### Appropriate Assessment for Core Strategy (August 2011)

#### 3814 Object

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**Respondent:** D Dale [1885]  
**Agent:** N/A

**Full Text:** I object to the proposals made in the revised AA and SA dated Aug 2011. The issