to enhance the sustainability of communities and residential environments; and to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. There is also the need to ensure that facilities and services can develop and modernise in a way that is sustainable, and retained for the benefit of the community.

This major housing development will result in the local population increasing to something in the region of 5,000 (assuming an average of 2.5 persons per dwelling). The nearest static libraries are at Kesgrave and Woodbridge. This proposal will be an ideal use of space within a community facility at Adastral Park. The request has been reviewed with Suffolk Libraries, which forms the basis of the mitigation sought.

The approach is based on a mix of a deposit collection of lending material with a self-service public terminal, and an outreach visit, branded '*Suffolk Libraries Local*' (SLL), that will deliver activities, events and learning sessions, as well as the usual opportunity to borrow from a supplementary collection of books and audio-visual. The SLL model is currently being piloted, with the intention to rollout across Suffolk.

The costs assume of a fortnightly visit and where costs are pro rata, this is based on the outreach service going to other communities on other days. A small amount of initial pump priming money to fund staffing for the period when the service is establishing, and the community it serves is developing.

The capital contribution towards mitigating the impact of library provision arising from this scheme is £35,190 (circa £18 per dwelling), which is an extremely cost-effective way of providing the new community at Adastral Park with library provision. See tables below:

<b>Element</b>	<b>Estimated cost</b>
Initial stock collection + funding for two years of refreshment and renewal @£12	(£12,000 + (2 x £600)) <b>£13,200</b>
Small shelving bay	£2,500
Stock to be brought on visit days, including two years of refreshment and renewal	(£5,500 <i>pro rata</i> ) <b>£1,100</b>
Self-service machine on premises (assuming wireless connection to exiting internet access)	<b>£600</b>
IT equipment: including Wi-Fi laptop suite for public use, staff laptop, Codapillar or similar, portable Wi-Fi hotspot	(£10,000 <i>pro rata</i> ) <b>£2,000</b>
Other equipment	(£3,000 <i>pro rata</i> ) <b>£600</b>
Venue hire for initial 3 years	<b>£3,000</b>
Support for additional equipment to assist with increased service strain at Kesgrave and Woodbridge Libraries	<b>£4,000</b>
	<b>Total = £27,000</b>



Suffolk Libraries costs for staff, which assumes a fortnightly visit.

Initial funding (capitalised) for funding staffing costs:	
£20/hr x 5 hours x 26 weeks (year 1)	(£2,600+£2,730+£2,860)
£21/hr x 5 hours x 26 weeks (year 2)	
£22/hr x 5 hours x 26 weeks (year 3)	<b>£8,190</b>

**6. Waste.** The strategy is to expand the existing HWRC facility at Foxhall to support housing growth across the east of Ipswich area including Adastral Park.

On this basis a proportionate capital contribution to help fund the expansion costs of the existing HWRC is sought from this major housing development. Based on the most recent estimates for expansion of a HWRC, the construction costs are estimated to be £1.5m (excluding land purchase costs). These build costs include preliminary site investigation works, site works, drainage, external services, access road construction, building works, design, planning, highways, legal and licence fees etc.

Each HWRC serves an average of 29,550 households. On this basis, a proportionate contribution of £51 per dwelling is sought (£1.5m/29,550 households = £51 per dwelling). Total contribution sought is 2,000 dwellings x £51 per dwelling = £102,000.

All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government’s ambition to work towards a more sustainable and efficient approach to resource use and management.

Paragraph 8 of the National Planning Policy for Waste states that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- *New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.*

The Developers Guide sets out the approach to securing developer contributions for waste. The County Council, as Waste Disposal Authority, is pursuing a strategy of reducing reliance on landfill and moving towards alternative methods of disposal, but with the emphasis on waste minimisation and recycling. In terms of the disposal of municipal residual waste the county council has Energy from Waste (EfW) facility serving Suffolk. To meet targets for reducing the land filling of biodegradable

municipal waste under Article 5(2) of the EC Landfill Directive, the EfW facility is the main means of disposal. However, an important part of this overall strategy is encouraging residents to minimise and recycle waste arisings to reduce the need for collection and disposal.

SCC requests that waste bins and garden composting bins should be provided before occupation of each dwelling; to be secured by way of a planning condition. SCC would also encourage the installation of water butts connected to gutter down-pipes to harvest rainwater for use by occupants in their gardens.

In addition, consideration should be given to providing a bring site area within the Local Centre. As part of good design across the whole scheme the district will need to consider issues regarding access for refuse collection vehicles and areas for wheelie bin storage/collection.

7. **Archaeology.** This will be coordinated by Dr Abby Antrobus of SCC.
8. **Ecology, landscape & heritage.** These are matters for Suffolk Coastal District Council to consider and address. In terms of good design, it is suggested that consideration should be given to incorporating suitable roosting and nesting boxes within dwellings for birds and bats, as well as providing suitable biodiversity features including plants to attract & support insects, reptiles, birds & mammals.
9. **Supported Housing.** Refer to the NPPF 'Section 6 Delivering a wide choice of high quality homes' including the need for homes to be designed to meet the changing needs of their residents as they get older. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition, SCC would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the Suffolk Coastal District Council housing team to identify local housing needs.
10. **Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

On 18 December 2014 the Secretary of State for Communities and Local Government (Mr Eric Pickles) made a Ministerial Written Statement (MWS) setting out the Government's policy on sustainable drainage systems. In accordance with the MWS, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that, in considering planning applications:

*"Local planning authorities should consult the relevant lead local flood authority on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure using*

*planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. The sustainable drainage system should be designed to ensure that the maintenance and operation requirements are economically proportionate.”*

The changes set out in the MWS took effect from 06 April 2015.

Suffolk County Council FAO Luke Mitchell will coordinate a consultation response.

- 11. Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting which will allow SCC to make final consultations at the planning stage.
- 12. Health impact assessment.** An assessment of the likely impact of the development proposals on local health infrastructure, facilities and funding will need to be undertaken, in conjunction with a methodology to be agreed with NHS England.
- 13. Superfast broadband.** Refer to the NPPF paragraphs 42 – 43. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.  
  
As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.
- 14. Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of legal costs on work associated with a S106A, if the matter proceeds to completion.
- 15.** The above information is time-limited for 6 months only from the date of this letter.

The planning obligations are required to satisfactorily mitigate the impacts of the proposed development. These impacts arise directly because of the increased population generated by the development in the local area. The provision of such therefore, within a S106, to mitigate for the increased demands on infrastructure from the increased population because of the development, is entirely satisfactory as a matter of principle, having regard to the NPPF, Suffolk Coastal District Council's Core Strategy and Regulation 122 & 123 of the CIL Regulations.

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 & 123 Regulations.

I will be grateful if the above consultation response is reported in full to the decision-taker who will be determining this planning application.

Yours sincerely,



Neil McManus BSC (Hons) MRICS  
Development Contributions Manager  
Strategic Development – Resource Management

cc Pete Mumford/Sonia Docherty, Suffolk County Council  
Steve Merry/Luke Barber, Suffolk County Council  
Floods Planning, Suffolk County Council  
Dr Abby Antrobus, Suffolk County Council

**Appendix 3.**  
**Suffolk County Council Highway Authority –Final Response**

Your Ref: DC/17/1435/OUT  
Our Ref: 570\CON\1377\17  
Date: 03 January 2018  
Highways Enquiries to: luke.barber@suffolk.gov.uk

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**All planning enquiries should be sent to the Local Planning Authority.**  
Email:

The Planning Officer  
Suffolk Coastal District Council

**For the Attention of:** Ben Woolnough

Dear Mr Ben Woolnough

**TOWN AND COUNTRY PLANNING ACT 1990  
CONSULTATION RETURN DC/17/1435/OUT**

**PROPOSAL:** 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.

**LOCATION:** Land To The South And East Of, Adastral Park, Martlesham Heath, Martlesham

**ROAD CLASS:** A12

Notice is hereby given that the County Council as Highway Authority make the following comments:

**Introduction**

This letter is intended to be a full response to the highways and transportation issues related to the above referenced application. The previous response letter, dated 12<sup>th</sup> October 2017, covers the history of the application site in more detail and can be read for background. However, it is intended that this letter is a standalone response covering all relevant matters. Should SCDC be minded to approve the development a series of measures, secured by a combination of draft planning conditions and planning obligations are proposed to adequately mitigate the highways impacts of the scheme.

**Transport Assessment (Version 6)**

A considerable amount of time has been taken by the developers' consultants in their various version of the Transport Assessment, and this process has been subject to detailed scrutiny by SCC.

The Transport Assessment Version 6 (TAv.6) includes a number of scenarios for methods of modelling the traffic flow, these include the applicant's proposed positions (the principal scenario) and a sensitivity test scenario. If the SCC highway response was to be based solely on the principal scenario in the latest formal submission of Transport Assessment Version 6 (TAv.6), we would have no alternative than to respond with a recommendation of 'refusal of permission' on the basis that the current assessment is not sufficiently robust to be sure that the residual impacts will not be severe. The Applicant and their consultants have accepted that the principal scenario in TAv.6 is based on traffic generation assumptions not supported by SCC.

However, TAv.6 also includes what is described as a sensitivity test, the results of which are considered to a broadly adequate assessment of the local transport impacts of the development. The traffic flow

discussions in the remainder of this letter are based on the more appropriate traffic flows as set out in this scenario. The key difference between the two scenarios is the degree that the original agreed trip rates have been discounted based on an 'internalisation factor' and a 'modal shift' target to be secured through a Travel Plan. The agreed Traffic Modelling scenario is based on a 0% internalisation trip discount and 10% Travel Plan reduction factor.

In contrast, the principal scenario is based on a 30% internalisation discount factor which is not considered to be appropriate given that the base trip data is only based on vehicle trips, and therefore any discount would be pure modal shift from motor vehicles to sustainable means of travel, such as walking and cycling. It is considered that this is very unlikely as the vehicle trips from the TRICS sites are likely to be the medium and long-distance trips, and it's likely that the shorter distance trips are already removed from the analysis by only measuring vehicle rates in the first instance. Analysis of the original TRICS sites has shown that most are as sustainable as Adastral Park, and in many cases more so, given their proximity to high quality and frequent public transport services.

The principal scenario also includes a 15% further discount to take account of Travel Plan incentives to encourage sustainable travel. This is supported as a principle, but is found to be 'double counting' when it is also a form of modal shift, and unlikely to be significant as an additional discount factor. To provide an incentive to promote sustainable transport through the site wide Travel Plan a lower, but still challenging discount of 10% has been agreed with the developer, and this is included in the sensitivity test scenario. By removing the 30% 'internalisation' discount factor and reducing the Travel Plan discount factor to 10% the developers' consultants have tested a volume of development traffic, in addition to the baseline traffic, including projected growth, to give SCC a degree of confidence that the 2027 future year forecast traffic flows are such that with appropriate mitigation, the transport impacts will not be severe.

As the application is Outline and the internal layout is a Reserved Matter the traffic modelling has made some assumptions in terms of traffic split across the four site junctions. This is particularly important with the A12 site access as increasing the number of arrivals at this point (where there is a limited stacking space for right turning vehicles) could result in a road safety issue should vehicles in the right turn lane back up into the straight through lanes, which could be moving at speed. Therefore, the design traffic split is based on 55% of the traffic (arrivals and departures) using the A12 site access, and the residual traffic split over the other three. At the design stage it was assumed that 15% would use each. Waldringfield Parish Council have previously expressed a wish that the Western access onto Ipswich Road be downgraded to a lower priority. While this is technically possible it would need to be in the context of the overall split onto this road, so any reduction at the western Access would need to be met by more traffic using the Eastern Access onto Ipswich road, to preserve the same overall turning proportions at Foxhall Road roundabout and the A12 site access.

The detailed design of the overall scheme, and further planning stages, will need to take these factors into account in the overall access strategy and internal road layout design. It will be important to ensure that the access strategy that is implemented remains consistent with that which has been modelled.

The revised A12 mitigation schemes which accompanied the TAv.6 offer some traffic capacity benefits, which are likely to result in improvements to the network performance across the modelled area. Therefore, some of the significant localised projected impacts of the full development traffic are likely to be slightly improved by the revised junction mitigation schemes.

### **Speed Limit and Speed Management Strategy**

All parties agree that a reduced speed limit would be advantageous for the safety and convenience of users of the road. An obligation from the applicant to funding the Speed Limit Process and its implementation will be required.

Suffolk Police previously raised concerns, shared by SCC, that a speed limit by signing alone would have poor compliance, as the A12 was designed as a high speed strategic link. An obligation by the applicant will be required to fund a Speed Management Strategy, with appropriate physical measures to ensure that the proposed speed limits are complied with. It is likely that this strategy will include some form of fixed safety camera installation. The installation, operation and maintenance costs of any infrastructure will be funded through the appropriate Planning Obligation.

The SCC Councillor Speed Limit Panel carried out an initial review of the developers' proposals for reduced speed limits on the A12, Foxhall Road and Newbourne / Ipswich Road. The panel were content that the Foxhall Road (50 mph speed limit) and Newbourne / Ipswich Road (40 mph speed limit) proposals would be broadly acceptable. However, they didn't feel that the reduction to 40 mph on the A12 across the site frontage would be consistent with the role of the A12 as a key strategic road between Ipswich, Felixstowe and Lowestoft. The panel proposed a 50 mph speed limit south from the existing extents at Park & Ride roundabout (A1214) in a southerly direction, to a point south of Foxhall Road roundabout.

Should the Road Safety Audit for the detailed design for the A12 site access junction, and associated Toucan crossing, require a further reduction in speed limit for the safe operation of the junction traffic signals and crossing, an alternative proposal will need to be taken to the Speed Limit Panel, or its successors, for further consideration.

### **A12 Junction Improvements**

Since the previous re-consultation the most significant change to the proposed A12 junction mitigation scheme is the adoption of partial signalisation on Foxhall Road, Gloster Road and Anson Road roundabouts. The traffic signals interrupt the A12 mainline flow to allow for the roundabout capacity to be managed and overall the traffic modelling shows that these options perform better in peak traffic conditions, across a range of measures of network performance. They also provide a degree of control on the approach to the site access junction, and a most consistent approach to the A12 corridor.

Brookbanks have updated the scheme drawings following constructive discussions between the developers, SCC and SCDC. The revised drawings have been subject to Road Safety Audits which have been reviewed by SCC. The revised junction drawings are considered to be an improvement on the original proposals in terms of road safety.

While the current drawings show indicative layouts for the junctions and confirm the form of junction required to mitigate the impacts of the development it is likely that the scheme will evolve through the detailed design and associated Section 278 process.

The A14/A12 Seven Hills roundabout is jointly the responsibility of Highways England (A14) and SCC (A1156 and A12). Approval of both highway authorities will be required to the implementation of the proposed works.

### **Draft Highway Planning Conditions**

Notice is hereby given that the County Council as Highway Authority recommends that permission should only be granted, by The Local Planning Authority, if it includes the conditions included below, which are required to mitigate the development impacts. Omission or modification of any of the proposed planning conditions without the Highway Authority's consent may result in an application that is not acceptable to the Authority having regard to the potential for the residual cumulative impacts of the development to be severe.

#### **Mitigation Phasing Condition**

Condition: No part of the development shall be commenced until the Mitigation Phasing Strategy has been agreed in writing by the LPA in consultation with SCC. The mitigation phasing details will set out the agreed trigger points for highway improvements and the process for approval of these improvements.

Reason: To ensure that the highways mitigation measures are delivered at the appropriate time and that the residual impacts of the development are not severe in highways terms.

#### **Speed Management Condition**

Condition: Prior to the occupation of the number of dwellings set out in the agreed mitigation phasing strategy, the A12 Speed Management Strategy, which will have previously been agreed in writing with SCC and Suffolk Constabulary, shall have been implemented in full, or in phases, as set out in the agreed mitigation phasing strategy.

The effectiveness of the Speed Management Strategy shall be monitored in accordance with the previously agreed Monitoring Strategy. If monitoring indicates that vehicle speeds significantly exceed the



posted speed limit, or serious road safety concerns are raised during Road Safety Audits, further mitigation will be required.

Reason: To ensure that the residual cumulative impacts of the development on the safety of the travelling public are not severe.

#### **A12 Access Junction Condition**

Condition: No other part of the development phase shall be commenced until the new A12 vehicular access junction has been laid out and completed in all respects in accordance with an approved plan based upon the indicative details shown on Brookbanks Drawing 10391-HL-07 Rev. C and been made available for use. The applicant must enter into an agreement with the highway authority to construct the highway works to the detailed requirements of the highway authority.

Thereafter the access shall be retained in the specified form.

Note: The pedestrian and cycle (Toucan) crossing of the A12 carriageway may not be provided until after the Speed Management Strategy has demonstrated that traffic speeds have been reduced to an appropriate level, to ensure the road safety of vulnerable road users.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced, so that that the residual cumulative impacts of the development on the safety of the travelling public are not severe.

#### **Ipswich Road Waldringfield (West) Access Junction Condition**

Condition: No other part of the development shall be commenced until the new vehicular access junction on Ipswich Road Waldringfield (Western Access) has been laid out and completed in all respects in accordance with the indicative details shown on Brookbanks Drawing 10391-HL-05 Rev. E and been made available for use. The applicant must enter into an agreement with the highway authority to construct the new junction to the detailed requirements of the highway authority.

Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety.

#### **Ipswich Road Waldringfield (East) Access Junction Condition**

Condition: No other part of the development shall be commenced until the new vehicular access junction on Ipswich Road Waldringfield (Western Access) has been laid out and completed in all respects in accordance with the indicative details shown on Brookbanks Drawing 10391-HL-04 Rev. D and been made available for use. The applicant must enter into an agreement with the highway authority to construct the new junction to the detailed requirements of the highway authority.

Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety.

#### **Gloster Road Access Junction Condition**

Condition: No other part of the associated Northern Quadrant Access Road development phase shall be commenced until the new Gloster Road vehicular access junction has been laid out and completed in all respects in accordance with the indicative details shown on Brookbanks Drawing 10391-HL-06 Rev. A and been made available for use. The applicant must enter into an agreement with the highway authority to construct the highway works to the detailed requirements of the highway authority. Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety.

### **Refuge and Recycling Bin Presentation and Storage Condition**

Condition: Before each phase of the development is commenced details of the areas to be provided for storage of Refuse/Recycling bins, relevant to that phase, shall be submitted to and approved in writing by the Local Planning Authority.

The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

### **Surface Water Drainage Condition**

Condition: Before each phase of the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from each phase of the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway.

### **Estate Roads Design Condition**

Condition: Before each phase of the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), relevant to each phase of the development, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

### **Estate Roads Construction Condition**

Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

### **Construction Management Plan Condition**

Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques
- d) storage of plant and materials
- e) programme of works (including measures for traffic management and operating hours)
- f) provision of boundary hoarding and lighting
- g) details of proposed means of dust suppression
- h) details of measures to prevent mud from vehicles leaving the site during construction
- l) haul routes for construction traffic on the highway network and
- j) monitoring and review mechanisms.
- K) Details of deliveries times to the site during construction phase

The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase. To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

### **Parking condition**

Condition: Before each phase of the development is commenced, details of the areas to be provided for the manoeuvring and parking of vehicles (including secure cycle storage), relevant to that phase, shall be submitted to and approved in writing by the Local Planning Authority. The development parking arrangements should be generally in accordance with the details set out in the Suffolk Guidance for Parking 2015 edition. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Comments: Suffolk County Council's parking guidance 'Suffolk Guidance for Parking 2015' (SGP) which require minimum car parking levels of 3 spaces per 4-bedroom dwelling and 2 spaces per 2/3 bedroom dwellings dimensioned at 2.5m x 5.0m: Minimum cycle provision of 2 secure covered spaces per dwelling: Minimum garage dimensions 7.0m x 3.0m (internal dimension) with clear doorway minimum 2.4m wide. Reduced minimum internal garage dimensions of 6.0m x 3.0m (internal dimension) will be deemed to count as a parking space provided that additional fixed enclosed storage of minimum size 3m<sup>2</sup> is provided

Reason: To ensure the provision and long-term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

### **Primary School Travel Plan Condition**

No development shall commence on the identified primary school site until details of the travel arrangements to and from the school site in the form of a Travel Plan, including monitoring provisions, has been submitted to and approved in writing by the Local Planning Authority. Thereafter all such measures as may be included in the approved plan shall be put in place and operated at all times in respect of the school site.

Reason: In the interests of sustainable development.

### **Secondary School Travel Plan Condition**

No development shall commence on the identified primary school site until details of the travel arrangements to and from the school site in the form of a Travel Plan, including monitoring provisions, has been submitted to and approved in writing by the Local Planning Authority. Thereafter all such measures as may be included in the approved plan shall be put in place and operated at all times in respect of the school site.

Reason: In the interests of sustainable development

### **Electric Vehicle Charging Point Condition**

Condition: Before the development hereby permitted is occupied a scheme for the provision of electric vehicle charging points to be installed in the development shall have been submitted to the Local Planning Authority and approved in writing.

Reason: To ensure that the development makes adequate provision for electric vehicle charging points to encourage the use of electric vehicles in accordance with paragraph 3.4.2 of the Suffolk Guidance for Parking and paragraph 35 of the National Planning Policy Framework.

### **Cycle Storage Condition**

Condition: Before the commercial development is commenced details of the areas to be provided for secure covered cycle storage for both customers and employees and details of changing facilities including storage lockers and showers shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Note: The employee cycle storage shall be in a lockable facility away from public access to maximise the uptake in cycling among staff.

Reason: In the interests of sustainable development as set out in the NPPF, Strategic Objective SP1 and Development Management Policy DM20 of the 2013 Suffolk Coastal District Local Plan - Core Strategy & Development Management Policies.

**Car Club Condition**

Prior to the occupation of any dwelling, details and the location of an on-site car club will need to be submitted to and approved in writing by the Local Planning Authority in consultation with the Local Highway Authority. The car club shall be implemented in accordance with the approved details at the approved location for a minimum of five years.

Reason: In the interests of sustainable development as set out in the NPPF, Strategic Objective SP1 and Development Management Policy DM20 of the 2013 Suffolk Coastal District Local Plan - Core Strategy & Development Management Policies and reducing the demand for car parking at the application site.

Note: The following draft conditions relate to improvements on the wider highway network in the vicinity of the development site, and necessary to mitigate the traffic growth on the A12 and A14 strategic road network.

**Foxhall Road junction with A12 Roundabout Improvement Condition:**

Condition: Prior to the occupation of the number of dwellings set out in the agreed mitigation phasing strategy, the highway improvement works at Foxhall Road junction with A12, generally as shown on Brookbanks Drawing 10391-HL-40 Rev. A, will have been completed in all respects and open to the public. The applicant must enter into an agreement with the highway authority to construct the new junction to the detailed requirements of the highway authority.

Reason: In the interests of road safety, traffic capacity and accessibility to a key service centre

**Eagle Way and Gloster Road junction with A12 Roundabout Improvement Condition:**

Condition: Prior to the occupation of the number of dwellings set out in the agreed mitigation phasing strategy, the highway improvement works at Eagle Way junction with Gloster Road roundabout junction, generally as shown on Brookbanks Drawing 10391-HL-23 Rev. F, will have been completed in all respects and open to the public. The applicant must enter into an agreement with the highway authority to construct the new junction to the detailed requirements of the highway authority.

Reason: In the interests of road safety, traffic capacity and accessibility to a key service centre

**Eagle Way and Anson Road junction with A12 Roundabout Improvement Condition:**

Condition: Prior to the occupation of the number of dwellings set out in the agreed mitigation phasing strategy, the highway improvement works at Eagle Way junction with Anson Road, generally as shown on Brookbanks Drawing 10391-HL-24 Rev. E, will have been completed in all respects and open to the public. The applicant must enter into an agreement with the highway authority to construct the new junction to the detailed requirements of the highway authority.

Reason: In the interests of road safety, traffic capacity and accessibility to a key service centre

**A14 junction with A12 (Seven Hills) Roundabout Improvement Condition:**

Condition: Prior to the occupation of the number of dwellings set out in the agreed mitigation phasing strategy, the highway improvement works at A12 junction with A14 (Seven Hills), generally as shown on 10391-HL-11 Rev. F, will have been completed in all respects and open to the public.

Note: The details of this junction improvement are subject to further review through the Section 278 process, and will require the full agreement of Highways England (HE) and an associated agreement (between SCC and HE), to be fully funded by the Applicants. In addition, HE will have a separate Technical Checking Fee, which will need to be met in full by the applicants.

Reason: In the interests of road safety, traffic capacity and accessibility to a key service centre

**Barrack Square Pedestrian Link Improvement Condition:**

Condition: Prior to the occupation of the number of dwellings set out in the agreed mitigation phasing strategy, the footway improvement works Barrack Square, generally as shown on Brookbanks Drawing 10391-HL-103 (Original Issue), will have been completed in all respects and open to the public. The applicant must enter into an agreement with the highway authority to construct the new footway to the detailed requirements of the highway authority.

Reason: In the interests of road safety, and accessibility to a key service centre

**Off-Site Footpath 40 Upgrade to Bridleway Condition:**

Condition: Prior to the occupation of the number of dwellings set out in the agreed mitigation phasing strategy, the Public Right of Way improvement works on Martlesham Footpath 40 (FP40), involving upgrading the surfacing and signing improvement works, will have been completed in all respects and open to the public.

Reason: In the interests of road safety and accessibility to a key service centre

**Informatives and Notes****NOTE 04**

It is an OFFENCE to carry out any works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out.

Unless otherwise agreed in writing all works within the public highway shall be carried out by Suffolk County Council.

A fee is payable to the Highway Authority for the assessment and inspection of new vehicular crossing access works and highway improvements deemed necessary to existing the existing highway network due to the proposed development.

**NOTE 05**

Public Utility apparatus may be affected by this proposal. The appropriate utility service should be contacted to reach agreement on any necessary alterations which have to be carried out at the expense of the Applicant.

**NOTE 07**

The Local Planning Authority recommends that Applicant of housing estates should enter into formal agreement with the Highway Authority under Section 38 of the Highways Act 1980 relating to the construction and subsequent adoption of Estate Roads.

**NOTE 12**

The existing street lighting system may be affected by this proposal.

The applicant must contact the Street Lighting Engineer of Suffolk County Council, in order to agree any necessary alterations/additions to be carried out at the expense of the Applicant.

**NOTE 15**

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

**NOTE 19**

The public right of way cannot be lawfully driven along without due authority. This highway must remain unobstructed at all times. It is an offence to disturb the surface of the highway so as to render it inconvenient for public use. Therefore, it is imperative that the surface is properly maintained for pedestrian use during the construction phase and beyond.

The Highway Authority will seek to recover the cost of any such damage which it actions for repair.

**Travel Plan Comments**

The previous letter provided considerable background to the Travel Plan discussions on this site. For simplicity this letter only lists the proposed Planning Obligations and Conditions, below:

To ensure the Travel Plan is effective it will need to be secured by suitable Section 106 obligations and supporting planning conditions for some of the measures:

A Master Travel Plan (the site-wide Travel Plan, or Travel Plan Framework) that incorporates the full outline application is secured by Section 106 obligations to ensure all future occupiers comply with the Site-wide Travel Plan. This will also include the Site-wide Travel Plan Steering Group that will involve all occupiers and stakeholders linked to the implementation of the Travel Plan. This Travel Plan must be revised and updated on an annual basis from first occupation for a minimum of five years, or one year after occupation of the 2000<sup>th</sup> dwelling / final commercial unit, whichever is the longest duration. The various reserved matters applications that are linked to the outline application have planning conditions to ensure they comply with the Master Travel Plan. They must not be able to operate independently of the Master Travel Plan.

- The implementation and developer funding of the Travel Plan Steering Group from first occupation, until one year after occupation of the final dwelling, or commercial unit
- Provision of an approved welcome pack to each dwelling and employee on first occupation
- Securing and implementing remedial Travel Plan measures if the vehicular reduction targets are not achieved, or if the trip rate in the Transport Assessment is exceeded when the site is occupied

The following Section 106 contribution must also be secured:

- Travel Plan Travel Plan Evaluation and Support Contribution - From occupation of the 100<sup>th</sup> dwelling, or first commercial unit for a minimum of five years, or one year after occupation of the final dwelling or commercial unit, whichever is longest. This is to cover Suffolk County Council officer time working with the Site-wide Travel Plan Coordinator and the Site-wide Travel Plan Steering Group and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council will not be able to provide sufficient resource to assisting the ongoing implementation and monitoring of the travel plan and attending various stakeholder meetings (which SCC are likely to have a permanent presence on) arranged by the Site-wide Travel Plan Coordinator and the Site-wide Travel Plan Steering Group, which may result in the failure of the Travel Plan to mitigate the highway impact of this development.

**Draft Section 106 Planning Obligations**

This site will require an extensive package of mitigation measures, as set out in the list of draft conditions above, and also requiring Section 106 financial contributions, as set out in this section. These obligations are required in their entirety to ensure that the residual cumulative transport impacts of the development are not severe. The background to the obligations was set out in detail in the previous letter, for brevity this letter sets out only the 'Heads of Terms', below.

<b>Heads of Terms</b>	<b>Description</b>	<b>Potential Contribution (£)</b>	<b>Proposed Trigger (dwellings)</b>
Speed Limit TRO Contribution	To fund the consultation, and implementation on a reduced speed limit scheme for the affected roads	TBA	Pre-commencement
Speed Management Contribution	To fund measures to ensure traffic speeds are reduced to an appropriate level. Including Commuted Sums for future operational and maintenance costs	TBA	Pre-commencement
Bus Infrastructure Improvement Contribution	To fund bus stop improvements in the vicinity of the site	TBA	Pre-commencement
Bus Service Improvement Contribution	To fund bus services from the site to key destinations, up to a point they become self-financing	TBA	In Tranches to be agreed
Public Rights of Way (PRoW) Improvements	To improve PRoW in the vicinity of the site, based upon an agreed schedule of links for creation, upgrading and rationalisation. #1	TBA	TBA
Off-Site Highways Mitigation Contribution	To fund measures to mitigate in impacts of development traffic on non-strategic routes in the vicinity of the site.	TBA	In Tranches to be agreed
Off-Site Walking and Cycling Contribution	To fund measure to improve the connectivity of the site and walking and cycling routes to key destination in the vicinity of the site. Based on an agreed schedule of improvements. #2	TBA	In Tranches to be agreed
Off-Site Junction Improvement Contribution	To fund junction mitigation on key junctions impacted on by development traffic	TBA	In Tranches to be agreed
Site-wide Framework Travel Plan Obligation	To ensure all future occupiers comply with the Site-wide Travel Plan	Non-Financial	Pre-commencement
Travel Plan Travel Plan Evaluation and Support Contribution	To fund the monitoring of the Travel Plan measures	TBA	100 <sup>th</sup> Dwelling

Notes:

#1 – Schedule of links broadly based on the issues discussed in the meeting held 20<sup>th</sup> December 2017, and the contents of the latest SCC PRoW consultation response. Must include costs for upgrading the status of Martlesham FP40 to Bridleway, where physical works are secured by condition.

#2 – Schedule of improvements broadly based on the issues discussed in the site meeting held 7<sup>th</sup> December 2017 with SCDC and Martlesham PC.

**Summary**

The Adastral Park development site is very large, and it has the potential to significantly increase traffic in the vicinity of the site. The proximity of the site to employment and retail land uses and the strategic highway network are significant factors in assessing the overall transportation impacts of this project. However, it is our overall technical judgement following careful consideration, that if the full mitigation package, as requested by SCC, is realised the residual highways impacts would not be severe. Therefore, on this basis, we would not recommend that SCDC refuses Planning Permission for this development on highways and transportation grounds.

However, should any element of the mitigation package fail to be secured through Planning Condition, agreement and S106 Obligation our position would be that the site cannot fully mitigate its adverse highways and transportation impacts and, given that the residual cumulative transport impacts would be severe, Planning Permission should be refused.

SCC are committed to working with the developers and SCDC in a collaborative way, alongside other stakeholders, to ensure that, if permitted, the site is brought forward as a successful sustainable community.

Yours sincerely,

**Mr Luke Barber**  
**Principal Engineer**  
**Development Management**  
**Strategic Development**



**Appendix 4.**  
**Suffolk County Council Highway Authority – October Response**

Your Ref: DC/17/1435/OUT  
Our Ref: 570\CON\1377\17  
Date: 12 October 2017  
Highways Enquiries to: luke.barber@suffolk.gov.uk

**All planning enquiries should be sent to the Local Planning Authority.**  
Email:

The Planning Officer  
Suffolk Coastal District Council

**For the Attention of:** Ben Woolnough

Dear Mr Ben Woolnough

**TOWN AND COUNTRY PLANNING ACT 1990**  
**CONSULTATION RETURN DC/17/1435/OUT**

**PROPOSAL:** 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.

**LOCATION:** Land To The South And East Of, Adastral Park, Martlesham Heath,  
Martlesham

**ROAD CLASS:** A12

Notice is hereby given that the County Council as Highway Authority make the following comments:

**Introduction**

Adastral Park is a very large residential development of up to 2000 dwellings and supporting infrastructure within the parish of Martlesham in Suffolk Coastal. The site is to the east of the A12 strategic route, which runs from the A14 junction at Seven Hills (J58) in a broadly northerly direction to Lowestoft, Suffolk's second largest town. The site is directly south of the large Adastral Park BT Research Park, and to the west of

Waldringfield and the Deben Estuary, which is a Site of Special Scientific Interest (SSSI). The majority of the residential properties in the existing communities at Martlesham Heath and Martlesham Village are to the west and north and are not contiguous with the current residential proposal. Martlesham Heath is separated from Adastral Park by the A12, therefore connectivity for sustainable modes of travel is likely to be a significant factor in the overall success of any future development at this location.

The proximity to the A12 means that the impacts of the additional development traffic will have to be carefully considered to ensure that this key strategic link remains safe and retains adequate traffic capacity into the future. SCC must be content that the residual transport impacts of the development would not be severe.

In addition to the up to 2000 properties proposed the application includes, an 'all through' school with associated early years provision to provide for the education requirements of the development, considerable public open space areas and ecology mitigation areas, a local centre with retail opportunities and suitable path, cycle tracks and other facilities.

The primary access point is proposed to be a new traffic signal controlled 3-way junction on the A12 between the existing Foxhall Road and BT (Barrack Square) roundabouts. This is proposed to have signal controlled pedestrian and cycle facilities built into the junction.

Secondary access points are proposed onto Ipswich Road, the route to the village of Waldringfield. Two access points are proposed, which will be simple priority (Give-Way) junctions. The junction at the eastern end will also serve the proposed school site.

The final access point is to be delivered later in the programme, around year six of the development, this will formalise the current gated private access to Adastral Park Research Centre and provide a link through to the residential development, if permitted. The land to the north and south of this new adoptable link road is not included in the 'redline' plan, and this area, called the 'Northern Quadrant' will be subject to separate applications, in due course.

As the application is outline only, the internal layout details will be considered as part of a subsequent reserved matters or full application. However, details of the indicative cross sections of the internal streets have been provided for information. The applicants have also supplied a series of rendered visualisations to help demonstrate the appearance of the proposed scheme, if it was to proceed to construction in the future.

This application is a similar size and location to the previous application, reference C08/1725, for Adastral Park which was consulted on in 2008. This application was withdrawn prior to determination although the highways mitigation package had been agreed between the previous applicants and SCC. However, the current Applicant and associated design team are different to the original application. While the quantum of development is similar as is the general location, there are significant differences between the applications

which make direct comparisons far from straightforward. Details of the previous scheme and mitigation strategy, and the differences with the current proposals are set out in following sections.

### **Pre Application Scoping, Trip Generation and Distribution**

The Applicants' consultants first contacted SCC with some preliminary scoping details in March 2016, however due to a number of outstanding issues the discussions did not begin in detail until October 2016 when a Transport Assessment scope was produced. The scoping exercise included details of the proposed trip rates, traffic modelling and collision analysis. SCC's original opinion was that the original trip rates were not thought to be robust as a number of discounts had been applied, unsupported by evidence. Through the scoping exercise the revised trip rates were agreed, as was the methodology for dealing with future growth. The original scope of the traffic modelling was extended to ensure sufficient coverage, the modelling was primarily by setting up a Paramics Traffic Model to cover the A12 corridor, with additional stand-alone junction modelling for the key junctions remote from the modelled area. The original collision analysis was also felt to be too tight to the development, and a wider scope was agreed.

It was agreed prior to the submission of the application that the scope of the Transport Assessment was suitable to the size of the development, and the residential trip rates proposed were acceptable.

The pre-application discussions around potential mitigation treatments to the key A12 corridor junctions were generally in line with the previously agreed strategy that accompanied the previous application (C08/1725) from 2008. However just before the application was submitted SCDC and SCC were informed that the Applicants were proposing a completely new approach to the junctions, which is set out in the later sections.

Following a series of Traffic Modelling reviews the Applicant indicated that they were intending to revisit the trip rates agreed in the original scoping exercise. This resulting in a Version 5 of the Transport Assessment (TAv.5), consulted on by SCDC on 19<sup>th</sup> September.

While the TAv.5 document reflects some of the ongoing discussions between the development team and SCC it is not based on an agreed Trip Generation Methodology, and as such is not a robust basis for SCC to assess the transport impacts of the scheme on the A12 in the vicinity of the site, and the wider highway network.

The TAv.5 assessment is based upon a smaller quantum of education provision than SCC would expect on a development of this size, this is acknowledged by the Applicants and a full assessment of the traffic resulting from the full Primary, Secondary and Sixth Form education provision has now been undertaken.

The TAv.5 includes an ‘internalisation’ discount on the vehicular trip rate which is not agreed. SCC believe that the baseline assessment already includes similar sites with similar levels of short and medium distance trips carried out by sustainable means. The sites selected by the Applicants for their baseline assessment for the most part have; retail, transport nodes, hospitals and education facilities as closer or closer than does the application site. Therefore, resultant vehicular trip rate is likely to be based on a reasonable assessment and no further discounting would be appropriate. The Applicants have accepted the need to provide a robust assessment and have recently supplied a range of further assessments based on a range of internalisation factors from 0% (SCC’s position) to 30% (as set out in TAv.5).

The TAv.5 includes a further discount on the resulting trip rates, once the internalisation rate above has been factored in, to cover modal shift from vehicular trips to more sustainable modes, delivered through a Travel Plan. In TAv.5 this results in a further discount of 15%. While SCC support the need for ambitious Travel plan measures to ensure that sustainable modes of travel are supported the 15% discount is not accepted. In part, this is because the baseline assessment would also include some degree of modal shift through Travel Plan measures. The Applicant has accepted the need to provide a robust assessment and have now supplied a revised assessment based on a range of Travel Plan modal shift factors from 0% to 15% (as set out in TAv.5). The Applicants have provided a detailed list of potential Travel plan measures to support this assessment, which are commented on in the Travel Plan section of this letter.

While overall model performance is broadly acceptable, it is also important to note that the revised assessment still shows considerable negative impacts on the modelled highways network performance in some specific areas. The independent review of the traffic modelling has highlighted some significant areas of poor performance, specifically in terms of additional average delay, see below table:

**Table 8 - Travel Time per Vehicle by Origin, AM Peak Hour – Seconds Per Vehicle**

<b>Zone</b>	<b>Description</b>	<b>2027 DS</b>	<b>2027 DSS</b>	<b>2027 OTP</b>
32	Black Tiles Lane	346	489	568
39	Development Site	391	389	450
11	Ropes Drive Western Access	184	105	380
31	Access East of Felixstowe Road	223	292	369
38	Development Site South of Main Road	158	260	322
25	Brightwell Road, south of Newbourne Rd	-70	-143	144
4	Main Road, North of Felixstowe Road	70	106	142
22	Eagle Way, West of Barrack Square Roundabout	85	99	142
19	Betts Avenue	75	96	140

The table shows the average additional delay after mitigation (in seconds) for each trip with an origin at the location shown (these represent zones in the model rather than specific locations), the right-hand column shows the impacts with the agreed methodology. For example, traffic starting in the zone represented by ‘Black Tiles Lane’ (Main Road, Martlesham) has an additional average delay of 568 seconds (nearly 10 minutes) compared to the current base year, for the journey time to exit the modelled area. The other data

set worthy of note is the 380 seconds (over 6 minutes) of additional delay for traffic with an origin at Ropes Drive (West). As can be seen there are a range of additional delays, from 568 to 140 seconds. However, only the worst origin points are shown for clarity.

**If the SCC highway response was to be based solely on the latest formal submission of highways related documentation and TAv.5, we would have no alternative than to respond with a recommendation of 'refusal of permission' on the basis that the current assessment is not sufficiently robust to be sure that the residual impacts will not be severe. The Applicant and their consultants accepted that TAv.5 was based on traffic generation assumptions not supported by SCC. They provided further traffic flow data, based on 0% internalisation and a 10% modal shift target to be secured through a Travel Plan. The traffic flow discussions in the remainder of this letter are based on the more appropriate traffic flows as set out in this scenario.**

### **Committed Sites**

The scoping exercise also agreed the approach to committed development sites, and the overall list of sites to be included explicitly was agreed between the applicants, SCDC and SCC. This list included at the time of the application sites, such as Duke's Park in Martlesham, which were subject to ongoing planning appeals. Subsequently this site was not allowed at appeal, but it was retained in the list of committed sites for robustness.

### **Junction Assessment**

Due to the proximity of the site to the A12, and the strategic nature of the route the junction modelling was a key aspect of the scheme that required detailed scrutiny. This was complicated by the late change in A12 junction mitigation strategy.

The previous application (C08/1725) included junction modelling for the assumed future year of the full development (2018) based around a strategy of replacing the A12 roundabouts (Eagle Way / Anson Road, Eagle Way / Barrack Square and Foxhall Road / Newbourne Road) with traffic signal controlled cross roads. This was proposed to mitigate the impacts of the development traffic and projected background growth, and provide a safe means of access to the A12 for current and projected traffic movements. The advantage of traffic signals is that a degree of control can be established to allow for gaps to be formed in the mainline (A12) traffic to allow for traffic to join from the minor arms.

As discussed, the current application has a different access strategy from the previous application, with a new A12 signal controlled junction being formed between the Foxhall and BT roundabouts. The previous 2008 application proposed that access to the site was gained from the existing junctions on the A12 with significant mitigation measures proposed at locations affected by the development. This application as submitted contained a completely different approach from the previous application, and indeed different from the approach taken during the scoping and pre-application consultation with interested local parties.

The existing A12 roundabouts (Eagle Way / Anson Road, Eagle Way / Barrack Square and Foxhall Road / Newbourne Road) are proposed in this application to be retained as roundabouts with varying degrees of carriageway widening to provide additional traffic capacity. The most extensive of these is at Foxhall Road roundabout where four lanes on the A12 approaches have been proposed, and up to three lanes of circulatory carriageway. The two Eagle Way roundabouts are proposed to have more limited widening on the A12 approaches. The proposed arrangements give rise to significant and potentially severe road safety concerns which have not been adequately addressed to date. However alternative, safer, designs for these junctions are possible and this can be dealt with as part of the S278 process.

Due to the importance of the A12 corridor, and the significant number of traffic movements likely to be generated, SCC commissioned an independent analysis of the supplied modelling. This looked at the construction of the baseline traffic model, and the future year projections and potential mitigation schemes. The initial report commented on errors and omissions with the way the base line traffic model had been built up, for the most part these were accepted by the Applicants' consultants. The second report identified more significant concerns with the coding of the traffic model in the future year scenarios, with the result that key impacts were under estimated and the modelling and its conclusions were not considered to be fit for purpose. Following this report the Highways Authority has worked with the LPA and Applicant to resolve the issues raised and is now satisfied that the model and output reflect the theoretical impact of the development in terms of traffic flows and journey times.

The modelled traffic area also includes the A12 junction with the A14 trunk road at Seven Hills. The consultants also carried out a standalone assessment of the strategic A12 / A14 / A1214 junction at Copdock, at this location both the A12 and A14 are trunk road. Trunk roads managed by Highways England although SCC retains an interest in this junction as the A1214 is a county road and the Authority has an interest in Countywide traffic issues. We have worked closely with HE to ensure the impacts on both networks can be mitigated. HE also engaged independent technical advice early in the process and both sets of consultants have worked together to ensure consistency.

### **Speed Limit and Speed Management Strategy**

Linked to the junction mitigation strategy proposed by the Applicant is a desire to reduce the speed limits on Waldringfield Road (also referred to as Newbourne Road), Foxhall Road and the A12. Although the

Applicant has confirmed in writing that they are willing to initiate the process to amend speed limits in accordance with their proposed Speed Limit Strategy (TN33) this would only be after granting of outline planning permission. Therefore, the application as submitted does not include any changes to existing speed limits. Brookbanks Technical Note TN33 has not been included in the public consultation.

Speed Limit Orders are subject to a statutory consultation process and their acceptability and deliverability cannot be assumed. The preferred option, which was put to the Applicants, was for the Highway Authority to process any necessary Speed Limit Orders before the planning application is determined. The Applicant would be expected to pay for the associated costs. If approved, the Speed Limit Order would need to be implemented within 2 years of its approval.

Where a speed limit reduction is considered to be essential to ensure the safety of a development, and this matter has not been resolved pre-planning, the Highway Authority may (in these exceptional circumstances) recommend a negative (Grampian) Condition on a planning consent that 'prevents the development taking place until an Order is in place.' The Highway Authority may consult the Police and Parish Council before recommending such a condition. If the proposed Order is considered unsuitable the Highway Authority will recommend refusal.

If the Order was not granted for any reason then the LPA would be left with an approved development that could not be implemented. This would be a wholly unsatisfactory position.

It became apparent that and Speed Limit Order would not be confirmed prior to determination, and the SCDC Planning Officers and the Applicant were not prepared to accept the risks associated with a Grampian Condition.

Acknowledging the issues identified above and reluctance to progress any Order before determination of this application the Applicant has revised their scheme drawings and Road Safety Audit responses to remove any reference to reduced speed limits. Their position is that the designs are compliant with DMRB at a 70 mph (120 kph) design speed. However, they have provided a written commitment to funding a reduced speed limit (and an associated speed management scheme) which will be implemented concurrent with the early phases of the development, but the development will not be predicated on the success of the Order process. The Applicants have discussed a financial obligation to fund the Speed Limit Order consultation, speed limit signing required, and further speed management measures (potentially including fixed safety cameras), which would be necessary to ensure good compliance with the reduced speed limits, and the associated safety of the road network in the vicinity of the site. This would be necessary to ensure that the development would not have a severe impact on road safety and it is recommended that permission is granted only if an obligation for such provision is secured.



As part of the consultation process SCC carried out informal consultation with Suffolk Constabulary, the traffic enforcement authority and our key road safety partner, to gauge their likely views on any speed limit and speed management proposals linked to this development. Suffolk Constabulary have raised several legitimate concerns about the development, with which SCC concurs. SCC will ensure that Suffolk Constabulary are actively involved in the design and delivery of any highway schemes related to this development, should it proceed, to ensure that their residual concerns are addressed through the design process.

## **A12 Junction Improvements**

The proposed development, if permitted, will require considerable changes to the A12 dual carriageway, which is a key strategic road serving East Suffolk. The Applicants are proposing a new access on the A12 in the form of a traffic signal 3-way junction. The Applicants have also provided details of potential mitigation schemes for the A12 roundabout junctions with Anson Road, Gloster Road and Foxhall Road. The A12 / A14 junction is also proposed to be upgraded, but as that junction is the joint responsibility of SCC and Highways England (HE) it is dealt with separately below.

The A12 access junction is a key feature of the current scheme. Adding a new junction of any type on a high-speed road has the potential to lead to significant road safety issues and the consequences of driver error are likely to be severe. The form of the junction, a traffic signal controlled T junction, is out of context of the junctions either side on the A12, which are proposed to be retained as roundabouts, and this can confuse unfamiliar drivers in some situations.

The main A12 access junction is on the approximate alignment of an existing bridleway and the original junction design incorporated a Pegasus (Equestrian) crossing, however this was downgraded to a Toucan (pedestrian and cycle) crossing on later versions of the design. This junction will require careful design through the Section 278 process, and the Toucan Crossing element will need to be implemented as second phase once the proposed Speed Limit reduction have been put in place and the traffic speeds found to be at an acceptable level for a crossing. The current design, specifically the Toucan Crossing, is not deemed to be safe at the current 70 mph speed limit and measured traffic speeds, and would be an unacceptable risk to road users. The 85<sup>th</sup> percentile speeds need to be below 50 mph for a pedestrian or cycle crossing, according to Traffic Advisory Leaflet 2/03, which we fully endorse. The Applicant is aware of the additional footprint the proposed layout requires at the current design speeds compared to a smaller area required if speeds are reduced to 40mph or less. The detailed design review may highlight that additional land take is required for the delivery of a safe access junction.

The original design for the access junction had only two northbound lanes with right turning and straight-ahead traffic in lane 2 (fast lane). This was later revised to include a dedicated right turn lane, which is a more acceptable layout. However, there is a residual risk that the Adastral Park arrivals (generally higher in the PM peak) will extend beyond the right-hand turn lane capacity, potentially backing up into the high speed straight ahead traffic in lane 2. This would have severe road safety implications, as would resulting high speed lane changing manoeuvres. The traffic modelling provides some indication of the likelihood of this

issue occurring, but careful scrutiny of the detailed design and monitoring of the final scheme will be required to ensure the junction can perform safely, which will require a detailed LINSIG, or similar, review of the junction operation. Thus, it is not clear at this point that the new junction, in its currently proposed form, would not result in severe road safety impacts. Further detailed design and assessment will be necessary before construction of the proposed junction can be permitted by the highway authority.

After the access junction, the next junction most likely to be affected is the A12 junction with Foxhall Road as two of the access point are onto Waldringfield Road, the minor arm of this junction. The proposed mitigation scheme involves localised widening of the A12 approaches to four lanes and the Foxhall and Waldringfield Road approaches to three lanes, to provide additional traffic capacity. It is considered that this degree of widening could have severe safety implications, due to masking of traffic, the risk of injudicious high-speed lane changing on the roundabout and making it difficult to emerge from the minor arms of the junction, leading to injudicious manoeuvres. As such, the proposed layout is considered too dangerous to be permitted under current traffic speeds. In any case, there is considerable doubt as to whether this level of widening is actually deliverable within the highway. The Applicants' consultants have come up with an alternative option with three A12 lanes, which is considered an improvement in terms of road safety, but with less traffic capacity. A test of capacity has been requested to assess the impacts on traffic queuing and junction delay.

The Gloster Road and Anson Road roundabout junctions also have some widening on the A12 approaches which could lead to related road safety issues.

None of the current designs are deemed acceptable on road safety grounds, because their impact is potentially severe, and the proposed layouts will require considerable amendment through the detailed design process and Section 278 Technical Approval process. They will also be subject to further safety assessments and any residual road safety issues will need to be fully resolved to the highway authority's satisfaction. There is a risk of non-deliverability of the scheme should these matters not be resolved.

It is the judgement of SCC that notwithstanding the above concerns, safe and suitable solutions are possible to adequately mitigate the transport impacts of the scheme without having severe impacts. However, it has to be expected that the additional development traffic will result in significant, albeit not severe, delays, and queuing is likely occur throughout the area in peak travel conditions.

### **A12 / A14 / A1156 (Seven Hills) Roundabout**

As discussed earlier the Seven Hills roundabout is jointly the responsibility of Highways England (A14) and SCC (A1156 and A12). SCC endorse the comments made by David Abbott, on behalf of Highway England on their consultants, Aecom. The Section 278 process, and associated Section 6 process, will need to be

conducted with the full approval of Highways England, should the proposed improvements at this location be implemented.

## **Sustainable Transport Modes**

The development site is significantly removed from existing residential developments in the area. This is magnified by the potential severance caused by the A12, which is currently a 70 mph dual carriageway at this location. However, the development proposal does contain considerable local infrastructure such as retail, education and leisure facilities to enable many potential trips to be very short. The applicant has said that on site cycling and walking facilities will be of good quality, and therefore the options for sustainable travel onsite should be reasonably attractive.

The site is just to the west of the Deben Estuary, which is a very popular location for walking and enjoying the attractive river setting. However, it is a very sensitive location, a SSSI, so additional dog walking and recreation could be detrimental to the delicate ecology in the area. For this reason, the sustainable links to the west of the site are not being improved, and the strategy is to retain as much leisure walking on site as possible. A special Suitable Alternative Natural Greenspace (SANG) is proposed for the central section of the site, this is far larger than the usual open space provision for a site of this size and includes the existing lake, which was formed from the extensive excavation works linked to the previous sand extraction occurring on the site.

It is likely that the most likely local destinations for education and employment will be on the opposite side of the A12. Indeed, census data from Martlesham Heath shows central Ipswich as a significant employment destination. Kesgrave and Martlesham Heath have a large existing secondary school and four primary schools which will attract some pupils, in spite of the onsite provision. Martlesham Heath has a local centre with shops and leisure facilities which will also attract trips. While the A12 is a significant barrier to sustainable trips some existing crossing facilities exist and the site access is proposing a new cycle, pedestrian and equestrian crossing to link into the existing bridleway network. At Gloster Road, north of the Northern Quadrant site access there is a well-used cycle and footbridge leading to Martlesham Heath and Kesgrave, further north at the Anson Road roundabout there is a cycle pedestrian underpass, with a similar facility at the Main Road / A1214 roundabout. The site access Pegasus / Toucan crossing, while linking to the existing alignment of Bridleway No. 6 does not have a viable link to Eagle Way, requiring access over third party land.

Due to the location of most facilities at the northern end of the Eagle Way loop the existing crossing points are likely to be on the main desire lines from the development site. It is likely that residents will prefer to walk north through the SANG corridor to Betts Avenue to have a convenient link to the A12 bridge.

Currently the link from the end of Betts Avenue (which is adopted highway) to the PRoW network north of the SANG, is not a publicly assessable link, and there is a gate across it which is generally open to enable

the link to be used. The status of this vital link will need to be confirmed to ensure it can be maintained for future use.

The traffic impacts of the scheme have been assessed by the Applicant taking into account options for sustainable travel such as walking and cycling for short to medium length journeys. This is something that SCC fully supports in principle. However, it will only occur in practice if a considerable investment in cycling and walking is made in the local area to connect the development to local destinations. This will need to be secured through Planning Obligations to fund physical improvements on the road network to make walking and cycling more attractive and also through a fully delivered and stretching Travel Plan, to provide additional incentives for people to make sustainable transport choices.

### **Draft Highway Planning Conditions**

Notice is hereby given that the County Council as Highway Authority recommends that permission should only be granted, by The Local Planning Authority, if it includes the conditions included below, which are required to mitigate the development impacts. Omission or modification of any of the proposed planning conditions without the Highway Authority's consent may result in an application that is not acceptable to the Authority having regard to the potential for the residual cumulative impacts of the development to be severe.

#### **Speed Management Condition**

Condition: No part of the development shall be commenced until the A12 Speed Management Strategy, which will have previously been agreed in writing with SCC and Suffolk Constabulary, shall have been implemented in full. The effectiveness of the Speed Management Strategy shall be monitored in accordance with the previously agreed Monitoring Strategy, and in the event that speeds are not found to be at the agreed level, further mitigation will be required.

Reason: To ensure that the residual cumulative impacts of the development on the safety of the travelling public are not severe.

#### **A12 Access Junction Condition**

Condition: No other part of the development phase shall be commenced until the new A12 vehicular access junction has been laid out and completed in all respects in accordance with an approved plan based upon the indicative details shown on Brookbanks Drawing 10391-HL-07 Rev. C and been made available for use. The applicant must enter into an agreement with the highway authority to construct the highway works to the detailed requirements of the highway authority.

Thereafter the access shall be retained in the specified form.

Note: The pedestrian and cycle (Toucan) crossing of the A12 carriageway may not be provided until after the Speed Management Strategy has demonstrated that traffic speeds have been reduced to an appropriate level, to ensure the road safety of vulnerable road users.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced, so that that the residual cumulative impacts of the development on the safety of the travelling public are not severe.

#### Ipswich Road Waldringfield (West) Access Junction Condition

Condition: No other part of the development shall be commenced until the new vehicular access junction on Ipswich Road Waldringfield (Western Access) has been laid out and completed in all respects in accordance with the indicative details shown on Brookbanks Drawing 10391-HL-05 Rev. E and been made available for use. The applicant must enter into an agreement with the highway authority to construct the new junction to the detailed requirements of the highway authority.

Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety.

#### Ipswich Road Waldringfield (East) Access Junction Condition

Condition: No other part of the development shall be commenced until the new vehicular access junction on Ipswich Road Waldringfield (Western Access) has been laid out and completed in all respects in accordance with the indicative details shown on Brookbanks Drawing 10391-HL-04 Rev. D and been made available for use. The applicant must enter into an agreement with the highway authority to construct the new junction to the detailed requirements of the highway authority.

Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety.

### Gloster Road Access Junction Condition

Condition: No other part of the associated Northern Quadrant Access Road development phase shall be commenced until the new Gloster Road vehicular access junction has been laid out and completed in all respects in accordance with the indicative details shown on Brookbanks Drawing 10391-HL-06 Rev. A and been made available for use. The applicant must enter into an agreement with the highway authority to construct the highway works to the detailed requirements of the highway authority. Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety.

### Refuge and Recycling Bin Presentation and Storage Condition

Condition: Before each phase of the development is commenced details of the areas to be provided for storage of Refuse/Recycling bins, relevant to that phase, shall be submitted to and approved in writing by the Local Planning Authority.

The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

### Surface Water Drainage Condition

Condition: Before each phase of the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from each phase of the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway.

### Estate Roads Design Condition

Condition: Before each phase of the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), relevant to each phase of the development, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

### Estate Roads Construction Condition

Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

### Construction Management Plan Condition

Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques
- d) storage of plant and materials
- e) programme of works (including measures for traffic management and operating hours)
- f) provision of boundary hoarding and lighting
- g) details of proposed means of dust suppression
- h) details of measures to prevent mud from vehicles leaving the site during construction
- i) haul routes for construction traffic on the highway network and
- j) monitoring and review mechanisms.
- K) Details of deliveries times to the site during construction phase

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

## Parking condition

Condition: Before each phase of the development is commenced, details of the areas to be provided for the manoeuvring and parking of vehicles (including secure cycle storage), relevant to that phase, shall be submitted to and approved in writing by the Local Planning Authority. The development parking arrangements should be generally in accordance with the details set out in the Suffolk Guidance for Parking 2015 edition. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Comments: Suffolk County Council's parking guidance 'Suffolk Guidance for Parking 2015' (SGP) which require minimum car parking levels of 3 spaces per 4-bedroom dwelling and 2 spaces per 2/3 bedroom dwellings dimensioned at 2.5m x 5.0m: Minimum cycle provision of 2 secure covered spaces per dwelling: Minimum garage dimensions 7.0m x 3.0m (internal dimension) with clear doorway minimum 2.4m wide. Reduced minimum internal garage dimensions of 6.0m x 3.0m (internal dimension) will be deemed to count as a parking space provided that additional fixed enclosed storage of minimum size 3m<sup>2</sup> is provided

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

## Primary School Travel Plan Condition

No development shall commence on the identified primary school site until details of the travel arrangements to and from the school site in the form of a Travel Plan, including monitoring provisions, has been submitted to and approved in writing by the Local Planning Authority. Thereafter all such measures as may be included in the approved plan shall be put in place and operated at all times in respect of the school site.

Reason: In the interests of sustainable development.

## Secondary School Travel Plan Condition

No development shall commence on the identified primary school site until details of the travel arrangements to and from the school site in the form of a Travel Plan, including monitoring provisions, has been submitted to and approved in writing by the Local Planning Authority. Thereafter all such measures



as may be included in the approved plan shall be put in place and operated at all times in respect of the school site.

Reason: In the interests of sustainable development

#### Electric Vehicle Charging Point Condition

Condition: Before the development hereby permitted is occupied full details of the electric vehicle charging points to be installed in the development shall have been submitted to the Local Planning Authority and approved in writing.

Reason: To ensure that the development makes adequate provision for electric vehicle charging points to encourage the use of electric vehicles in accordance with paragraph 3.4.2 of the Suffolk Guidance for Parking and paragraph 35 of the National Planning Policy Framework.

#### Cycle Storage Condition

Condition: Before the commercial development is commenced details of the areas to be provided for secure covered cycle storage for both customers and employees and details of changing facilities including storage lockers and showers shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: In the interests of sustainable development as set out in the NPPF, Strategic Objective SP1 and Development Management Policy DM20 of the 2013 Suffolk Coastal District Local Plan - Core Strategy & Development Management Policies.

Note: The employee cycle storage shall be in a lockable facility away from public access to maximise the uptake in cycling among staff.

Condition: Prior to the occupation of any dwelling, details and the location of an on-site car club will need to be submitted to and approved in writing by the Local Planning Authority in consultation with the Local Highway Authority. The car club shall be implemented in accordance with the approved details at the approved location for a minimum of five years.

Reason: In the interests of sustainable development as set out in the NPPF, Strategic Objective SP1 and Development Management Policy DM20 of the 2013 Suffolk Coastal District Local Plan - Core Strategy & Development Management Policies and reducing the demand for car parking at the application site.

Note: The following draft conditions relate to improvements on the wider highway network in the vicinity of the development site, and necessary to mitigate the traffic growth on the A12 and A14 strategic road network. No detailed phasing details or interim traffic modelling has been provided so we have made assumptions about the likely trigger points required for these improvements.

Foxhall Road junction with A12 Roundabout Improvement Condition:

Condition: No more than one hundred (100) dwellings shall be occupied until improvement works at Foxhall Road junction with A12 , at the location shown on Brookbanks Drawing 10391-HL-11 Rev. F, have all been completed. The applicant must enter into an agreement with the highway authority to construct the new junction to the detailed requirements of the highway authority.

Note: the details of this junction improvement are not agreed and in their current proposed form are considered to be too unsafe to be permitted within the highway. The design will be subject to further review by the highway authority through the Section 278 approval process.

Reason: In the interests of road safety, traffic capacity and accessibility to a key service centre

Eagle Way and Gloster Road junction with A12 Roundabout Improvement Condition:

Condition: No more than two hundred (200) dwellings shall be occupied until the proposed junction improvements at Eagle Way junction with Gloster Road roundabout junction, at the location shown on Brookbanks Drawing 10391-HL-23 Rev. D, have all been completed. The applicant must enter into an agreement with the highway authority to construct the new junction to the detailed requirements of the highway authority.

Note: the details of this junction improvement are not agreed and will be subject to further review through the Section 278 process.

Reason: In the interests of road safety, traffic capacity and accessibility to a key service centre

Eagle Way and Anson Road junction with A12 Roundabout Improvement Condition:

Condition: No more than two hundred (200) dwellings shall be occupied until the proposed junction improvements at Eagle Way junction with Anson Road, generally as shown on Brookbanks Drawing 10391-HL-24 Rev. B, have all been completed. The applicant must enter into an agreement with the

highway authority to construct the new junction to the detailed requirements of the highway authority.

Note: the details of this junction improvement are not agreed and subject to further review through the Section 278 process.

Reason: In the interests of road safety, traffic capacity and accessibility to a key service centre

A14 junction with A12 (Seven Hills) Roundabout Improvement Condition:

Condition: No more than one hundred (100) dwellings shall be occupied until the proposed junction improvements at A12 junction with A14 (Seven Hills), generally as shown on 10391-HL-11 Rev. F, have all been completed in accordance with details that shall previously have been submitted to and approved in writing by the Local Planning Authority.

Note: the details of this junction improvement are not agreed and subject to further review through the Section 278 process, and will require the full agreement of Highways England (HE) and an associated Section 6 agreement (between SCC and HE), to be fully funded by the Applicants. In addition, HE will have a separate Technical Checking Fee, which will need to be met in full by the applicants.

Reason: In the interests of road safety, traffic capacity and accessibility to a key service centre

## **Informatives and Notes**

### NOTE 04

It is an OFFENCE to carry out any works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out.

Unless otherwise agreed in writing all works within the public highway shall be carried out by Suffolk County Council.

A fee is payable to the Highway Authority for the assessment and inspection of new vehicular crossing access works and highway improvements deemed necessary to existing the existing highway network due to the proposed development.

#### NOTE 05

Public Utility apparatus may be affected by this proposal. The appropriate utility service should be contacted to reach agreement on any necessary alterations which have to be carried out at the expense of the Applicant.

#### NOTE 07

The Local Planning Authority recommends that Applicant of housing estates should enter into formal agreement with the Highway Authority under Section 38 of the Highways Act 1980 relating to the construction and subsequent adoption of Estate Roads.

#### NOTE 12

The existing street lighting system may be affected by this proposal. The applicant must contact the Street Lighting Engineer of Suffolk County Council, in order to agree any necessary alterations/additions to be carried out at the expense of the Applicant.

#### NOTE 15

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

#### NOTE 19

The public right of way cannot be lawfully driven along without due authority. This highway must remain unobstructed at all times. It is an offence to disturb the surface of the highway so as to render it inconvenient for public use. Therefore, it is imperative that the surface is properly maintained for pedestrian use during the construction phase and beyond.

The Highway Authority will seek to recover the cost of any such damage which it actions for repair.

## Travel Plan Comments

The Travel Plan that was incorporated in the Transport Assessment (dated 23rd March 2017) does provide some good overlap in regard to mitigating the highway impact of the Adastral Park development. However, there are some amendments that will need to be made to the document to ensure it stands the test of time, as this development is likely to have a long-term implementation period:

- A Master Travel Plan will need to be secured to ensure the submitted Travel Plan will evolve and adapt throughout the reserved matters applications, in addition to ensuring any potential full applications comply with the agreed Travel Plan. This Master Travel Plan must be implemented in fully by the Site-wide Travel Plan Steering Group that was identified in the Framework Travel Plan. The long-term implementation of the Site-wide Travel Plan Steering Group must be secured by a Section 106 agreement to ensure compliance with the group and the Travel Plan is passed on to future reserved matters applications, so that any future development does not act independently of the Master Travel Plan. All individual residential, commercial and school reserved matters/full application sites must have a permanent presence with the Site-wide Travel Plan Steering Group.
- The build-out of the development and Travel Plan duration seems to have been underestimated, as 2,000 dwellings, the schools and a commercial development are unlikely to be completed in 10 years. This is based on the fact that the Ipswich Ravenswood development of up to 1,400 dwellings is still incomplete, which received outline planning permission in 1998. Also, the Cedars Park development in Stowmarket where the masterplan which was also adopted in 1998 for approximately 1,200 dwellings is yet to be completed as well. Therefore, the implementation period of the Travel Plan will need to be updated to suit a long-term development (possibly in excess of 20 years) and the commitment for the developer to fully fund the Site-wide Travel Plan Coordinator and Site-wide Travel Plan Steering Group until full completion of the development must be included in a revised Travel Plan.
- Further information in regard to the date that the traffic counts were undertaken, which was used to model the highway impact on junctions outside of the PARAMICS model must be included in the Travel Plan or Transport Assessment.
- Also, according to the 2011 Census flow data, there were 275 car journeys from the middle layer for the Adastral Park area (Suffolk Coastal 010) to the Ipswich 014 middle layer, which includes the Ransomes Industrial Estate. As there are currently no realistic alternatives than travelling by car

from Adastral Park to the Ransomes Industrial Estate, there is likely to be some impact on the junctions linking the Industrial Estate to Adastral Park, which includes junction 57 of the A14 and the junctions that serve the industrial estate. Therefore, some further junction modelling should be undertaken to assess if the Adastral Park development will have any negative effect on these junctions and if any further highway mitigation is required.

- There also should be a summary of the 2011 Census Origin-Destination data included that identifies the main employment destinations for the residents that live in the Suffolk Coastal 010 middle layer. This should be broken down into the mode of travel to give an understanding on where the future residents are likely to commute to on a daily basis to focus the Travel Plan measures accordingly.
- There is no reference to the commercial and school element of the development, as the Framework Travel Plan is mainly focused on mitigating the highway impact from residents. A revised Travel Plan will need to include measures to mitigate the impact from the commercial units and the school.

The following measures should be included:

- Secure (in a lockable facility only accessible to employees) cycle storage, showers and changing facilities for each commercial unit
- Welcome packs for each new employee that contains key information from the Travel Plan
- Electric vehicle charging posts
- Full management support for implementing the Travel Plan and automatic enrolment into the Site-wide Travel Plan Steering group
- An employee car share scheme for all employees that work on the commercial development
- A marketing strategy, which should link in to the Travel Plan marketing from the Site-wide Travel Plan Steering Group
- The schools must provide a Travel Plan that is compliant of Modeshift STARS (which SCC currently use for School Travel Plans), with a target to achieve the bronze accreditation within three years of first occupation

- How they will link in with the annual monitoring of the site-wide Travel Plan

The Travel Plan also made reference to discussions with Ipswich Buses to provide a frequent bus service for residents that connects Adastral Park to Ipswich town centre. For this measure to be accepted there will need to be some evidence provided that confirms that Ipswich Buses have actually agreed to provide the improved number 4 bus service in line with the Travel Plan. Also as there are other bus operators that provide services in the area who should also be approached to see if they would be able to provide suitable services for the development.

Strategic Policy SP20 of the Suffolk Coastal District Council Local Plan also makes reference to securing public transport improvements to connect Adastral Park to Felixstowe and Woodbridge.

Has there been any discussions with public transport operators if these improved services can be secured to comply with this policy?

In regard to the Welcome Packs there is no reference to the provision of a multi-modal voucher to encourage residents to travel sustainably. There was some reference to a bus taster ticket of unknown value, however not all residents will be able to use the bus for commuting purposes. Therefore the Travel Plan will need to be revised to offer each dwelling a multi-modal voucher to the value of two one month bus tickets, or cycle voucher of equivalent value to encourage sustainable travel from day one.

The proposed car club measure may require some further amendments, as the £20,000 developer contribution to pump-prime the scheme may not be enough. Based on the cost on other car club schemes, there should be at least £30,000 committed to pump-prime a scheme. This is due to the costs of the vehicle purchase, installation of the telematics, and the ongoing marketing and vehicle running costs of the scheme.

To help reduce the highway impact outside of the development there will need to be a commitment to secure the construction of at least one of the local centres at an early stage of the development. If these amenities are available at an early stage there will be less of a need for residents to travel off-site. The Travel Plan (dated September 2008) that was submitted for the previous Adastral Park application made reference to an Area-Wide Travel Plan, that also incorporated the BT campus. There needs to be some clarification on why BT were not incorporated into the revised Travel Plan, as they do contribute to a large number of vehicular movements on the local highway infrastructure, due to the number of employees that work on the campus. There would be some benefits in incorporating BT with the submitted Travel Plan to possibly secure better sustainable transport measures in the local area.

A revised Travel Plan was submitted in the Updated Transport Assessment TAv.5 (dated 14<sup>th</sup> September 2017) in response to the comments raised above:

- A Master Travel Plan was referenced (Travel Plan Framework) that identifies a suitable structure to manage the Travel Plan across all site users. It also identifies a suitable mechanism to effectively secure the implementation of the site-wide Travel Plan.
- There is still an issue with the 10 year developer funding commitment to the implementation of the Travel Plan, as the development is likely to take longer than 10 years to fully construct. However, this commitment could be resolved through the Section 106 agreement to ensure they are primarily responsible for the implementation of the Master Travel Plan until one year after occupation of the final dwelling or commercial unit. As soon as this timeframe has elapsed the responsibility of the Travel Plan can then be handed over to the steering group.
- The Travel Plan still fails to include 2011 Census information on where residents are likely to commute to work. This should be based on the Origin-Destination data for the Suffolk Coastal 010 Middle-layer. Having this information quickly available to hand in the Interim Travel Plan will help guide the Travel Plan measures when the site starts being occupied. This is a relatively minor issue and can be resolved by a commitment by the applicant to get the Interim Travel Plan approved prior to the commencement of the development.
- The secure cycle parking requirement has not been fully covered in the Travel Plan. The specifications of the cycle parking can be secured by a planning condition that is listed with the other highways conditions.
- There is a reference to the provision of electric vehicle charging. This can also be secured by a planning condition that is listed with the other highways conditions.

All the other issues raised previously have been addressed by the revised Travel Plan.

The requirement for a Travel Plan is in accordance with National Planning Policy Framework paragraph 32, which sets out that plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people.



- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

Other relevant paragraphs include 34, 35, and 36 as well as the “Travel Plans, Transport Assessments and Statements in Decision Taking” section of the 2014 Planning Practice Guidance.

In addition, a decent quality Travel Plan will also support Strategic Policy 20, Strategic Objective SP1 and Development Management Policy DM20 of the 2013 Suffolk Coastal District Local Plan - Core Strategy & Development Management Policies.

To ensure the Travel Plan is effective it will need to be secured by suitable Section 106 obligations and supporting planning conditions for some of the measures:

A Master Travel Plan (the site-wide Travel Plan, or Travel Plan Framework) that incorporates the full outline application is secured by Section 106 obligations to ensure all future occupiers comply with the Site-wide Travel Plan. This will also include the Site-wide Travel Plan Steering Group that will involve all occupiers and stakeholders linked to the implementation of the Travel Plan. This Travel Plan must be revised and updated on an annual basis from first occupation for a minimum of five years, or one year after occupation of the 2000th dwelling/final commercial unit, whichever is the longest duration. The various reserved matters applications that are linked to the outline application have planning conditions to ensure they comply with the Master Travel Plan. They must not be able to operate independently of the Master Travel Plan.

- The implementation and developer funding of the Travel Plan Steering Group from first occupation, until one year after occupation of the final dwelling, or commercial unit
- Provision of an approved welcome pack to each dwelling and employee on first occupation
- Securing and implementing remedial Travel Plan measures if the vehicular reduction targets are not achieved, or if the trip rate in the Transport Assessment is exceeded when the site is occupied

The following Section 106 contribution must also be secured:

- Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum from occupation of the 100th dwelling, or first commercial unit for a minimum of five years, or one year after occupation of the final dwelling or commercial unit, whichever is longest. This is to cover Suffolk County Council officer time working with the Site-wide Travel Plan Coordinator and the Site-wide Travel Plan Steering Group and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council will not be able to provide

sufficient resource to assisting the ongoing implementation and monitoring of the travel plan and attending various stakeholder meetings (which SCC are likely to have a permanent presence on) arranged by the Site-wide Travel Plan Coordinator and the Site-wide Travel Plan Steering Group, which may result in the failure of the Travel Plan to mitigate the highway impact of this development.

All the contributions and obligations have taken into account CIL regulation 122 and are:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

Detailed evidence of how the Travel Plan obligations meet the three CIL tests can be supplied by SCC on request.

Also, suitable wording for the obligations will be supplied by SCC at a later date if planning permission is granted.

### **Draft Section 106 Planning Obligations**

This site will require an extensive package of mitigation measures, as set out in the list of draft conditions above, and also requiring Section 106 financial contributions, as set out in this section. These obligations are required in their entirety to ensure that the residual cumulative transport impacts of the development are not severe.

### **Bus Services and Infrastructure**

It is a key part of the transport strategy for the site that sustainable transport modes of travel are as attractive and convenient as possible, and this includes access to bus routes to key destinations, such as Ipswich town centre and Railway Station. As the site will take some time to fully buildout the bus services proposed will not be financial viable in the initial years of the scheme. Therefore, the Applicants have agreed to 'pump prime' the bus services up to a point at which they become self-financing.

In the initial stages of the development, when only a few small number of bus trips are likely to be generated it is anticipated that the existing Route 4 services to Adastral Park will be sufficient to serve the

development. There will be a requirement to provide a limited enhancement to existing bus stops in the vicinity of the site accesses, to improve accessibility for pedestrians.

Once sufficient dwellings are occupied it is envisaged that a dedicated expansion of the existing services can be provided to link the site, via the internal roads and the access junctions, with key destinations in Ipswich such as Tower Ramparts Bus Station and Ipswich Mainline Railway Station. The services will need to have sufficient capacity and sufficient frequency to be an attractive option for residents.

The bus service contribution is to be secured through the section 106 agreement and the figure is will be confirmed prior to the signing of the Section 106, with a delivery period applicable to the likely buildout period, to ensure funding is available into the future.

In addition, we will be looking to secure improvements to key off site bus stops on the route of the new service, where possible these will be at existing bus stops. The cost of enhancing these is also to be secured through the Section 106 agreement. The closest stops (depending on the initial phase of the development) will need to be upgraded with bus accessible kerbs, Real Time Passenger Information screens and bus shelters. For example, there is a pair of existing bus stops in the vicinity of the proposed site accesses, on Gloster Road adjacent to Barrack Square.

### **Off-Site Highways Mitigation Contribution**

While the site Transport Assessment is based on the assumption that a majority of the generated traffic will use the primary road network to travel from the site to key destinations in Ipswich and further afield, it is acknowledged by the Applicant that there will be some traffic growth outside of the primary road network. This may lead to additional traffic using adjacent residential streets. At this stage it is very difficult to model this potential issue and it is likely that traffic patterns will continue to evolve as the development becomes occupied. The Highway Authority has discussed with the Applicant providing a planning obligation to carry out limited highway improvement on the adjacent residential streets to mitigate any developing traffic issues. At this stage it is envisaged that the roads likely to be affected are as follows:

- Felixstowe Road, Martlesham (between Anson Road and Main Road)
- Gloster Road
- Dobbs Lane
- Bell Lane
- Rural Roads in Brightwell, Newbourne and Waldringfield Heath

However, it is likely that other roads may need to be included in the project as traffic patterns change over the life of the development. The likely highway improvements include, but are not limited to; Reduced speed limits; Road humps / speed cushions / speed tables; Road width restrictions / build outs; Gateway

features; Rumble strips / dragon's teeth road markings; Pedestrian refuges; Signage (including interactive signage); Amended junction arrangements; and Parking restrictions. Any proposals on these affected routes would be subject to stakeholder engagement to determine the most suitable options and in some cases would also be subject to statutory consultation and may need to be amended to deal with any public or statutory objections. The planning obligation will be required to fund the design, consultation and construction of any traffic management measures. Traffic monitoring and public engagement will be used to priorities the routes and the likely mitigation measures. It is likely that the funding secured will only be sufficient to treat the highest priority routes and traffic issues, so it is likely that some of the routes and streets listed above will not be improved as part of the scheme. The value of this contribution will be confirmed prior to the signing of the Section 106.

### **Off Site Sustainable Transport Contribution**

As discussed earlier the Applicant has placed considerable faith in the likelihood of short distance trips around the development and to destinations in the vicinity of the development being carried out by sustainable mean, such as walking and cycling. This will only be achieved with investment in walking and cycling improvements on roads surrounding the site and on key routes to important destinations like Martlesham, Kesgrave, Woodbridge and East Ipswich, including Ipswich NHS Hospital.

It is anticipated that the site internal layout will be designed in such a way to facilitate cycling and walking, and there will be opportunities to ensure that this is delivered through the subsequent Reserved Matters and Section 38 processes, should the site proceed. The site access points onto the A12 and Gloster Road will include walking and cycling facilities, and these matters will be secured through the Section 278 process, including further safety and detailed design reviews.

The improvements to offsite links will need to be secured through an adequate Planning Obligation secured by the Section 106 Agreement. It is anticipated that improvements will be required on links to Beardmoor Park to enable sustainable trips to retail and employment destinations; these could involve pedestrian and cycle crossing facilities, both uncontrolled and signal controlled, provision of widened shared cycle / pedestrian paths, traffic restrictions to better manage parking (where it compromises pedestrian visibility) and increased cycle parking provision.

Most key destinations are west of the A12 dual carriageway, in Martlesham and Kesgrave. Currently there are pedestrian and cycle underpasses beneath the A12 at Anson Road and Main Road, and a below optimum width cycle and pedestrian bridge north of Gloster Road roundabout. All of these facilities are well used by existing residents but all to the north of the Adastral Park development. The Applicant have included potential cycle and pedestrian crossings into the indicative design for the A12 main site access, but this only give access to a currently unsurfaced cross field bridleway, which doesn't lead to any key destinations. The SCC Public Rights of Way team have commented on a separate programme of

improvements required to this route. Existing A12 crossing points may require improvement to deal with the increases in pedestrian and cycle use anticipated to arise from Adastral Park.

Martlesham and Kesgrave have good existing cycle and walking networks through these planned developments, however Rushmere Heath is a barrier to off carriageway cycling routes to the eastern edge of Ipswich. An obligation will be required to investigate suitable options for addressing this gap in cycle provision. There are options to improving cycling links to Woodbridge along Felixstowe Road, and this scheme could also address the potential use of this non-strategic route by development traffic. Main Road and Sandy Lane have some existing cycling signing and limited facilities and these will need to be enhanced to ensure that attractive routes to Woodbridge (which is identified as the closest Railway Station in the TA) and further afield are provided.

Funding will also be required to enhance existing links and road crossings as well as directional signage to all key routes.

### **Off Site Junction Improvement Contribution**

The Applicants traffic analysis has indicated adverse impacts requiring mitigation on three key junctions in East Ipswich, these are Colchester Road junction with Woodbridge Road and Heath Road gyratory, Heath Road junction with Foxhall Road roundabout and Bixley Road junction with Felixstowe Road roundabout. The Applicants' consultants have provided a potential mitigation scheme for each location. However, SCC has an existing project aimed at providing more traffic capacity and improvements to the walking and cycling routes throughout eastern Ipswich, and some work is currently planned for these locations. Therefore, it will be more appropriate for the Applicants to provide a Section 106 contribution to these projects to provide betterment to address any residual impacts arising from their potential development traffic, rather than implementing a partial scheme through Section 278 that would require further amendments in the future as part of a more strategic scheme.

In addition, the development is clearly going to dramatically increase traffic on Foxhall Road, by over 30% in the AM and 24% in the PM peak conditions. Currently the Bell Lane and Dobbs Lane junctions, which are simple priority cross roads, have poor collision records due to traffic turning injudiciously out of the minor arm into Foxhall Road. The increase in traffic will significantly exacerbate this existing issue and will require mitigation. It is likely that the most suitable scheme would be a traffic signal junction upgrade, linked to a review of the speed limit on Foxhall Road.

The Bell Lane junction with Foxhall Road traffic signal upgrade has been requested as part of an unrelated 300 dwelling development, which is currently subject to a Planning Appeal. Should this scheme be implemented prior to Adastral Park then this part of the obligation could be handed back.

### **Public Rights of Way Contribution**

The SCC Rights of Way & Access Service supports the Applicant proposal to establish public access around the perimeter of the site for horse riders and cyclists in addition to that already existing for walkers (unsurfaced public footpaths currently exist around the site) as well as improvements to offsite links to provide suitable circular walks and off carriageway connections to key facilities. Various obligations will be required to fund the legal orders and physical works required to facilitate these connections. For clarity they are split up into geographic areas and are shown on the below plan:



### On site access improvements:

1. A mechanism for providing this new access is to legally create new bridleways by entering into creation agreements with the Applicant, upgrading the existing public footpath network to the status of public bridleway. (ON1 on map)

Funding will be required for the preparation of all the legal order making associated with the creation agreements. (see appendix 1 for details)

Cost for legal order making = £4000 x nos. of agreement required

2. It is anticipated that the creation of new bridleway will be a planning condition and this will also include the requirement for the Applicant to construct the new bridleways to a specification agreed by the Rights of Way & Access Service. This improved access will be surfaced by the Applicant with an all weather, multi-use surface. (ON1)

SCC will be seeking a commuted sum to maintain this new surface.

Commuted sum = TBA

3. Associated with this, funding is required to extinguish those parts of the public footpath network which will no longer be needed:

Martlesham Footpath no.51/Martlesham FP no.30/ Brightwell FP no.9 – path currently alongside and partly within the east edge of the BT site. (ON2)

Martlesham FP no.23 – path currently within paddock adjacent to the site. (ON3)

Waldringfield Bridleway no.9 – path currently within land used as piggery. (ON4)

Cost of order making £4000 x 3 = £12000

Compensation = TBA

### **Off Site Access Improvements**

Despite the on-site provision, there will remain a desire from residents to explore the wider countryside away from the urban environment of the development.

We are seeking funding for Public Information provision, including interpretation boards and signing, see below:

4. Producing information material to guide residents in making choices for on and off- site recreation. This could be included a homeowner's pack, for example promoting walking & cycling routes.

Cost for information provision = £5000

5. Improving the signs and information on the rights of way network around the site to encourages use away from the Deben SPA. This could include new fingerposts showing key destinations and distances, additional waymarking and information/interpretive signs.

Cost for signage and information provision = £10,000

### **North of site**

6. Creation of public bridleway (upgrading existing public footpath, Martlesham FP nos. 40 & 42) to link the north end of the site at Spratts plantation with the Felixstowe Road. All physical works, including the construction of an improved surface to be undertaken by the Applicant to a specification agreed by the Rights of Way & Access Service (as per new on-site bridleways) as part of the s278 agreement. (N1)

Cost of legal order making = £4000

Cost of compensation = TBA

7. Creation of public bridleway from the end of Betts Avenue into the site close to Spratts Plantation. This will link to the proposed bridleway described above. All physical works including the construction of an improved surface to be undertaken by the Applicant to a specification agreed by the Rights of Way & Access Service (as per new on-site bridleways) as part of the s278 agreement. (N2)

Cost of legal order making = £4000

Cost of compensation = TBA

Funding for these two proposals to be released at the start of development.

### **West of site**

8. Diversion of Brightwell Bridleway no. 6 from its current location as a cross field route, onto a natural surfaced headland route linking to Dobbs Lane. This will improve all year round accessibility to walkers, cyclists and riders using the proposed controlled crossing over the A12 from Adastral Park into Ipswich, particularly serving residents who live in the southern part of the site. (W1) (N.B. There is an existing

bridleway at Longstrops, south of Grange Farm, Kesgrave and in due course, we will be seeking improved links between this and Bridleway no. 6)

Cost of order making = £4000

Compensation = TBA

Establishment works = TBA

### **East of site**

Although Waldringfield village will not be promoted as a destination, it will be a significant attraction to the new residents. It would be naïve to believe that there will be no movement and if so, this should be on foot or by bike to ease the existing traffic congestion in the village.

9. Improvements to the surface of the existing bridleways Waldringfield BR no.34 and nos. 29 to an all-weather, multi-use surface. (E1)

Cost of works = TBA

### **South of site**

10. Creation of public bridleway (upgrade of Brightwell FP no.10) to Newbourne to create a safe off-road walking, cycling and horse riding route into Newbourne village. (S1)

Cost of order making = £4000

Compensation = TBA

Establishment works = TBA

11. Improvements to path infrastructure in Newbourne Springs – this Suffolk Wildlife Trust Site is crossed by public footpaths forming a link into Newbourne village and a circular walk south of the site. (S2)

Cost = TBA

The total cost of the Public Rights of Way improvements to be secured through the Section 106 will be confirmed prior to the signing of the agreement.



## Obligations Summary

<b>Heads of Terms</b>	<b>Description</b>	<b>Potential Contribution (£)</b>	<b>Proposed Trigger (dwellings)</b>
Speed Limit TRO Contribution	To fund the consultation, and implementation on a reduced speed limit scheme for the affected roads	TBA	Pre-commencement
Speed Management Contribution	To fund measures to ensure traffic speeds are reduced to an appropriate level. Including Commuted Sums for future operational and maintenance costs	TBA	Pre-commencement
Bus Infrastructure Improvement Contribution	To fund bus stop improvements in the vicinity of the site	TBA	Pre-commencement
Bus Service Improvement Contribution	To fund bus services from the site to key destinations, up to a point they become self-financing	TBA	In Tranches to be agreed
Public Rights of Way Improvements	To improve Public Rights of Way in the vicinity of the site	TBA	TBA
Off-Site Highways Mitigation Contribution	To fund measures to mitigate in impacts of development traffic on non-strategic routes in the vicinity of the site.	TBA	In Tranches to be agreed
Off-Site Walking and Cycling Contribution	To fund measure to improve the connectivity of the site and walking and cycling routes to key destination in the vicinity of the site	TBA	In Tranches to be agreed
Off-Site Junction Improvement Contribution	To fund junction mitigation on key junctions impacted on by development traffic	TBA	In Tranches to be agreed
Travel Plan Travel Plan Evaluation and Support Contribution	To fund the monitoring of the Travel Plan measures	£1000 P.A.	100 <sup>th</sup> Dwelling

## Summary

It is clear that a development of this scale in this location will cause a considerable traffic impact on the public highway in the vicinity of the proposed development, and specifically on the strategic A12 and A14 road network. It is acknowledged that the Applicants and their consultants have undertaken considerable work to ascertain these impacts and work to mitigate them. However, we do not consider that the latest formal submission, TAv.5, is based on realistic assumptions or is a robust assessment of the traffic impacts of the scheme.

SCC acknowledges that the additional information submitted after that latest submission goes some way to addressing these concerns. It is extremely unfortunate that additional information is not, as per our recommendation, included in the final document submitted for public consultation, to ensure greater clarity and oversight of the traffic impacts of this highly controversial scheme.

While some concerns remain about the overall sustainability of the scheme and the likelihood that the extremely stretching targets for sustainable mode share can be achieved, it is our position, on balance, that the adverse traffic impacts of the scheme can be mitigated by the careful scrutiny of the detailed design, and discharge of the requested highways related conditions and provision of suitable Section 106 Planning Obligations. **It is on the basis that the full mitigation package, as requested by SCC, is realised without omission that we would not recommend refusal of Planning Permission. Should any element of the mitigation package fail to be secured through Planning Condition, agreement and S106 Obligation our position would be that the site cannot mitigate its adverse highways and transportation impacts and, given that the residual cumulative transport impacts would be severe, permission should be refused. Should any aspect of the mitigation scheme fail to be delivered in the future the highway authority will take all measures necessary to protect the safety of the travelling public.**

Yours sincerely,

**Mr Luke Barber**

**Principal Engineer**

**Development Management**

**Strategic Development**

**Appendix 5.**  
**Martlesham Parish Council Consultation Responses**  
May, August, October and December 2017

## **Outline Planning Application for up to 2000 Dwellings on land to the South & East of Adastral Park**

*DC/17/1435/OUT – Land to the south and east of Adastral Park - 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.*

### **Introduction**

This document is Martlesham Parish Council's response to the application for 2000 houses.

It starts by giving the planning background to this site; this is for the general readership rather than CEG and Suffolk Coastal District Council (SCDC).

This is followed by an Executive Summary and then a detailed document by document response in table form. We do not oppose the planning application as it forms part of SCDC's agreed Local Plan for the district but we do have many questions and suggestions for improvement.

The Parish Council wishes to express its dissatisfaction at the short timescale, i.e. four weeks including Easter and May bank holiday weekends, given to respond to such a significant planning application and trusts that there will be full ongoing consultation on detailed matters after the closing date for the application.

### **Background**

In 2010 Martlesham Parish Council strongly objected to a planning application submitted by BT for 2000 homes on the land to the south and east of Adastral Park. The BT application never went before Suffolk Coastal District Council's (SCDC) Planning Committee & therefore a decision was never made on it. At that time SCDC's consultation on the draft Local Development Framework Core Strategy (which became the Local Plan) was ongoing. The Local Plan July 2013 states that 'the planned direction of controlled growth is eastwards of the A12 to the south and east of Adastral Park', Strategic Policy SP20 (elsewhere reference is made to a single allocation of 2000 homes). The Parish Council made strong objections to that housing allocation within the Local Plan. Council members presented parishioners' objections at the Public Examination by an independent Inspector into the Local Plan. The Parish Council's objections centred on the impact of such a large development on local amenities, traffic levels/noise/air quality, the Deben Estuary, the AONB, SSSI, schooling and health services etc. However despite our and other nearby parish councils' objections and the very lengthy legal challenge by No Adastral New Town (NANT) the Local Plan was approved with the allocation of 2000 homes.

In 2016 BT sold the site to CEG who have submitted the current application. The reasons for the Council's objections and concerns still remain but the site has now been approved for development within the Local Plan. The Parish Council submitted the site for inclusion within its Neighbourhood Plan area, following government guidelines, but this was refused by SCDC. The Council is therefore now seeking the best possible outcomes for existing and future residents through engagement with CEG, SCDC and Suffolk County Council Highways Department. We are seeking long term solutions to A12 and local route congestion, as well as assurances on healthcare and local services.

## Executive Summary

We would welcome the nature of the outline planning application which has the potential to “deliver a high quality exemplar development built to the highest environmental standards. It offers the opportunity to create a high quality legacy development in very much the same way as the Martlesham Heath village has become” (SCDC 2013 Local Plan). We also refer to the terms of the Local Plan’s SP20 policy which set out the strategy for the area and the infrastructure required.

### Three major concerns still exist:

**The capability of the Transport Infrastructure**, which is already congested at peak times, to cater for this size of development, including growth in the Retail Park. The CEG proposal for traffic lights just at the new junction is welcomed but we (and our Parishioners) still have major concerns on this issue.

**The future of Health Care facilities**: Whilst we understand the land ownership difficulties of significantly extending the current surgery, Martlesham has an aging population which will put further demand on health care. It is likely that the new residents of the development will not have the same needs or mobility issues (i.e. they will be younger), and if a “super surgery” is eventually built centrally to the new development it will be out of balance with its main user base.

**The timely provision of facilities** which will protect the environment, provide an attractive development and ensure the amenity of existing residents while forming a strong Martlesham wide community.

### Our response

There are many other points which are dealt with in the table below which follows the document structure as listed on SCDC’s website plus some added rows where items do not seem to be covered in the application.

The comments are categorized as Clarification Required (**CR**) – something we are not clear on, or further information is required before we can comment fully, Suggested Improvement (**SI**) – suggestions which if taken on board we think will enhance the development, Errors or Omissions (**EO**) - where there is an actual error or information or a topic that seems missing.

We note that a number of our parishioners have given a great deal of thought to the traffic issues and have produced recommendations. We urge CEG, SCDC & SCC Highways to give them serious consideration.

### Comments on Key Application Documents

The following table gives our comments against key relevant application documents and we list our earlier feedback to the developer in the appendices.

**Comments are either:****Clarification Required (CR) Suggested improvement (SI) Error or Omission (EO)**

Document	Page/ Para	Comment	
Application Form		Checked and noted	
Community Infrastructure Levy Form (NA) Sec 106 applies	App 2 Section 106 payment	Pg 39 para 17 no guarantees of 33% affordable housing in section 106 agreements. Also the appendix states that affordable housing will be in line with NPPF rather than the SCDC Local Plan. We insist that the criteria of DM2 are met.	CR
	Para 10	Para 10 mentions recreational avoidance mitigation (RAM) which will be a payment per household to mitigate any impact on the Deben SPA.  No mention here about the effect on the Common (County Wildlife Site) or Western Corridor (SSSI), northern and eastern parts of the Parish within the Area of Outstanding Natural Beauty (AONB) and Special Landscape Areas (SLA), but an argument is made in a later document that there will be no effect on these areas. We disagree with this as until all onsite facilities are provided the new residents are likely to use our existing facilities exacerbating problems with dog fouling and footpath wear and tear.	EO
Site Location Plan		Checked and noted	
Planning Statement	Page 38 Table 10.1	Inference may be drawn by the reader that service from Martlesham Heath surgery is inadequate - but data on NHS Choices shows it to be comparable with the others shown. The last CQC report rated it good in all parameters. Martlesham surgery has 3 GPs. This means the number of patients per GP is just under 2000. (see para 15.4)	SI  EO
Planning Statement	Para 1.7	New health and other facilities and services. We suggest that new facilities should not compete with or be to the detriment of existing local services e.g. surgery and The Square at Martlesham Heath. Existing facilities could be enhanced to provide initial service for the new development.  We quote from the 2017 exhibition board that said "The development will fund a new healthcare facility on site to complement existing facilities and we are liaising with the Council, NHS and local doctor's surgery" however we have NOT seen this statement repeated in the Application.  Continues to state that the development respects the rural character and landscape qualities of the AONB and countryside. We look forward to seeing this reflected in the reserved matters with regarding to design and density.  Infrastructure to be in place at the appropriate phase, and we would like further details of infrastructure phasing.	SI  CR  SI  CR

Planning Statement	Para 2.1	It is stated that there will be no adverse impact on the European sites and we strongly recommend that policy SP 20 is followed. Objective 13 states that there will be access to housing for every member of the community and we welcome this statement.	CR
Planning Statement	Para 2.5	“Infrastructure to support existing communities and potential for future development”- we are not sure what potential for future development means in this case. Does it mean the 2,000 houses or are CEG planning for more?	CR
Planning Statement	Page 25 & 38	Pg 25 and 38 mention the provision of a new surgery within the development. Please refer to our comments on Para 1.7.	
Planning Statement	Para 8.24	Para 8.24 states that the developer is to ensure that the new development is integrated with existing settlements. We are not sure if this has been achieved in the Outline Planning Application, there appears to be a lack of inter connectivity and we welcome early attention to this.	CR
Design and Access Statement	Page 20	There is no adequate, safe metalled cycling or walking route between Martlesham and Woodbridge, so the reference to good cycle network is subject to this major deficiency. The Route 1 cycle route utilises the Old Felixstowe Road; this is narrow, and the marked cycle lane northbound is well below the recommended standard due to lack maintenance of the embankment which has gradually encroached onto the road.	EO
Design and Access Statement	Page 21	The Martlesham Heath surgery is shown in the wrong place - it is part of the village centre	EO
Design and Access Statement	Page 30	One of the characteristics of Martlesham Heath is that with one or two exceptions it was mostly built with a variety of house forms (including bungalows) and sizes in each street. This resulted from the outset in diverse ages of residents and household sizes which gave the feel of a more established village.  Foot paths adjacent to Eagle Way are generally fairly wide, but those through the hamlets etc. are mostly narrow and twisty.  What is the relevance of the “Points to consider” - the village is complete and almost all the remaining open space is protected from development so there is no scope to address the points raised. Cul de sacs have consistently proved to be a popular feature and still are.	SI  EO  EO
Design and Access Statement	Page 41	Note that the footpath shown going north west from the western side of the A12 from the point where the new T junction is located does not actually go anywhere. It terminates at the back garden fence of a house in Lancaster Drive. There are many maps in the documentation showing this path.	SI

Design and Access Statement	Page 45	The integration of the development into the community will be delayed because in the early phase there seems to be little or no non-vehicular access between the site and the rest of the parish. The Martlesham Neighbourhood Plan is set out here <a href="http://martleshamnp.onesuffolk.net/home/vision-statement/">http://martleshamnp.onesuffolk.net/home/vision-statement/</a> and it is regretted that the vision on page 45 does not fully reflect that - the impression is of standalone community	SI
Design & Access Statement  Parameter Plan 2: Building Heights, drawing no.3	Page 54	<p>“The majority of the site is two-storeys with some areas rising to three along the Boulevard and around the local centres. “</p> <p>At the consultation stage the Parish Council was assured that the majority of the site would be two-storey and this was welcomed as there is a general wish that the new development should be in keeping with the semi-rural nature of Martlesham Heath. It is therefore disappointing to see on the building heights drawing that Height Zone 1, up to 2-storey, appears to cover a proportionally lower amount of space than the other zones.</p> <p>We would question the use of Ravenswood and Southwold as examples for ‘Townscape Analysis’. This new development, although adjacent to the Adastral Park business area, is not an addition to an already existing town. Martlesham and Waldringfield are defined as villages. We would not wish the new development to have a predominantly urban feel, which is suggested by Height Zone 3 to the west of the site with heights up to 3-storey &amp; including up to 4-storey. We acknowledge that landmark buildings can enhance an area as on Martlesham Heath but we would wish to avoid the introduction of town houses with high density areas such as in Ravenswood. The Council prefers to see a mix of housing within zones which brings about a greater feeling of community when young, old, singles, couples, families live together.</p>	SI
Design and Access Statement	Page 83 onward	There is little information on the treatment of the western side facing the A12 other than at the entrance area. We have contacted CEG who have agreed to provide an artist’s rendition of the western edge and they have suggested we reserve the right to comment on that when it is available, which may take a few weeks.	CR
Statement Of Community Involvement		Checked and Noted Surprised that the Martlesham Dental Surgery was not on your list.	EO
Site Features Plan		Noted	
Phasing Plan		This needs to show the phasing of the access routes (vehicular and non-vehicular) - the delivery of these is central to meeting the vision statement on page 45.	SI
Illustrative Masterplan Framework		We regret to see that most if not all new community facilities are to be provided well away from the existing communities, which will not help with integration between the new and existing communities. It should be remembered that the arguments given for choosing this site was that it would lead to an integrated community and not a standalone one.	



Green Infrastructure		The central heathland and lake areas are a good idea proving a broad open informal 'natural' area across the whole site from north to south. There is a narrow 'green corridor' shown going from the central area to the western edge of the site, this is fine but would be better if it was a little wider (the width on the plan is not clear). What is needed is a similar 'green corridor' connecting the central heath with the eastern boundary and hence the countryside beyond. These connections with the wider countryside beyond the site boundary are essential to provide connectivity between the newly created 'natural' areas and existing countryside habitats not only for residents benefit but would also help to gradually improve the biodiversity of the newly created areas. Careful management will be needed for these new areas over the long term and this needs to be included in the planning permission.	SI
Play Approach		Play Areas to the West of the site need particular focus because of the higher density of housing being proposed.  Good to see that five play areas are proposed across the site but it is not clear from the plan what size or type they are to be. According to SCDC Local Plan SPG15 (which though old still appears to be current) there are standards for LAPs aimed at younger children and NEAPs targeted at the 8 to 14 age range. Both are needed as well as provision for children over 14. The Trail Activity Zones sound interesting and there is a brief description in the Design and Access Statement. These need to be for all ages including adults and the elderly. All of the 'play' areas and zones need to be accessible to people of all abilities including those less able in some way.	CR  SI
Main Green Infrastructure Area		There is a wide variety of areas and habitats which are encouraging. They enable a varied enjoyment for residents and habitats for a variety of species including specific habitats for nightingales and sand martins. Again careful management will be needed and where there is access it should be suitable for all abilities.	SI
Heritage Park		We have concerns regarding the creation of housing and play areas in close proximity to the barrow. Children being children may consider the barrow to be part of some adventure playground and could cause damage to the monument.	CR
Character Banding Plan		Checked and noted	
Strategic Landscape Scheme		Noted	
Proposed A12 Junction changes General comments		The Park and Ride A12 Main Road A1214 junction is not mentioned. There are serious problems with traffic coming from the South turning right into Main road, it is a very tight turn and they can block north going traffic. This issue will be exasperated with the development. The scope of the 50 mph limit is not shown the same as we have been told verbally – the latest map from CEG confirms 50mph limit from south of the Foxhall Road junction to the A1214 roundabout.	SI  CR

Proposed Western Signalized Access off A12 Dual Carriageway		Noted	
Proposed Priority Junction Eastern Access off Ipswich Road		Noted	
Proposed Priority Junction Western Access off Ipswich Road		Noted	
Proposed Priority Junction North West Quadrant Access		Noted	
Off site Highway Mitigation Foxhall Roundabout Mitigation		Noted	
Off site Highway Mitigation Adastral Park Roundabout and Gloster Road Mitigation		Noted	
Off site Highway Mitigation Martlesham Roundabout Mitigation		<p>This plan shows the highway boundary on the east of the A12 (north of the roundabout) as being to the edge of the amenity path on the Common; this is wrong and the boundary should be shown as at the base of the low embankment. This error does not affect the proposed roadworks. The works proposed for this roundabout are minimal and will not mitigate the effects of increased traffic on traffic leaving Eagle Way and the pedestrian crossing from Manor Road.</p> <p>There is currently a problem with traffic exiting North from Martlesham Heath. Traffic coming from Tesco's going north tends to change lanes just before exiting which stops the flow of traffic from the Heath. There is no room for a filter lane, however lane markings might help - see later comments against Transport Assessment, Part 1, Para 8.21.</p> <p>The revised roundabouts without lights have removed the safety improvements promised to the pedestrian crossing over Eagle Way at Manor Road, just off this roundabout. Could an alternative safety scheme be implemented?</p>	<p>EO</p> <p>SI</p> <p>SI</p>

Off site Highway Mitigation A1189 Bixley Road Foxhall Road Roundabout Mitigation		Noted	
Off site Highway Mitigation A1189 Bixley Road A1156 Felixstowe Road Roundabout Mitigation		Noted	
Off site Highway Mitigation A1214 A1189 Gyratory Junction Mitigation		The highways mitigation map 10391-HL-27 shows that the gyratory system will lose its convenient bus stop which is used particularly by people returning from the hospital. This is a major detriment and needs to be reconsidered.	SI
Key Local Connection Strategy 1 of 2		<p>The nature of the route through the Northern Quadrant is unclear. With the unwelcome decision that Adastral Park will remain fenced in will the route actually be an unpleasant corridor between security fences? It seems to ignore existing buildings and joins Gloster Road when northbound traffic will have limited visibility, have the safety implications been considered?</p> <p>While facilities for dog walking are important we would like to be reassured that areas will exist which will be largely dog free and in particular that the quiet areas of the SANG will have the habitat protected from intrusion, particularly at sensitive times of the year e.g. when ground nesting birds are breeding.</p> <p>There is a key cycle/pedestrian route running from the stopped off Old Felixstowe Road to the south of the Pegasus crossing, into Barrack Square and through the business and retail areas to the cycle priority route on the northern stretch of Old Felixstowe road. This route needs to be seen as a whole with appropriate and coherent safety and signalling provision. The possibility of this is alluded to in the plans.</p> <p>The route from Spratt's plantation going North West eventually to the northern part of Old Felixstowe road could form a convenient non mechanised route for access to the existing and proposed community halls and retail park, this should be encouraged bearing in mind security concerns expressed by residents of Falcon Park.</p> <p><u>Movements to the north and west of the site</u> Generally these are the areas which are the most under strain from the large existing population.</p>	<p>CR</p> <p>SI</p> <p>SI</p> <p>SI</p> <p>SI</p>

		<ul style="list-style-type: none"> <li>• The maps show the Western Corridor and Martlesham Common as open access land with the implication that this will be available to the new residents. While in practice it would be, it should be pointed out that these areas serve as accessible open green space for existing residents while the Common is managed as a nature reserve and part of the Western Corridor is an SSSI. There are already strains produced by the conflicting needs of different parts of the community. The Western Corridor is also in the ownership of a private company owned by the existing residents of Martlesham Heath who pay for its upkeep.</li> <li>• The north of the site links with open countryside which accommodates waymarked trails, cycle routes, the parish's circular walk and other PROW. This area is well used and there is evidence of overuse and conflicts between different users, eg pedestrians, off road cyclists and farmers.</li> </ul> <p>While we recognise new residents will use these areas, because of the strain caused by existing residents we would not like to see further recreational use of these areas actively encouraged. The PROW going through these areas should be managed as routes to other places. This is particularly the case with the bridleway to the west of the proposed Pegasus crossing which could well attract new users because of the convenience of the crossing. A safe crossing of Dobb's Lane will need to be provided for this route which will link to Ipswich and the cycle routes beyond.</p> <p><u>Movements to the south and east of the site</u></p> <p>While not within Martlesham it seems inevitable that these areas will become prime locations for informal recreation. The network of PROWs, quiet lanes and tracks with Ipswich Road remaining a minor access road dictates this. This should be recognised by the provision of circular routes and PROWs which enhance the experience without having an uncontrolled influx into those parishes.</p> <p>In addition to the routes shown the status of the track which begins on Newbourne Road near Martlesham Heath Cottages and crosses Waldringfield Road (a quiet lane) should be clarified as a potential walkers route.</p> <p><u>Public transport</u></p> <p>Beyond showing existing routes the key local connections maps do not deal with this.</p> <p>As mentioned previously, the highways mitigation map 10391-HL-27 however shows that the gyratory system will lose its convenient bus stop which is used particularly by people returning from the hospital. This is a major detriment and needs to be reconsidered.</p> <p>As the development progresses we would like to see a circular bus service which links the different parts of Martlesham with the retail</p>	<p>SI</p> <p>SI</p> <p>CR</p> <p>SI</p>
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		centre and possibly including Woodbridge. There is already an incoherent pattern of express bus routes to Ipswich. The opportunity should be taken to regularise and improve these.	
Key Local Connection Strategy 2 of 2		Covered in 1 of 2 above	
Affordable Housing Statement		This is a long document with no definite proposals other than:- <i>“4.18 It is proposed that the management, allocation of affordable housing to eligible households, distribution, standards and timing of affordable housing delivery will be submitted to and agreed with the Council at Reserved Matters prior to the commencement of development. Initial principles have been explored in this statement in order to set the scene for this discussion.”</i> Thus it is suitably vague and there is no guarantee that a suitable proportion of ‘affordable housing’ in a reasonable mix of size and type will eventually be provided.	EO
Education Statement		We expect the opportunity will be taken to have shared school and community uses of buildings, particularly to provide a generous sports hall.  An economic or land use case is made for the all through school but the brief point about the educational standard of the one example quoted is not reassuring. We would like to see the educational merits of different forms of provision given a higher priority, especially in Suffolk which has a history of poorly performing school structures (Middle Schools).  <u>Quantity of land dedicated to the school</u> We understand that national guidelines exist and must be followed but there is no reason on a Greenfield site not to provide the maximum allowed and rounding down of requirements is unacceptable. The grouping of primary and secondary provision should not be a reason for reducing the footprint of outdoor areas. The different needs of vastly different age groups indicate a need for more land. Shared facilities with the community again provide the opportunity to provide a site at the larger end of the permitted size spectrum.  <u>Phasing</u> We welcome assurances that the provision will come at an early stage of the development but remain concerned for the well-being of early residents. Currently secondary pupils in Martlesham have mainly gone to Kesgrave School or others along the corridor Northgate, Copleston, St. Albans and Farlingaye. To send pupils anywhere else would be inconvenient for travelling and crucially cut these families off from the wider community life that is based upon the schools. The surplus of places at the Ipswich Academy should be an irrelevance to planning. The social and financial success of the development is intrinsically bound up with school catchment areas so certainty about the phasing and the final situation is essential.	SI  CR  SI  EO

		<p>It is assumed that when the school opens it will have a wider catchment area than just the new housing development on the Adastral site.</p> <p>Will the northern access route be in place when the school opens? If not, what other sustainable travel arrangements will be in place for pupils from the wider Martlesham area (walk, cycle, school bus etc)? If parents from outside the development all have to drive children to the school this will add to the morning peak hour load on the A12 junctions.</p> <p><u>Type of School</u> We would not like to see the provision become a political football for expensive or discredited types of school.</p>	CR
Energy Statement		Checked and noted	
Geodiversity Statement		This is a small geological SSSI but its location is not shown on the main plans; it needs to be shown. The report is comprehensive, highlighting the national importance of this SSSI and it is essential that the recommendations are fully implemented.	EO
Land Stability Report		Checked and noted	
Lighting Statement		<p>This is a brief report but its recommendations must be included in any planning permission with particular emphasis on:-</p> <ol style="list-style-type: none"> <li>1) A minimum of light spillage so that the sky can be as dark as possible.</li> <li>2) Lighting must be such that all of the natural areas have no light spillage onto them and can remain dark (this is an essential need for the various wildlife there).</li> </ol>	SI
Service Supply		<p>This document provides brief information how the various utility services may be provided. It appears that upgrades will be needed to all of them but there is no plan that shows where these upgrades may be. Of particular concern is foul water drainage which will be pumped from the site to the Woodbridge treatment plant. No route is shown but it appears that various upgrades along the existing network are proposed including several offline/emergency storage:-</p> <ol style="list-style-type: none"> <li>1) Providing storage of 352m<sup>3</sup> at Martlesham - BT. Research SP, west of the proposed development.</li> <li>2) Upsizing Martlesham - B.T. Research SP from 25l/s to 50l/s and increasing the existing emergency storage by 237m<sup>3</sup>, west of the proposed development.</li> <li>3) Providing offline storage of 781m<sup>3</sup> off Felixstowe Road at Martlesham - Hilton RD SP, north of the proposed development.</li> <li>4) Providing offline storage of 174.5m<sup>3</sup> in green area adjacent to Main Road, north of the proposed development.</li> </ol>	CR

		<p>Plans showing these proposals should have been provided as the possible location of storage tanks could create smell problems to those nearby, it is not clear where the Main Road storage tank will be and this is an entirely residential road with some existing sewage smell issues already. From Felixstowe Road pump station there is no indication (apart from the storage tank mentioned on Main Road) of what effect there will be on the sewerage system between there and the treatment plant e.g. will there be more sewer work on Lamb Barn Hill? What effect will there be on the Recreation Ground pump station and site? Will this also need upgrading and need extra sewage storage?</p> <p>The other service upgrades include new mains and substations but again they are not indicated on any plans. All of these services have the potential for temporary disruption.</p>	EO
Footpath Cycleway Bridleway Statement		<p>The many paths of the three sorts included and proposed are extensive but there is no reference to their possible use and needs of people with any disability. Surfaces of all footpaths need to be smooth so that they can be easily used by all especially wheelchair users (rough or stony surfaces can be extremely uncomfortable for the person in a wheelchair and it can be harder to push – many people who have to push a wheelchair are likely to be elderly). The bridleways, connecting as they do to further bridleways, may encourage more horse riders; again the surface needs to be sound as horses can severely damage a soft surface. Management &amp; signage etc. of these various paths needs to be such that horse riders and cyclists do not stray onto footpaths and the various open areas.</p>	SI
Footpath Cycleway Bridleway Statement		<i>Other relevant text in Key local Connection Strategy</i>	
Arboricultural Impact Assessment and Tree Survey	3.1	To clarify whether a Project Arboriculturalist will be employed to assess the ability of individual trees retained to tolerate disturbance.	CR
	3.1	To clarify whether an Arboricultural Method Statement (AMS) will be produced following planning consent to address the protection of trees issues and if so reassurances that it would form part of any planning conditions relating to trees.	CR
	3.4	To clarify whether the trees identified for removal will be considered again at the 'detailed design stage' to see if they can be incorporated into public open spaces and/or residential gardens.	CR
	3.5	<p>Spratts Plantation – We support the suggestion of a Woodland Management Plan and the need to remove the green waste that has been fly tipped.</p> <p>Support for the removal of trees growing on the Scheduled Monument in Spratt's Plantation requiring Scheduled Monument Consent and that the trees identified for removal be part of a planning condition outlining the works required.</p>	SI

	4.5	Support the need for a competent tree surgery contractor to undertake any works and ensure that 'no protected species or habitats are harmed whilst carrying out site clearance or tree surgery works'.	
Noise Appraisal		The noise data (like the transport assessment data) does not compare the present levels with the 2027 levels. All the comparative data is about 2027 levels with and without mitigation.  This a major shortcoming in our opinion.	CR
App I Noise Appraisal	Page 18	The noise levels along the A12 fall substantially at night. The Neighbourhood Plan contains the following statement: - "Lobby to ensure that noise assessments accompanying planning applications, are undertaken at night as well as during the day, particularly in relation to noisy plant." Can this be incorporated in the policies for reserved matters applications both in terms of the impact on new and existing residents?  There are two other sources of noise to bear in mind: 1. The air conditioning plant at the top of the BT water tower. This generates a noticeable hum in summer which increases with ambient air temperatures as it works harder, and it stays on all night in very hot weather so as to meet the target temperature for start of work in the morning. The developer may wish to discuss this with BT. The local belief is that the louvres are the wrong way up so they deflect the noise downwards. It can be heard as far as the western side of Martlesham Heath. 2. There is also the moto-cross track next to the planned housing in the SW corner - this is very loud when in use although that is generally quite infrequent.	SI  SI
App I Noise Appraisal	P17 Fig 9a	The 5m barrier comprises a bund plus a barrier (form not yet specified). The type of barrier should be selected to absorb or diffuse sound waves, and not reflect them towards the existing housing.	SI
App I Noise Appraisal	App B Contours	The >65db band (red) alongside the A12 in Map 1 (day time 2017) is noticeably wider on both sides off the A12 than it is in Map 3 (2027 with development). It is not clear what measures have been assumed to produce this apparent improvement by 2027 – e.g. speed limit reduction, road surface quietening etc.	CR
Environmental Statement Vol 1	Para 4.8.1 Noise	One of the most effective mitigation measures would be to reduce road surface noise at source on the A12 by using a quiet road surface. This is a very busy section of road.	SI
Environmental Statement Vol 1	Section 6 Air Quality	Comparison between table 6.13 (showing data from DEFRA maps 2015) and the later tables showing 2027 estimates, reveals a significant increase in NO2 levels, especially R6 – R9. Also 2015 and 2027 PM2.5 levels are already above WHO guidelines (10 µg m-3) and incidentally approaching Scotland's current objectives level (12 µg m-3). There is no certainty that the Assessment Levels in Appendix C3 (ie PM2.5 is 25 µg	CR



		<p>m-3) will be considered safe by 2027, and we have no confidence that there would be any “weapons in the locker” to reduce these levels if this proved necessary to meet future targets.</p> <p>R9 (which Martlesham PC funded for a year) has been removed and it should be reinstated to maintain monitoring at the site closest to the T junction with its stop/start traffic.</p>	SI
Environmental Statement Vol 1	Para 6.6	The current bund on the western side was put in place to contain dust and noise from quarrying activities as part of the licence. It is recommended that this is kept in place during the construction phase for as long as possible – i.e. until the removal and realignment of part of it is needed to accommodate the new entrance.	SI
Environmental Statement Vol 2	Para 12.6.36 & 12.7.3	12.6.36 Refers to a noise barrier of 5m. whereas 12.7.3 refers to a barrier of 8.5m. CEG have confirmed that the correct figure is 5m (comprising the bund and any fence along the top).	SI
Environmental Statement Vol 2	Page 11-6 Par 11.2.27 et seq	Martlesham Heath Village is largely dark between midnight and 5 am due to the SCC policy to switch off most of the street lighting . What is planned for the new site? If switch off is planned will this apply before final adoption by SCC? If not, then it could be several years before night-time switch off is implemented.	CR
Environmental Statement Vol 2	Page 13-17 Table 13.14	There are 3 GPs at Martlesham - See earlier comment against planning statement.	EO
Environmental Statement Vol 2	Page 13-19 Para 13.5.34	Suggest change first section (up to semi colon) to:- <i>Local community venues include the Martlesham Community Hall &amp; Richards Room, Martlesham Heath Pavilion (consultation responses and the Neighbourhood Plan indicate these are all well used);</i>	EO
Environmental Statement Vol 2	Page 95	<p>We have been in correspondence with CEG about building heights along the western edge - this will be the most conspicuous part for most people passing through and living nearby.</p> <p>They have commissioned an artist’s rendering for the western edge but it will take a few weeks to draw up so we reserve the right to comment at a later date when it is available.</p>	EO/ CR
Transport Assessment Part 1		<p>A general comment is that the assessment does not provide comparisons between the 2016 base line and the 2027 scenarios 4, 5, and 6. This makes it difficult to understand the real-world impact of the proposals.</p> <p>There is concern that rat running, which is already particularly affecting residents in Old Martlesham, has not been properly addressed and the plans do not include adequate mitigation.</p> <p>There is an established rat run through Gloster Road, Felixstowe Road,</p>	CR

		<p>Main Road &amp; on to Woodbridge avoiding the A12. This will be exacerbated with the access &amp; egress for the new development at Gloster Road. Effective traffic calming on Felixstowe Road is needed. There is also another rat run using the Ipswich/Newbourne/School Lane roads to Martlesham.</p> <p>Martlesham residents are already suffering from these two rat runs and it is hard to see how traffic measures proposed in the planning application will improve, if not worsen, the existing situation.</p> <p>Another general comment is that Felixstowe Road is part of the national cycle route network but increasing traffic, including a bus route, using the road is deterring cyclists. Further mitigation is needed to improve cycle safety.</p>	SI  CR  SI
Transport Assessment Part 1	P12 Fig 4g	Yellow cycle advisory round the south of Eagle Way is incorrect. There is a signed mixed on-road/mixed use cycleway route straight across the village past the N side of village centre to connect from west to east.	EO
Transport Assessment Part 1	P18 Para 5.8	Delaying the provision of the new northern access point off Gloster Road for 6 years is unacceptable; by this time about 1/3 of the development will be complete. Without it there will be no convenient pedestrian access into and out of the new development to the retail and industrial area, or access to facilities (e.g. medical) which are located on the other side of the A12 and vice versa. This is in conflict with parts of the vision on page 45 of the Design & Access statement. It also reinforces the isolation of the new development rather than its integration into the rest of the community.	SI
Transport Assessment Part 1	P18 Para 5.9	Reduction in speed limit to 50mph is strongly supported by Martlesham PC on noise and airborne pollution grounds (both were identified as significant concerns in the Neighbourhood Plan survey).	SI
Transport Assessment Part 1	Page 19 Para 5.11 on	<p>Martlesham PC welcomes and supports the objectives stated, but deeply regrets that these aspirations do not extend beyond the site into the wider local area. MPC (supported by Neighbourhood Plan evidence) has been arguing for some time that the retail area is impossible to get into and get around safely on foot and by bike and this needs to be rectified both on sustainability grounds and to reduce load on the already congested local road network. This will contribute towards meeting the objective in para 6.5 re promotion of walking and cycling and the Vision statement on page 45 of the D &amp; A statement.</p> <p>Some s106 money for this purpose could be used to rectify this deficiency. SCDC have told us that planning laws have prevented recent retail developments from funding the rectification of existing problems so this may be the only opportunity to solve this growing problem.</p>	SI  EO

Transport Assessment Part 1	Page 21 et seq	MPC and the Neighbourhood Plan has identified a need for “white van” parking. The high density of modern housing coupled with growth in the number of self-employed van users (plus employees required to house a van at home) means the problem is worsening. The recent development at Mill Heath opposite the Black Tiles pub is a case in point. The “statement entrance” regularly has several vans parked there overnight (or on Main Rd) due to the lack of space and proper provision within the development. Consideration needs to be given as to where these types of vehicles can be conveniently parked to avoid congestion and friction between neighbours. The government emphasises the economic contribution of the self-employed but planning policy does not always support it as well as it could.	SI
Transport Assessment Part 1		<p>1. There is no Opticians at the Martlesham Tesco.</p> <p>2. Fig 6c shows that the measurements in Fig 6a are taken from the western end of the proposed northern access road but this point is approx 0.8km from the nearest housing in the new development and 1.2km from the Community Centre. A more relevant measurement would be from the new community centre which shows the distances in 6a to be -</p> <p>Martlesham Heath Newsagent/PO, Surgery, Pharmacy and Dental practice - all approx 1.7km. (not 0.75km)</p> <p>Birchwood Primary School 1.9km (not 0.85km)</p> <p>Gorseland Primary School 2.5km (not 1.7km)</p> <p>The Walking and Cycling Isochrones would be more realistic if they were centred on (e.g.) the new community centre. The current isochrone centre is, in practice, pretty meaningless.</p>	EO
Transport Assessment Part 1	Page 31 Para 8.21	The scope of improvements identified for the A12/Anson Rd roundabout does not extend east to the pinch point created by the Tesco mini roundabout and the single lane approach from there to the main A12 roundabout. This is a particular problem in the weekday pm peak period as it forms a key exit point from the retail and industrial parks onto the A12. It is this congestion which forces traffic to go northbound up the Old Felixstowe Road which is narrow and forms part of a Cycle Route. The congestion is often worse at weekends with large volumes of shoppers and it’s not clear if the model takes account of weekend activity. It should be noted that the delays arising in that area do not just affect the modelled routes but also queuing traffic building up in Beardmore Park itself on the highway and in the car parks. Reports on Streetlife mention long delays to get out of Beardmore car park (30 mins has been cited). Four more bulk goods units have consent on two sites in the immediate area. This will make the problem worse.	SI
Transport Assessment Part 1	Page 31 Para 8.21	It is noted that the Adastral Park north gate currently used by BT people will no longer be available to them. This gate was built to ease congestion both within the BT site, and at the main BT A12 roundabout by sending some traffic north on Gloster Rd to access the A12 at the Tesco roundabout. Has the traffic study taken into account the removal of that entrance?	EO

Transport Assessment Part 1	Page 31 Para 8.21	<p>Complete blockage of northbound traffic on the A12 south of the A1214 is increasingly common as traffic volumes have increased. If an incident occurs queues can quickly stretch down to the Foxhall Rd.</p> <p>Two lanes of queuing traffic on the roundabouts makes ingress and egress to Martlesham Heath village near impossible due to drivers' impatience and unwillingness to let people through. This could have serious consequences in an emergency.</p> <p>Is there any form of yellow hatched markings which would help to keep the ingress and egress sectors on the roundabouts clear of queueing cars?</p>	SI
Transport Assessment Part 1	Page 31 to page 51	<p>This is the core of the Transport Assessment and assesses the impact of the junction proposals in terms of trip numbers, journey times, link flows, and queuing. Some of it is understandable to the lay person and some is not.</p> <p>We would like to take up the offer from CEG for Brookbanks to give us a presentation on the data and conclusions drawn, also the model's sensitivity to variation between forecast volumes and actual outcome.</p> <p>The model stops at 2027 - we would like to understand how near maximum capacity the network will be at that date.</p> <p>This could help to inform any decisions about the timing of the northern bypass construction.</p>	CR  SI
Transport Assessment Part 1	Page 31.Para 8.22	<p>Scenario 6 assumes a reduction in speed limit on the A12, but there is some inconsistency between the information. The Network diagram for the new main entrance shows the 50mph being only on the approach to those traffic lights, but some of the other information suggests otherwise. CEG have confirmed that the 50mph limit extends from the A1214 junction to a small distance south of the Foxhall Rd junction.</p> <p>We strongly support a 50 mph speed limit though the middle of the parish on the grounds of safety at the junctions, reduced noise and reduced airborne pollution from exhaust, tyre and brake dust.</p>	CR  SI
Transport Assessment Part 1	Page 35 Fig 10c Link performance	<p>There are some significant differences between the performance of some links with and without the mitigation measures, e.g. link 2 and link 6. In relation to link 6 for example it is difficult to understand how Scenario 5 produces the improvement shown as none of the mitigation measures seem to address this. We would like to understand how the load on that link in scenario 6 compares with current levels. That link as it stands is unsuitable for more traffic especially HGVs, due to its narrowness, the cycle route along it, awkward junctions at both ends and narrowing due to poor maintenance of encroaching banks on the west side near the Crown Point end.</p>	CR

Transport Assessment Part 1	App D Item 1	The removal of the lay-bys is welcome and strongly supported. Their location in an urban housing area would be highly inappropriate. The one on the northbound carriageway in particular has in more recent years created significant problems (e.g. overnight engine noise from parked up lorries affecting sleep, trespass, littering, lavatory related activities and waste, and fence damage) for the residents whose gardens abut the lay-by. Residents have resorted to trying to clear it up themselves and erecting signs asking that the bins be used, but without much success. White vans depositing trade waste in the bins have been observed, this may be related to its proximity to the recycling centre.	CR
Travel Plan Framework		Noted. We welcome the aim to shift away from the use of the private car to walking, cycling, car-sharing and using public transport. We support the establishment of a Steering Group led by a Travel Plan Co-ordinator who will be employed by the developer for 10 years. For the aims of the TPF to be successful it is vital that connectivity with surrounding areas is in place at an early stage. It is also vital that public transport is frequent enough to make it attractive to use, e.g. buses need to link with key rail connections in Ipswich & Woodbridge. Residents will not use public transport if they anticipate long waits and high costs. Is there evidence that the proposed TPF has been tried & tested and proved successful elsewhere?	CR
Non-Technical Summary	Para 2.8.1	This says noise levels from the A12 are high during the night - but this is not the case- it is pretty quiet from about 8pm to 6am.	EO
Non-Technical Summary	Para 5.3.2	Sites designated for their importance for nature conservation. No mention of Martlesham Heath SSSI but it is picked up in a later document that states that mitigation, compensation and enhancement will be undertaken. We are having difficulty finding this document.	CR
Non-Technical Summary	Para 8.4	Mitigation - Says that if no mitigation measures are incorporated the development could potentially result in increased adverse visual effects upon residents at Martlesham Heath, users of Adastral Park, Moon and Sixpence, Seven Acre Business Park , Brightwell barns and Waldringfield golf course. Mitigations proposed are woodland planting, hedgerows, heathland and grassland.  Because of the sandy soil and being in the driest part of the Country, reasonably mature high quality plants and a watering and care regime is essential for growth and survival.	SI
Non-Technical Summary	Chapter 9	Noise: Only seems to mention construction noise mitigations. Transport: Only the effect of construction traffic is considered.	EO?
Community Buildings?		At meetings with CEG they mentioned a programme to facilitate this. We are not sure what it means in practice but it is missing from the documents. Need for indoor sports facilities, opportunity for joint community/educational provision.	EO EO

Open spaces & recreational footpaths?		SP20 and the "original" BT planning application Section 106 agreement referred to wardening and monitoring to minimise adverse ecological affects. This does not appear in the revised 106 headings, the ecological management plan, the environmental management plan during operation or the summary of environmental commitments. This should be a requirement to manage the environment and access to the country side.	EO
Sheltered accommodation		Sheltered accommodation/special needs housing (or however properly defined) does not feature in the plan. It should be provided near the centre, possibly sharing facilities like kitchens with the school and facilitating integrating older and younger residents.	EO/ SI
Surface water drainage		There appears to be no details as to how this will be addressed?	EO/ CR
Leasehold Ground rent		There is a lot of concern (and action taken by Nationwide) about high charges of ground rent on leasehold properties. This is not the same as a Service charge; the householder receives nothing in exchange for the ground rent. It is hoped if leasehold properties feature in this development that they are kept at peppercorn level.	SI
Disabled Access		A general issue is that there appears to be no reference to the needs of people with disabilities yet a significant proportion of residents will have some form of disability and they should be able to enjoy the benefits of what is being provided.	EO

**Appendices** – Comments previously sent to the Applicant

**APPENDIX 1:** Martlesham Parish Council - Development of land to the south and east of Adastral Park

Extracts of relevant material from Martlesham Neighbourhood Plan documentation.  
(Slightly amended to read as a free standing document)

**APPENDIX 2:** Neighbourhood Plan Plus (N-Plus) – issues identified for Wider Community Action and the BT (now CEG) Masterplan

**APPENDIX 3:** FEEDBACK ON DRAFT MASTERPLAN following the public consultation on 6th February 2017

Susan Robertson  
Clerk to Martlesham Parish Council  
11<sup>th</sup> May 2017

## **Outline Planning Application for up to 2000 Dwellings on land to the South & East of Adastral Park SECOND CONSULTATION RESPONSE**

*DC/17/1435/OUT – Land to the south and east of Adastral Park - 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.*

### **Introduction**

This document is Martlesham Parish Council's response to the second consultation on the application for 2000 houses and is specifically focused on the applicant's answers to our questions raised following the first consultation.

The Parish Council thanks CEG for providing answers to our questions which were phrased as Suggested Improvements (SI), Clarification Required (CR) and perceived Errors or Omissions (EO). However we were disappointed that we had to request a significant extension from SCDC to the response deadline because of the delay from CEG in providing answers.

This short response focusses on the key areas we still consider important in this application taking into account CEG's answers and further information given. **Yellow highlighting** indicates we still have concerns. **Green highlighting** shows we note CEG's comments and add our comments to reinforce and add detail.

### **Major concerns still exist:**

#### **1. THE CAPABILITY OF THE TRANSPORT INFRASTRUCTURE**

The separate BCL response has been studied and further questions asked. We have two main concerns: one the A12 and its new junctions and their capability to cope with the growth due to this development; the other the impact on the Retail and Business area. The first is being studied and modelled by SCC and one of our councillors has made a considerable effort to follow and understand this issue. We await the outcome from the various professional bodies involved in highways studies as we understand the work is still ongoing. We cannot support any single proposal until an agreed technical solution has been achieved which satisfies all professional concerns. Our concerns about rat running have not been allayed so we also make further comment on this.

#### **The A12 and its new junctions**

As roundabouts are being re-engineered the opportunity should be taken to accommodate our concerns:

- Eagle Way crossing at Manor Road

The original proposals for removal of this roundabout would have given the opportunity to make the crossing at the east end of Manor Road safer. The new scheme removes that option and we ask SCC to consider jointly with CEG how that can be achieved as part of the

roundabout re-engineering. At a minimum some form of traffic calming as it enters Eagle Way from the A12 is needed.

- Improvements at Martlesham (Tesco) roundabout

The Parish Council has received a number of complaints about this problem in the past. Also at peak times it is very common to see traffic exit Anson Rd in the left lane and then turn right up the A12, often without signalling - this makes exiting Eagle Way a risky manoeuvre at peak times.

We are still very concerned that the bottleneck going from the Tesco mini roundabout to the A12 is not being addressed. We feel strongly that the short link from the Tesco roundabout to the A12 should be considered as part of the overall A12 junction at that point for planning improvements.

- Issues with A1214/A12 (Park & Ride) roundabout

This includes difficulties going towards Ipswich from "Main Road" and regular incidents at the junction are worsened by Latitude and Suffolk Show traffic etc, and will be made worse with traffic from the new development.

- Problems with ingress & egress from Martlesham Heath

We proposed the provision of hatching on the Martlesham and BT roundabouts to ease the problem of getting out of or into Martlesham Heath when continuous queues form on those junctions (as has happened due to incidents or unusual traffic situations such as the Suffolk Show or Latitudes). Please reconsider our suggestion in conjunction with SCC - it would be simple to do as part of the initial re-engineering and avoid further disruption at a later date.

### The impact on the Retail and Business area

This is largely being ignored as being a pre-existing situation which is not helpful. This development will definitely increase traffic problems in this area, although the provision of cycleways and footpaths will help, the area itself is not currently designed to be cycle or pedestrian friendly. Many new residents will drive to this area on their way out or back from journeys to elsewhere, as well as using the car, for example, for a weekly shop at Tesco or for purchasing bulky goods. It is in CEG's interests to help provide a pleasant accessible shopping experience for their new residents; it will help sell houses. It is in the business and retail park owners' interests for their customers to be able to shop or use local businesses easily. It is in the long term interest of SCC Highways not to have serious congestion in this area which easily leads to A12 congestion.

Therefore MPC strongly urges that SCDC convene a meeting of all parties to discuss possible solutions. This initial meeting should be exploratory with no initial requests for funds from any parties but to enable joint ownership of the problems and to suggest a way forward.

**We reject entirely the concept that mitigation work is required on distant infrastructure while our local concerns are not being addressed.**

Any strategy must fully address the need to improve the non-vehicular connections to Betts Avenue, the Retail Park etc. and movement within the retail area. The Parish Council is very keen to cooperate with CEG and SCC by walking the routes to identify problems and possible solutions, involving local residents who previously commented on the poor pedestrian, cycle and mobility scooter access arrangements in the retail area. None of this would be expensive work; it mostly



involves better provision of dropped curbs and avoiding pedestrians having to share access with vehicles into the retail car parks.

### Other local concerns

- The Old Felixstowe Road  
The development will make the situation worse, especially with the north quadrant exit and the increased conflict between vehicles and pedestrian/cyclists using the route from Spratt's Plantation to the Community Centre and Retail Park. Therefore contribution to mitigation should be made.

We therefore request that:-

- a) SCC carries out a safety audit of Old Felixstowe Road. This needs to include an evaluation of the safety of the staggered crossroads at the top of Gloster Road. There was a fatality there several years ago and its design is ill-suited to the increase in traffic levels using that junction.
  - b) Give serious consideration to physical traffic calming measures (not speed bumps) sufficient to restore a safe cycle priority route.
- Gloster Road/Barrack Square junction  
The new development will exacerbate the current situation, especially the return to a single exit from the BT Adastral Park premises. All the afternoon peak hour traffic exiting from BT will as a result be in a single continuous stream along Barrack Square. The latest modified design of the junction will do nothing to help southbound traffic on Gloster Road filter in to Barrack Square to reach the A12. This is likely to add to the load on the only other two exits, i.e. past the Tesco mini roundabout or the Old Felixstowe Rd. Has consideration been given to creating an additional outbound lane along Barrack Square to ease the flow onto the A12? This could also enable a right turn central refuge for traffic turning right into the proposed hotel; any blockage here would quickly ripple back to the A12 in the morning peak.

## **2. THE FUTURE OF HEALTH CARE FACILITIES**

MPC has made clear its preference for extending the existing surgery to support the ageing current population and to provide service to the new residents as the development progresses. It is likely that the new residents of the development will not have the same needs or mobility issues (i.e. they will be younger), and if a "super surgery" is eventually built centrally to the new development it will be out of balance with its main user base.

We understand that there is scope to create a single enlarged facility at The Square in Martlesham Heath. As this will put the facility at the centre of its user base which includes some of Grange Farm, existing Martlesham and the new development we wish this solution to be implemented.

We are now making this same view (based on evidence from the Neighbourhood Plan) known to the Martlesham Heath Surgery.

## **3. HOUSING**

CEG's answers raised concerns about the viability of provision of 33% affordable homes (as required by SDCD and supported by MPC) and we would be disappointed if this commitment was avoided.

We are reassured by responses on maximum storey heights for areas and look forward to conditions and reserved matters decisions to honour commitments to:

- Max 2000 properties
- Primarily two storey structures
- Mix of housing types in each neighbourhood
- Sheltered accommodation
- Disabled access

#### Car Parking

- MPC is aware of SCC's recommended parking standards as we commented on the consultation leading up to their adoption. We would point out that these are merely recommendations - we know that because we have an example where SCC agreed to significantly fewer spaces for one application than the standard suggested.
- We have seen the impact of no van provision at the Bloor Homes Mill Heath site opposite the Black Tiles where vans routinely park in the "statement" entrance to the development, and along Main Road.
- White vans are likely to be more prevalent in the denser parts of the site so this is where the problems, neighbour disputes etc. are more likely to arise.
- We urge CEG to reconsider this policy - it is not set in stone and the businesses using these vans are an essential part of the modern economy & making provision for them will enhance the attractiveness of the development.

#### ENVIRONMENTAL PROTECTION

The effect of the development on noise, pollution and congestion levels must be monitored and controlled using reliable 24/7 base figures which consider all the variables. This goes beyond traffic noise, e.g. droning noises from the BT water tower will become a problem for new residents. As a start we have agreed with SCDC that a replacement diffusion tube will be located somewhere in the vicinity of the southern end of Lancaster Drive to monitor the impact of the changes to traffic flow characteristics once the new junction comes into service.

We note and are grateful for the commitments and explanations given; we expect conditions and reserved matters decisions to reflect these:

- Respect will be shown for the rural nature of the AONB and European sites and the geological SSSI, which will all be protected. We rely on SCDC policy SP20, specifically "the Council (SCDC) will require further proposals to be supported by an Appropriate Assessment to meet the requirements of the Habitats Regulations. If the results of the Appropriate Assessment show that part of the Strategy cannot be delivered without adverse impacts on designated European sites which cannot be mitigated, then the proposals will only make provision for the level and location of development for which it can be concluded

that there will be no adverse effect on the integrity of a designated European nature conservation site.”

- Early delivery of green infrastructure, SANG, open spaces, recreational routes within and beyond the site, which will be attractive to new and existing residents.  
Following a recent Waldringfield Quarry liaison meeting we are concerned that Brett’s plans to remove the concrete plant on the northern edge of the lake may not fit with the phasing plan for the SANGS area which is to be created as part of Phase 1. Brett consider it too expensive to relocate.
- The RAMS, a “Formal Responsible Management Body” for the green infrastructure and wardening.
- Arboricultural Impact Assessment and Tree Survey. The following has not specifically been included in the response
  - An arboricultural method statement will be produced
  - Spratt’s Plantation will have a Woodland Management Plan
  - Green waste from Spratt’s plantation will be removed
  - The removal of trees from the scheduled monument in Spratt’s Plantation is carried out correctly
  - That no protected species or habitats are harmed whilst carrying out site clearance or tree surgery works.

### **BUILT FACILITIES AND COMMUNITY INTEGRATION**

A major gap in provision within Martlesham is that of an indoor sports facility, we would like to see early provision of that and expect this to be an example of facilities shared between the school and the wider community.

The Parish Council would welcome the opportunity to join the working group on community cohesion.

We again note and are grateful for the commitments and explanations given. We expect conditions and reserved matters decisions to reflect these:

- Early provision of the school, which ensures spaces are kept for the growing population
- Primary lakeside site for facilities
- The play approach which will provide a variety of high standard equipment suitable for all ages
- Protection of the barrow at the Heritage Park and the interpretation policy

## PHYSICAL LINKS BETWEEN THE PROPOSED AND EXISTING SETTLEMENTS

Martlesham Parish Council will be happy to enter a dialogue with other councils to secure a safe and convenient pedestrian and cycle link to Woodbridge.

This section refers to the revised maps “Key Local Connection Strategy 1 and 2” (The Map) and the points 3e – 3m in the BCL response to issues.

- BCL 3d: We appreciate the assurances re the convenience of bus stops at the A1214/A1189 gyratory which could not be picked up from 10391-HL-27.
- BCL 3e: Even when softened with landscaping the route through the northern quadrant will remain an unsatisfactory enclosed passage through security fences. We accept this is not the developer’s responsibility but point out that this feature will make the development less desirable.

Our long term aim would be to have the security fence removed and have the businesses rely on protecting individual buildings. This would have the advantage of making the area physically more attractive for new and expanding businesses.

- BCL 3f: We note the comments.
- BCL 3g: We reinforce this point as the response is at odds with the map.

There is an existing key cycle/pedestrian route running from the stopped off Old Felixstowe Road to the south of the proposed A12 crossing (not shown on the map), into Barrack Square and through the business and retail areas to the cycle priority route on the northern stretch of Old Felixstowe road. This is not shown on the connection strategy map which shows only a 2m potential footway along this stretch, not the 3m shared route in the response. Residents of the new development will find this route convenient for access to destinations to the north and south. This route needs to be shown and secured as a cycle way and planned as a whole with appropriate and coherent separation, safety and signalling provision.

- BCL 3h: Our comments are acknowledged but not accepted. We therefore rely on the map to indicate our concerns have been dealt with, assuming this will be provided with a firm all-weather surface capable of withstanding damage from horses’ hooves.
- BCL 3i: Our concerns regarding movements to the north and west of the site for access to open green space have not been addressed and therefore still stand.
- BCL 3j: In the light of no equestrian traffic we would be content for this to become an installation which included facilities for pedestrians and cyclists. We reinforce our concern as it was not addressed in the response.
- Route BR6 – crossing - proposed upgrade - BR11 - BR34. This has the potential to become an important cycle/pedestrian route for new residents travelling east and west and for access from the west to employment areas and the countryside. As such it should be designed and built as a safe improved single route with a firm all weather surface capable of withstanding damage from horses’ hooves. It should also be capable of extension into Kesgrave and its proposed developments, with a safe crossing at Dobb’s Lane.

- As regards suggested changes to PROWs within the development we are content for this to happen as long as convenient routes are maintained and signposted for those passing through on longer journeys.
- It is a long standing policy that we wish to see the Deben river side footpath restored which would be an amenity for new residents as long as access was controlled by well-marked and wardened routes.

Note: The Isochrone map (fig 6c) is very unclear and we'd estimated the centre as being the west end of the north exit. Our suggestion of using the proposed community centre as the Isochrone centre was offered as being somewhere near the centre of the populated area. However if it is centred on the T junction exit then we still do not agree with the distances quoted in the table, e.g. the distance from there to the Martlesham Heath Village centre is 1.42 km by foot or bike via Barrack Square and over the footbridge (not 0.75km as you show). All other distances to the west are similarly understated.

#### Mapping issues

- Track from near Gorselands School/Control Tower (The Perimeter Track) is used and signposted as a cycle route.
- South branch of the track from the School and the Control Tower (which shows an incorrect reference to a footbridge) and the track south of Martlesham Heath Green through the Birch Woods.

Above are only examples of routes through the existing buildings and green areas. Showing them as special routes give them unjustified status, may encourage needless over use and serves no useful purpose. Therefore they should not be shown.

- Map does not show the cycle route alongside the A12 from the stopped off southern portion of Old Felixstowe Road which connects with Barrack Square.

This concludes our response to the second consultation

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Note: Mike Carpenter of CODE Development Planners raised a question on Community Buildings on page 18 of our response

'Not clear on meaning of MPC's comment noted as error. Would be grateful for confirmation'.

This was listed as an Omission rather than an error. CEG mentioned a programme to facilitate Community buildings, but there was nothing in the documents about this. Not essential as part of this response but we would like sight of any documentation when available.

Susan Robertson  
Clerk to Martlesham Parish Council  
2<sup>nd</sup> August 2017

**Martlesham Parish Council's response  
to the Revised Transport Assessment with related documents  
issued September 2017**

*DC/17/1435/OUT – Land to the south and east of Adastral Park - 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.*

The fragmented document structure and file naming on the website makes it very time-consuming to determine the contents. Also the absence of a change control list in each document makes it difficult to see the changes which had been made.

The main changes seem to be

- A number of detailed changes to some of the A12 junctions. The exit arrangements from the BT main gate towards the A12 have been improved with effectively two lanes being provided. This was a suggestion made in our previous response. In addition the signalised T-junction now shows a third left turn only lane southbound, and a third right turn only lane northbound.
- Removal of the Pegasus crossing which seems a sensible decision.
- There is a revised set of assumptions concerning traffic internal to the new site (so called 'Internalisation'), with the implication that there will be less traffic than previously forecast going into and out of the development. These changes appear to have been made based on subjectively assessed adaptations of TRICS data. Although the report does state that these adaptations have been extensively reviewed, whether these are realistic in the long-term remains to be seen. People change jobs more frequently these days and so their work travel arrangements will need to adapt to those changes.
- The submission schedule shows that three of the off-site mitigation schemes are no longer within the scope of these plans, i.e. two on Bixley Road plus the Heath Road roundabout. According to an article in the East Anglian Daily Times those schemes are now being funded from other sources. Only the A12/A14 Seven Hills junction remains as an offsite mitigation scheme. We have not been told what \$106 million this decision has freed up and why this change has been made. As the money seems to be no longer required for these schemes, can it now be used to ease the traffic situation around Martlesham, i.e. issues previously articulated by Martlesham Parish Council which will be exacerbated by the development?
- The Parish Council's main concern is that there have been no improvements put forward to deal with the congestion between the Tesco mini roundabout and the A12. In our previous response we suggested that the section including the Tesco mini roundabout and the A12 roundabout be treated as a single junction and the westbound approach to the A12 should be made into two lanes. We have had no response to this. The reason this is important to us is that it affects the level of traffic on the Old Felixstowe Road (see below) and hence the rest of 'old Martlesham'.

Route	Peak flow
6 - Newbourne Road - East of A12 Roundabout	504
7 - A12 - North of Newbourne Rd Roundabout	4404
8 - Ipswich Rd North	444
9 - Foxhall Rd East of Dobbs Ln	1749
10 - Barrack Sq - A12 Roundabout Approach	1213
13 - Gloster Road - South of Gated Access	689
16 - Anson Rd - A12 Roundabout Approach	1720
17 - Anson Rd - Tesco Roundabout Western Approach	1610
18 - Anson Rd - Tesco Roundabout Eastern Approach	827
19 - Gloster Road - South of Anson Rd	631
20 - Anson Rd- East of Felixstowe Rd	427
21 - Felixstowe Rd North of Anson Rd	642
30 - A 1214 - West of Ropes Drive (East)	859
34 - Bell Ln - South of A1214	378
37 - Foxhall Rd - East of Monument Farm Ln	1754
38 - Hall Rd - South of Foxhall Rd	42
39 - Dobbs Ln - North of Foxhall Rd	234

**Figure 11b:** Theoretical highway capacity – highest peak traffic flow reported across all modelling tests

The overall peak traffic flow impact of all the latest TA are summarised in 08-TA-Main-App-A-B-C-Part-2.pdf para 9.3 onwards.

The document states:-

*11.5 The theoretical highway capacity refers to the maximum level of traffic that can be accommodated; this being a function of the design and width of the road. Traffic flow along a link has the potential to create congestion if the theoretical highway capacity of that link is exceeded. A review of the traffic levels indicates that the predicted traffic levels do not exceed the theoretical highway capacity.*

Figure 11b (above) shows that the peak flow on the old Felixstowe Road (route 21) reported in the modelling test is 642 vehicles. (For comparison the figure for Gloster Road is 631, and the A1214 west of Ropes Drive is 859.) This suggests that the Old Felixstowe Road is going to be a much busier road than at present - can the present day figures for these routes be made available to us please for comparison?

Is SCC Highways content to apparently plan on the basis that the Old Felixstowe Road be used as a major route out of the industrial and retail areas? Does the assessment of its theoretical capacity take into account its narrowness, especially at the northern end? It is the only cycle route northwards for BT and other local employees to get to and from work. If the intention is to encourage sustainable transport then this road needs to be managed properly and made much safer for cyclists including improved lighting and the cycle lane widths restored to the recommended standards for its whole length.

There is no doubt in our mind that the bottleneck of the single lane from the Tesco to the A12 roundabout is a major factor influencing drivers to use the old Felixstowe Road in the evening peak periods. Simple observations show that drivers observe the tail back and divert up the

Old Felixstowe Rd. We see no reason why some section 106 money should not be used to fix this problem using a solution analogous to that now planned for the BT A12 exit.

### **ROUNABOUT APPROACH SPEEDS**

The approach speed limits of 50mph seem fast for these busy multi-lane complex roundabouts. Bearing in mind that for many drivers 50 = 60.

The DESIGN MANUAL FOR ROADS AND BRIDGES, VOLUME 6 ROAD GEOMETRY, SECTION 2 JUNCTIONS, PART 3 TD 16/07 contains table 6/ 1 which shows that the highest speed limit within 100 m of the entry to roundabouts on a dual carriageway should be no more than 40mph.

At 50 mph, quite apart from increasing the risk of accidents, it reduces the opportunity for joining traffic to interleave with circulating traffic. This will be particularly relevant at the BT and Tesco A12 roundabouts where we see a continuous stream blocking access onto the roundabout from other routes.

### **SPEED MANAGEMENT**

We note from the Brookbanks covering letter of 18th September that all references to speed management and speed reduction have been removed from the TA and associated drawings. Please can you clarify the implications of this; i.e. does this mean that it is no longer the intention to have a 50 mile per hour limit on the section from Foxhall Road to the A1214, or is this a reaction to the government's emerging policy concerning speed bumps etc. and their impact on pollution? Having said that, there is reference in the safety audit to traffic calming being needed along the northern quadrant access road; is there some inconsistency here?

In addition the safety audit response from BCL in respect of the problem of excessive speeds on the approach to the signalised T-junction says:-

*The Stopping Sight Distance for the signalised crossing will achieve the required distances for the existing speed limit as specified in TD 9/93 Table 3. Advance warning sign provision to further enhance this will be discussed at detailed design stage."*

We cannot find Table 3. However, please confirm that there is no intention to back track on the previous proposal to have a 50 mph limit from the A1214 to the Foxhall Road junction. Quite apart from the safety aspects, the road design must take account of the health and amenity impact on residents on both sides of the A12. The distance from the BT roundabout to the proposed T junction is less than 800m and from the T junction to the Foxhall Road it is about 500m. The implications of permitting traffic to accelerate to up to 70mph and brake again in only a short distance will be significant in terms of noise, engine emissions and brake and tyre dust.

BCL's comment only seems to approach the question from a narrow physical design standpoint and ignore both the environmental impact and the impact on traffic capacity (i.e. a steady flow of slower traffic is likely more efficient in terms of capacity in this type of situation).

### **POOR DESIGN AT JUNCTIONS**

We support the comments of David Beaumont regarding lane signage on the ground at the roundabouts. There is an absence of 'right turn' lane signage on the approaches which could easily lead to confusion and sudden lane changes once vehicles have entered the roundabout.



The Parish Council considers that little has been done to address its previous concerns and these still stand. It is important for the well-being of Suffolk Coastal's inhabitants and its economy that a safe, well-designed road infrastructure is delivered as part of the Adastral Park development so that regular congestion and increased traffic incidents do not become part of the daily routine.

Susan Robertson  
Clerk to Martlesham Parish Council  
13<sup>th</sup> October 2017

**Martlesham Parish Council's response  
to the Revised Transport Assessment version 6  
issued 30<sup>th</sup> November 2017**

*DC/17/1435/OUT – Land to the south and east of Adastral Park - 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.*

**Brief background**

We last commented on V5 which has since been updated to V6 principally in response to various discussions/correspondence between Suffolk County Council and CEG/Brookbanks.

SCC had a number of concerns:

- Speed on approach to and through the roundabouts.
- Queries on the assumptions made about internalisation i.e. journeys that start and end within the development rather than going out to the external road network. They felt that the developers have been too optimistic in the assessment.
- Design of the A12 approaches to the Gloster Road, Anson Road and Foxhall Road roundabouts.
- That no part of the development should start until the new T-junction has been completed.
- The pedestrian crossing at that junction will not be provided unless it can be demonstrated that approach speeds can be reduced to appropriate levels on safety grounds.
- That the northern quadrant access route should not be commenced until all the engineering works have been completed on the A12/BT/Barrack Square junction.
- SCC put forward a number of other conditions severely restricting scale of development until various other works have been completed, e.g. no more than 100 dwellings be occupied until the changes to the Seven Hills roundabout have been implemented.
- SCC also expressed concerns about negative impacts on journeys starting in some specific parts of the model network, e.g. Eagle Way onto the A12 at the BT roundabout, Crown Point on Main Road, Black Tiles Lane, Betts Avenue.

SCC concluded that if their response was to be based solely on V5 that they would have no alternative other than to recommend refusal.

The discussions mentioned above have led to a proposal for full time partial traffic lights being provided at the Foxhall, BT and Tesco roundabouts only on the entries from the A12 (i.e. no traffic lights for the minor arms). The proposals are shown in the version six of the transport assessment. The publicly available correspondence suggests that SCC and CEG have different views on this subject - and the partial traffic lights on the existing roundabouts look like a compromise. Therefore as things stand we expect further modification to this design and would expect further consultation as it evolves.

Against this background the response from Martlesham Parish Council is as follows.

### **A12 calming and partial traffic lights on Foxhall Road, BT and Tesco roundabouts.**

MPC welcomes the objective to calm traffic and increase safety on the A12 through the residential area including on the roundabouts, and the principle behind the latest proposals which should allow greater certainty of exit times from the minor arms.

However there appear to be dangers arising from a design which has lights controlling entry from the main arms, but not from the side arms.

For example, A12 drivers in the outside lane jumping the lights colliding with drivers emerging from the side arm having seen the nearside lane traffic stop.

In another scenario, if traffic from Martlesham Heath emerges to go straight across because there is a gap in the northbound traffic even though the northbound lights are green, will that emerging traffic be held at the southbound lights, and if so is there a risk of conflict on the roundabout as the northbound traffic comes through, especially with those turning right.

If such traffic is not held on the roundabout by southbound lights then it will come into conflict with southbound traffic entering the roundabouts which will be driving at speed under the assumption that the green light guarantees the roundabout will be clear.

Provision should be made for vehicle sensors on the approaches from the minor arms so that the lights do not go red if there is no traffic waiting in the side arm. These should also include length and duration of queue measurement so that the traffic light stop phase can be varied according to queue length and duration of wait in the minor arms.

We are conscious of the problems which arose on the A1214 with signalisation of a roundabout, and we would like to see conclusive modelling evidence as to how these proposals will actually work in reality. It is important to get them right first time as the cost and disruption of reworking the junctions will be very significant.

If it is decided not to go ahead with traffic lights then we reiterate our previous suggestion that yellow hatched keep clear areas are provided to facilitate exit from side arms when traffic is queued on the roundabouts.

It is vital that there is ongoing measurement of air quality alongside the A12 from the Foxhall to the A1214 roundabout if traffic lights are to be introduced so that the impact of stop/start traffic can be assessed and remedial action taken where necessary.

Has the option of full traffic lights on all arms which work only part-time been considered?

### **SCC's comments (Luke Barber to SCDC on 30 October 2017)**

In general we share the concerns expressed by SCC (email plus attachments Luke Barber to Ben Woolnough on 30 October 2017) and agree with the draft conditions proposed therein.

### **Journey Times and Queuing**

The table below is from the SCC Document (p7) and shows that the independent review of the traffic modelling has highlighted some significant areas of poor performance, specifically in terms of additional average delay, see table below showing the worst affected.

*For example, traffic starting in the zone represented by 'Black Tiles Lane' (Main Road, Martlesham) has an additional average delay of 568 seconds (nearly 10 minutes) compared*

**Table 8 - Travel Time per Vehicle by Origin, AM Peak Hour – Seconds Per Vehicle**

Zone	Description	2027 DS	2027 DSS	2027 OTP
32	Black Tiles Lane	346	489	568
39	Development Site	391	389	450
11	Ropes Drive Western Access	184	105	380
31	Access East of Felixstowe Road	223	292	369
38	Development Site South of Main Road	158	260	322
25	Brightwell Road, south of Newbourne Rd	-70	-143	144
4	Main Road, North of Felixstowe Road	70	106	142
22	Eagle Way, West of Barrack Square Roundabout	85	99	142
19	Betts Avenue	75	96	140

*to the current base year, for the journey time to exit the modelled area.*

32, 31, 38, 4 are all in the old Martlesham area. Whether this results from exacerbated problems getting out onto the A12, or from generally increased congestion in old Martlesham as a result of more traffic routing through there, is not clear, but it adds to our previously expressed concerns regarding increased traffic on the old Felixstowe Road and through old Martlesham itself (see later).

(22 is the exit from Eagle Way onto the BT roundabout)

The incremental journey times above are unacceptable and we would wish to see positive proposals to reduce this problem.

#### **Updated Transport Assessment V6 22 Nov 2017 Doc ref 10391TA01**

##### **para 11.5 Link Assessments Fig 11b.**

In our previous response we commented on line 21 (Felixstowe (FX) Rd north of Anson Rd) and said the peak flow capacity was unrealistic when compared with the data shown for Gloster Rd or the A1214.

We note that line 21 (old Felixstowe Rd) has been removed in V6 - why is this? The problems created by increasing volumes of traffic are getting worse as the retail park continues to grow, and will continue to worsen as the development gets under way. Why has it been removed?

At our recent meeting with SCC, SCDC and Brookbanks we raised the problems with this link (and the increasing traffic volumes in old Martlesham which result from this) and we still feel strongly that it needs to be addressed. Table 11a line 19 shows 85% increase in pm traffic volumes on Gloster Rd south of Anson Rd. Our view is that this will encourage traffic towards the Tesco A12 Junction and the old FX Rd. Overall we are very sceptical about the figures for the latter shown in line 21 of Fig 11a. We would still very much like to know how these compare with the 2016 base figures.

Our previous suggestion to dual the westbound part of Anson Road to speed up flow out on to the A12 still stands.

The Parish Council has also an agreed proposition to seek traffic calming on the old FX road to return it to its post Martlesham bypass condition as a quiet, safe cycle priority route. Possibilities for traffic calming could include a 20mph limit, one-way passing points, no HGVs etc. A scheme has not yet been defined and we would need advice from SCC Highways.

If it is the intention behind the current assessment that the old FX road becomes a key route into and out of the industrial and retail area then this needs to be made explicitly public so that residents can be consulted about this rather than it being buried in a technical Transport Assessment.

### **Toucan Crossing at T junction**

Moving the Toucan crossing to the north of the junction means users will need to go the long way round to reach the bridleway. Are measures (e.g. barriers) needed to stop pedestrians trying to take a short cut by "nipping" across the A12 on the south side of the junction?

### **Technical Note Traffic sensitivity test 23th Nov 2017**

**In section 4 (journey times)** it is noted that Fig 4a, line 6, shows scenario 2 pm southbound figure of 2797 seconds (i.e. 47 minutes). This makes no sense, as traffic would be queued back onto Main Rd so the amount entering would be self-limiting. In any case in the pm most traffic is northbound as people leave work, so this looks a very curious figure.

Fig 4c, line 6, shows a 95% reduction in flow pm southbound. We fail to understand the basis for this figure since the pm flow is mostly going north away from the business park.

### **Junction queues Fig 5a**

Line 3 Eagle Way - this shows a reduction of 58 in queue length - this implies a reference case queue length of unprecedented size at this entry arm.

We would welcome explanations of the above errors/anomalies as they call into question the validity of the tests.

### **In summary**

Martlesham Parish Council has not opposed the development proposals from CEG until now. However we feel that until the following issues are addressed it is the council's view that it should not be approved:

- 1) Safe, efficient, validated designs for the Foxhall Road, BT and Tesco roundabouts.
- 2) A solution to the increasing volumes of traffic on the old Felixstowe Road.
- 3) Measures to address the levels of journey delay in the old Martlesham area as identified in Table 8, as referenced earlier in this response.

Susan Robertson  
Clerk to Martlesham Parish Council  
19<sup>th</sup> December 2017

**Appendix 6.**  
**Waldringfield Parish Council Consultation Responses**  
May, July, September and December 2017



# Waldringfield Parish Council

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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.



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## Outline planning application for up to 2000 dwellings on land to the south and east of Adastral Park - June 2017 update

### Re-consultation Response by Waldringfield Parish Council

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** as an update to our previous consultation response submitted in May 2017. The paragraph numbers and text in dark red refer to the previous consultation response. CEG's response texts in blue refer to the *PC Consultation Schedule Revision A*<sup>1</sup>, and WPC's latest responses to these are in black.

**Paras 1-4:** The two access points onto the Ipswich Rd are described as 'primary'.

CEG's response: Applicant agrees. The proposal already confirms the intention to provide the primary accesses to the site via the A12 and Gloster Road. The term 'priority' relates to the design of the junction as a give way arrangement

WPC thanks CEG for this clarification.

**Para 13:** Downgrade 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.

CEG's response: Applicant prepared to discuss with WPC, SCDC and SCC the options to design appropriate traffic calming and traffic prevention measures at this junction.

Following the WPC, SCDC and CEG meeting on 5<sup>th</sup> July 2017 (5<sup>th</sup> July meeting), CEG has since made a commitment to downgrade this road as stated in the document *PC Consultation Schedule Revision B* which now says "Applicant commits to 'design the western Ipswich Road access to minimise its use by motor vehicles

<sup>1</sup> <http://www.eastsuffolk.gov.uk/assets/Planning/Adastral-Park/Addition-supporting-information-and-amendments-June-2017/23-Parish-Council-Consultation-Response-Table-RevA.pdf>

and to discuss at reserved matters stage with WPC, SCDC and SCC the options to design appropriate traffic calming and traffic prevention measures to be incorporated into the scheme in this location".

WPC welcomes this amendment, but is concerned that the *PC Consultation Schedule Revision B* document is not currently included in the application documents. We seek assurance that the *PC Consultation Schedule Revision B* document replaces the previous iteration, *Revision A*.

**Paras 5-8 & 10-13:** The new junction on the A12, linking to the main boulevard, should be functioning before construction on the development begins.

CEG's response: Applicants prepared to include in the phasing programme to be secured through condition or planning obligation, the delivery of the A12 access and boulevard to the school site in phase 1 of the development. The Ipswich Road accesses will still be required but the majority of traffic would be expected to use the primary junction to the A12.

WPC is pleased about that and looks forward to SCDC imposing such a condition.

**Para 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

No response from CEG in the *PC Consultation Schedule* or elsewhere in the June update, however at the meeting on 5<sup>th</sup> July 2017 WPC was told that the earth moving work will start "sometime in 2018" and Bretts will finish by December 2019. WPC thanks CEG for this clarification, but is concerned that both construction vehicles and Bretts' extraction vehicles will be using Ipswich Rd for a period of more than 12 months.

**Paras 16-19:** Further work [on the Foxhall Rd roundabout] is required by the applicant to provide appropriate mitigation...

CEG's response: Application acknowledges that there will be an increase in traffic generated by the proposals. The application includes an extensive package of transport improvements ...

The changes to the Foxhall Rd roundabout are minimal, but WPC accepts that the new traffic-lighted 'T' junction on the A12 to the north, now to be delivered in Phase 1, will interrupt the flow of traffic entering the roundabout from the north, thus making it easier for traffic from the Ipswich Rd to enter the roundabout. This goes some way towards alleviating the problem, although we still anticipate congestion here, and elsewhere on the A12, getting worse.

The A12 is the only major route northwards through Suffolk to Lowestoft and Yarmouth, and, largely because to this development, will be turned into little more than an urban thoroughfare. The development makes the need for a northern bypass around Ipswich even more pressing. WPC urges SCDC and SCC to take a more holistic and long term view of their road strategy, instead of allowing large developments such as this, and then applying sticking plaster solutions to fix the congestion problems those developments create. Throughout the process of producing the Core Strategy WPC consistently argued that smaller, distributed developments would have less of an impact on the road system, and it looks like the transport problems associated with this development are proving us correct.

**Para 20:** ... 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...

No response from CEG in the *PC Consultation Schedule* or elsewhere in the June updates. However, in the 5<sup>th</sup> July meeting, the aspiration to introduce speed restrictions along Ipswich Rd was again confirmed by CEG. We understand that this requires the approval of SCC and the police. WPC would be very happy to provide evidence and to take part in discussions with the appropriate bodies to help achieve this.

**Paras 30-31:** The amount of greenspace is significantly less than that presented to the Planning Inspector in the External Examination in 2012. ... 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 ... despite its obvious flaws.

CEG's response: The calculation of on site green infrastructure requirements is entirely in accordance with planning policy and advice from relevant consultees.

WPC still disagrees with the calculation and is disappointed that a satisfactory explanation of the 1.57 figure still hasn't been provided. We remain very sceptical about whether the amount of on-site green-space will provide sufficient mitigation to prevent harm to the Deben Estuary SPA. We do not accept that Natural England is correct to agree to the considerably reduced on-site green-space provision, but it is perhaps not a matter to be raised via this application consultation.

**Paras 32-40:** The depth of the buffer is clearly inadequate given the buffer will provide separation between the development and the AONB ... The photomontages of the view of the south eastern corner on completion and in year 15 ... appear to show virtually no buffering effect ... 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.

CEG's response: Applicants acknowledge the importance of protecting views from the AONB. ... The details of the planting scheme will be submitted for approval by SCDC in consultation with the AONB unit and WPC. The intention will not be to provide a solid screen to development but to create a soft transition of development into the wider landscape and reflect the settlement edge found within the Suffolk Coast and Heaths AONB.

WPC looks forward to seeing these details. We are pleased to see that the buffering in the SE corner is now shown as part of Phase 1 in the *Green Infrastructure Phasing Plan, Drawing 17*.

**Paras 42-43:** More detailed information is needed regarding tree planting, maturity of new planting etc. ... Existing trees along the perimeter, in particular along the Ipswich Rd, should be protected by conditions applied at the outline application stage ... It would be desirable to increase the depth of the buffer zone.

CEG's response: Applicants acknowledge the need to protect and maintain a suitable landscaped buffer along the Ipswich Road frontage. The detailed landscape scheme to be submitted and the scheme to be planted in phase 1 of the development will seek to maintain and manage a suitable screen to Ipswich Road in perpetuity.

At the 5<sup>th</sup> July meeting WPC was told that the reserved matters application would include the *Detailed Landscape Scheme* and that any permission for the outline application should carry this condition. We trust that SCDC will impose this condition.

**Paras 44-52:** ... the applicant fails to address the appropriate mitigation within the submitted Environmental Statement or associated documents ... there is no indication that the financial contribution will be sufficient to mitigate the impact ... Considerably more detail must be included in the outline application

CEG's response: Off-site mitigation of residual impacts will be secured through payments that are in line with the emerging Recreational Avoidance and Mitigation Strategy (RAMS). Payment of £150 per unit will be secured through the s106 agreement. It is therefore certain that the funds will be ring fenced and spent on mitigation measures whether or not the RAMS is fully adopted. It is understood that contributions will be spent on matters to include enhanced wardening and monitoring of visitor impacts upon designated European nature conservation sites.

WPC notes that the s106 agreement amounts are roughly in line with those for the BT application. At the 5<sup>th</sup> July meeting WPC was told that CEG would set out an *Environmental Action Plan*, to be phased over the lifetime of the development, and that this would be contained in a supplementary planning document. We look forward to seeing this action plan. We are pleased that the funds will be ring-fenced, but still seek assurance that the funds generated by the Adastral Park s106 will be allocated towards protecting the Deben Estuary SPA, given that this extremely large development (the largest by far in the District) is adjacent to the Deben Estuary SPA.

We are still extremely worried that the impact of an extra 4,600+ people in the area will be immense. We remain unconvinced that the mitigation proposed will be able to nullify the potentially catastrophic effect on the existing local communities and the Deben Estuary SPA.

At the very least we wish to see details of when and how the Deben Estuary SPA visitor survey, as required by SCDC's *Appropriate Assessment (Nov 2011)*, will be delivered.



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## Outline planning application for up to 2000 dwellings on land to the south and east of Adastral Park - Sept 2017 update

### Re-consultation Response by Waldringfield Parish Council

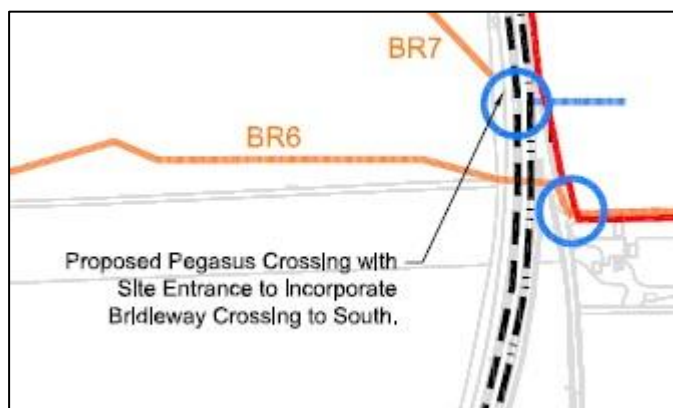
DC/17/1435/OUT | Outline planning application for up to 2000 dwellings, an employment area of c0.6ha (use Class B1), primary local centre (comprising use Classes A1, A2, A3, A4, A5, B1, C3, D1 and D2), secondary centre (comprising possible use Classes A1, A3 and A4), a school, green infrastructure (including 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** as an update to our two previous consultation responses submitted in May 2017 and June 2017.

#### Western Signalised Access off A12 ('T' Junction)

The Pegasus crossing has been removed. WPC agrees with this decision, and the reasons given for it. The statement "*The current crossing point for horses looks unused, which is probably due to the very busy A12*" is undoubtedly true. However it is still an official bridleway, and WPC urges SCDC and SCC to consider providing an alternative bridleway to allow horse riders to get from east of the A12 to the west side safely.

The drawing **10391-HL-101A**, which shows this junction as a Pegasus junction has not been updated:



New drawing **14-Drawing-10391HL07-Rev-C-Western-Signalised-Access-off-A12**. The number of lanes to turn off the A12 into Adastral Park, from both directions, has been increased. WPC agrees with this decision.



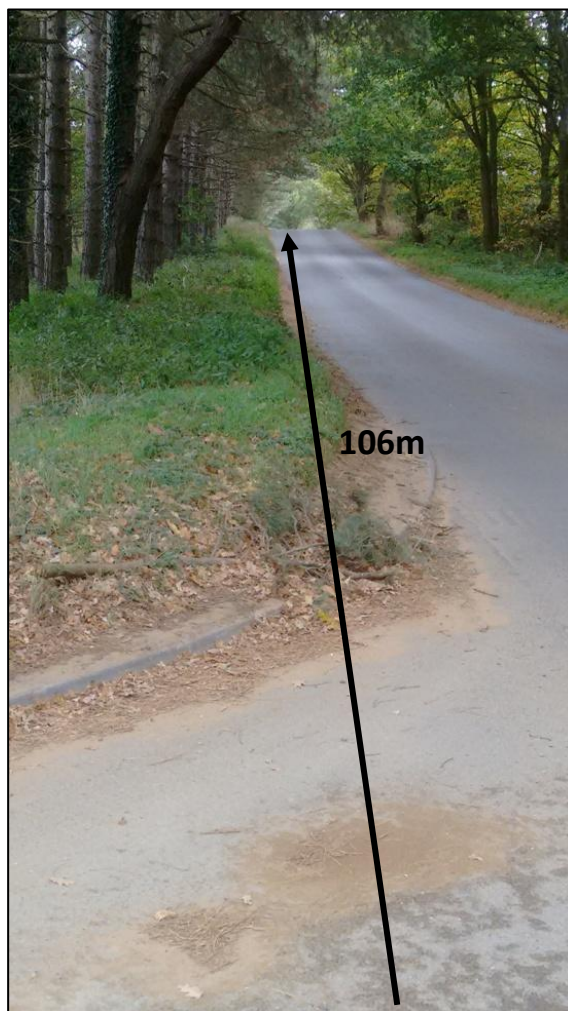
## Foxhall Road A12 Roundabout

New drawing **18-Drawing-10391HL31-Rev-A-Foxhall-Roundabout-mitigation**. The road markings have been changed on the Newbourne/Ipswich Rd approach to include a shared middle lane for going left and straight on. In the June 2017 version this was just for straight on. WPC prefers the June 2017 version, as it is simpler, and it seems inappropriate for left turners to be in the middle lane, along with those going straight on.

The same applies to the Foxhall Road approach lanes.

## Eastern Priority Junction onto Ipswich Road

Updated **11-Drawing-10391HL04-Rev-D-Priority-Junction-Eastern-Access**. The visibility splay has been increased from 120 to 215m, but the drawing seems to be otherwise unchanged. It is not entirely clear how this has been achieved. In any case, no account seems to have been taken of the topology. There is a small hill to the east of the junction, whose brow is 106 metres from the middle of the junction and approximately 1 metre higher. This surely reduces the visibility of oncoming traffic.



## Western Priority Junction onto Ipswich Road

Updated **12-Drawing-10391HL05-Rev-E-Priority-Junction-Western-Access**. The visibility splay has been increased from 120 to 215m, but the drawing seems to be otherwise unchanged. It is not entirely clear how this has been achieved.





# Waldringfield

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## Outline planning application for up to 2000 dwellings on land to the south and east of Adastral Park - Re-consultation: Revised Transport Assessment, Nov 2017

### Re-consultation Response by Waldringfield Parish Council

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 (WPC)** as an update to our three previous consultation responses submitted in May 2017, June 2017 and September 2017.

#### Phasing of Western Signalised Access off the A12 ('T' Junction)

1. In the May consultation WPC said "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" (*WPC Response, May 2017, §8*).
2. CEG responded with the statement "Applicants prepared to include in the phasing programme to be secured through condition or planning obligation, the **delivery of the A12 access and boulevard** to the school site **in phase 1 of the development**. The Ipswich Road accesses will still be required but the majority of traffic would be expected to use the primary junction to the A12." (*Parish Council consultation schedule, June 2017, p2, our emphasis*). This commitment was also repeated verbally at a formal meeting attended by representatives of the developers, WPC, SCC, SCDC and others.
3. This satisfied our concerns, but now we note that this commitment has been dropped and replaced with: "As the development quantum is increased, a further signal controlled junction on the A12 will be provided, north of the A12 / Newbourne Road junction" (*Updated Transport Assessment, Rev 6, §5.8*). It is not clear what a 'development quantum' is, but we assume it to mean that the A12 'T' junction will be provided when enough houses have been sold to justify the expenditure. There is no mention of providing it in Phase 1, let alone at the beginning of Phase 1, which is what would be required to deter residents from getting into the habit of using the Ipswich Rd junctions.
4. We find this renegeing on previous commitments deeply worrying, and urge SCDC to impose a planning condition requiring the developers to deliver the new 'T' on the A12 at the start of the development.

#### Downgrading of the Western Priority Junction onto the Ipswich Road

5. In the May consultation WPC said "... we would expect to see a robust set of conditions that ensure the applicant must downgrade ... 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” (WPC Response, May 2017, §13).

6. CEG responded to our concerns with the statement “Applicant prepared to discuss with WPC, SCDC and SCC the options to design appropriate traffic calming and traffic prevention measures at this junction.” (Parish Council consultation schedule, June 2017, p2).
7. We appreciate that the design of the internal roads can be done at a later stage as reserved matters. However, a simple statement that the Ipswich Rd Western Access road will be downgraded before the start of Phase 2 would have provided clarity, and we cannot understand why it hasn’t been included. We are worried that this downgrading will be delayed if the new A12 ‘T’ junction isn’t provided in Phase 1 (see §1-4 above). We therefore urge SCDC to impose a planning condition requiring the developers to downgrade the Ipswich Rd Western Access road before the start of Phase 2 (with the actual details to be agreed at Reserved Matters). We suggest that there is justification for securing this critical aspect of the on-site movements corridors via planning condition, to ensure that Reserved Matters adhere to the requirements for the treatment of the Ipswich Rd Western Access road.

### **Changes to the Junctions on the A12**

8. One of the main changes between Rev 5 and Rev 6 of the Transport Assessment is that traffic signals have been introduced on all the roundabouts/junctions. Whilst we acknowledge that there are differing points of view, on balance we favour the changes to the roundabouts proposed in Rev 6, i.e. the use of traffic signals. We do so on the verbal assurance that the timing of the traffic signals will be optimised to minimise delays at successive junctions, i.e. ‘smart’ phasing. We couldn’t find any reference to this in the Transport Assessment and suggest that this omission should be corrected.
9. The need to negotiate multiple traffic signals on the A12 is likely to lead to an increase in the use of the Newbourne Rd (Waldringfield Heath crossroads to Martlesham Red Lion) as a rat run. We expressed concern about this in our May Consultation Response (§26), but haven’t seen any response to this issue. We urge SCDC/SCC to address this in the Reserved Matters stage.
10. The new A12 ‘T’ Junction to allow access to and from the development is to be improved by widening the A12 northbound to allow a longer ‘turn right’ lane in order to prevent tailbacks from vehicles turning right into the development extending into the straight on traffic lanes, thereby causing a serious safety hazard. We approve of this change.

### **Summary**

11. WPC supports the design changes shown in the Transport Assessment Rev 6 but objects most strongly to any suggestion that the A12 ‘T’ Junction is not delivered at the start of the development.

**Appendix 7.**  
**Kesgrave Town Council – December Consultation response**



# Kesgrave Town Council

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15<sup>th</sup> December 2017

Suffolk Coastal Council  
East Suffolk House  
Station Road  
Melton  
Woodbridge  
Suffolk, IP12 1RT

Dear Colleagues

DC/17/1435/OUT - Land South and East of Adastral Park, Martlesham Heath - 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

At its Planning and Development Committee Meeting on the 13<sup>th</sup> December 2017, the Town Council recommended approval of the above mentioned, where voting was unanimous. This Council is aware that Martlesham Parish Council has not opposed the application because it accepts that a single allocation of 2,000 homes in this area forms part of adopted/agreed Local Plan. This Town Council would wish to support Martlesham Parish Council's major concerns, which mirror those of this Town Council, given its close proximity and use of Kesgrave's services and the shared infrastructure. These concerns relate to transport, healthcare and green infrastructure. Like Martlesham Parish Council, Kesgrave Town Council would wish to seek the best possible outcomes for existing and future residents through ongoing engagement with CEG (the developers), the LPA (Local Planning Authority – Suffolk Coastal District Council) and Suffolk County Council Highways Department. Both Martlesham Parish Council and Kesgrave Town Council are seeking long term solutions to the A12 and local route congestion, as well as assurances on healthcare and local services. The Parish Council responded to consultation on a revised Transport Assessment during October. This Council, along with Martlesham Parish Council remain concerned that not enough is being done to mitigate against the impact of the additional population and its cars on the retail/business area and Felixstowe Road, the local "rat run". This Council fully supports Martlesham Parish Council who continue to press for improvements, especially for pedestrians, cyclists and the less mobile. There are also concerns about the roundabout lane signage. With regard to the increased disturbance of the Deben Estuary SPA there are some concerns about the mitigation measures (i.e. the SANG) does not offset this. Apart from the two bird' species mentioned there are several other birds that rely on the estuary that are on either the Red or Amber lists of conservation concern (see the RSPB website for these lists). There will be disturbance to many species that live on the estuary.

This Council is aware and fully supports Martlesham Parish Council when it questions the validity of assumptions because all relevant sites have not been assessed, in particular the Martlesham Heath

SSSI and Martlesham Common Local Nature Reserve which due to their relationship to the new development are likely to be heavily impacted, without any mitigation. This Council also wishes to highlight references to open spaces to mitigate the impact of the Adastral Park development that are in Local Plan Strategic Policy SP20 – Eastern Ipswich Plan Area:

*“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;”*

This Council also questions what monitoring procedures will be put in place as the development progresses? Will the system be independent of the developer? There must be a system in place which means that if the development is deemed to be having an unacceptably harmful impact on designated sites as it progresses, then the development could be paused or halted altogether.

This Town Council noted the County Council's formal response and its concerns about the impact that the proposed development will have on the surrounding road network including Foxhall Road, Dobbs Lane and Bell Lane. It was agreed that that these matters need to be mitigated. The scheme currently proposes a speed reduction of 50 mph (miles per hour) along Foxhall Road. It was felt that this should be at least 40 mph in this area and 30 mph from the Ipswich end to Bell Lane and 40mph to the roundabout and the A12. This Council noted that the majority of Parish Councils have raised similar concerns. The Town Council is disappointed to note that air quality details have been omitted, including the data from the receptor at Bell Public Inn, Bell Lane. It was noted with concern that the traffic modelling and timings exiting from Grange Farm have been estimated from the current time of 3 minutes to 9 minutes.

This Town Council fully support the response of Martlesham Parish Council with regard to highway matters and as follows:

This Town Council is aware that the Principal Engineer of Strategic Development at Suffolk County Council (SCC) has a number of concerns:

- Speed on approach to and through the roundabouts.
- Queries on the assumptions made about internalisation i.e. journeys that start and end within the development rather than going out to the external road network. They felt that the developers have been too optimistic in the assessment.
- Design of the A12 approaches to the Gloster Road, Anson Road and Foxhall Road roundabouts.
- That no part of the development should start until the new T-junction has been completed.
- The pedestrian crossing at that junction will not be provided unless it can be demonstrated that approach speeds can be reduced to appropriate levels on safety grounds.
- That the northern quadrant access route should not be commenced until all the engineering works have been completed on the A12/BT/Barrack Square junction.
- SCC put forward a number of other conditions severely restricting scale of development until various other works have been completed, e.g. no more than 100 dwellings be occupied until the changes to the Seven Hills roundabout have been implemented.
- SCC also expressed concerns about negative impacts on journeys starting in some specific parts of the model network, e.g. Eagle Way onto the A12 at the BT roundabout, Crown Point on Main Road, Black Tiles Lane, Betts Avenue.

SCC concluded that if their response was to be based solely on V5 that they would have no alternative other than to **recommend refusal.**

Discussions seem to have taken place that resulted in a requirement for the possibility of traffic lights being provided at the Foxhall, British Telecommunications plc (BT) Openreach and Tesco roundabouts only on the entries from the A12 (i.e. no traffic lights for the side roads). The proposals are shown in the version six of the transport assessment. SCC appeared to prefer the original scheme dating from 2008 which was for fully signalised crossroads which would allow better management of traffic through the network and better access from the minor arms. It would be fair to say that SCC and CEG still has different views on this subject - and the partial traffic lights on the existing roundabouts are a compromise. Therefore, whichever solution is initially delivered must be treated as provisional and subject to alteration with experience.

Against this background suggested comments are as follows:

### **A12 calming and partial traffic lights on Foxhall Road, BT and Tesco roundabouts.**

Kesgrave Town Council, like Martlesham Parish Council welcomes and supports the objective to calm traffic and increase safety on the A12 through the residential area including on the roundabouts, and the proposals which should allow greater certainty of exit times from the minor arms.

However, there are dangers arising from a design which has lights controlling entry from the main arms, but not from the side arms. For example, A12 drivers in the outside lane jumping the lights colliding with drivers emerging from the side arm having seen the nearside lane traffic stop.

Provision should be made for vehicle sensors on the approaches from the minor arms so that the lights do not go red if there is no traffic waiting in the side arm. These should also include length of queue measurement so that the traffic light stop phase can be varied according to queue length.

If it is decided not to go ahead with traffic lights then the Town Council supports Martlesham Parish Council's view, where it reiterates its previous suggestion that yellow hatched keep clear areas are provided to facilitate the exit from side arms when traffic is queued on the roundabouts. Both Kesgrave Town Council and Martlesham Parish Council are awaiting the updated air quality assessments which both Councils hope will show a comparative impact from the increase in stop/start traffic arising from the inclusion of traffic lights.

### **SCC's comments (Principal Engineer – Strategic Development to LPA on 30 October 2017)**

In general, this Town Council, along with Martlesham Parish Council share the concerns expressed by SCC (ref WSP Report sent by the Principal Engineer – Strategic Development, SCC to the LPA on 30 October 2017) and both Councils agree with the draft conditions proposed therein.

### **Journey Times and Queuing**

This table is from the SCC Document (p7) and shows that the independent review of the traffic modeling has highlighted some significant areas of poor performance, specifically in terms of additional average delay, see table below showing the worst affected.

For example, traffic starting in the zone represented by 'Black Tiles Lane' (Main Road, Martlesham) has an additional average delay of 568 seconds (nearly 10 minutes) compared to the current base

**Table 8 - Travel Time per Vehicle by Origin, AM Peak Hour – Seconds Per Vehicle**

Zone	Description	2027 DS	2027 DSS	2027 OTP
32	Black Tiles Lane	346	489	568
39	Development Site	391	389	450
11	Ropes Drive Western Access	184	105	380
31	Access East of Felixstowe Road	223	292	369
38	Development Site South of Main Road	158	260	322
25	Brightwell Road, south of Newbourne Rd	-70	-143	144
4	Main Road, North of Felixstowe Road	70	106	142
22	Eagle Way, West of Barrack Square Roundabout	85	99	142
19	Betts Avenue	75	96	140

year, for the journey time to exit the modelled area.

32, 31, 38, 4 are all in the old Martlesham area. Whether this results from exacerbated problems getting out onto the A12, or from generally increased congestion in old Martlesham as a result of more traffic routing through there, is not clear, but it adds to our previously expressed concerns regarding increased traffic on the old Felixstowe Road (see later). (22 is the exit from Eagle Way onto the BT roundabout)

This Council, like Martlesham Parish Council wait to see what can be done to reduce the congestion in and around old Martlesham. The incremental journey times above are unacceptable.

#### **Updated Transport Assessment - V6 22nd November 2017 Doc ref 10391TA01**

para 11.5 Link Assessments Fig 11b.

In Martlesham Parish Council's previous response it commented on line 21 (Felixstowe (FX) Road north of Anson Rd) where it considered that the peak flow capacity was unrealistic when compared with the data shown for Gloster Rd or the A1214. This Town Council agree with Martlesham Parish Council's view.

**Martlesham Parish Council has noted that line 21 (old FX Rd) has been removed in V6 - why is this? This Town Council would like to know the answer too. The problems with the said road still remain and are getting worse as the retail park continues to grow. Removing it from the table does not remove the problem.**

At its recent meeting with SCC, SCDC and Brookbanks, Martlesham Parish Council raised the problems with this route (and the increasing traffic volumes in old Martlesham which result from this) and it still feel strongly that it needs to be addressed. Its suggestion to dual the westbound part of Anson Rd still stands where Martlesham Parish Council has also agreed a proposition to seek traffic calming on the old FX road to return it to its post Martlesham bypass condition as a quiet, safe cycle priority route. Kesgrave Town Council fully supports Martlesham Parish Council on this.

## **Toucan Crossing at T junction**

Martlesham Parish Council has commented that moving the Toucan crossing to the north of the junction means users will need to go the long way around to reach the bridleway. It asks are measures (e.g. barriers) needed to stop pedestrians trying to take a short cut by “nipping” across the A12 on the south side of the junction? This Town Council would like to be included in the LPA’s update to Martlesham Parish Council on this query.

## **Technical Note Traffic sensitivity test 23<sup>rd</sup> November 2017**

**In section 4 (journey times)** it is noted that Fig 4a line 6 shows scenario 2 pm southbound figure of 2797 seconds (i.e. 47 minutes). This makes no sense as traffic would be queued back onto Main Rd so the amount entering would be self-limiting.

Fig 4c line 6 shows a 95% reduction in flow pm southbound.

## **Junction queues Fig 5a**

Line 3 Eagle Way - this shows a reduction of 58 in queue length - this implies a reference case queue length of unprecedented size at this entry arm. Again, Martlesham Parish Council has asked for this to be explained in more detail. The Town Council would also welcome a response in this regard.

Please acknowledge formal receipt of this letter in due course in the normal way.

Many thanks.

Yours sincerely

A handwritten signature in black ink, appearing to read 'sgclements', written in a cursive style.

Susan Clements  
Town Clerk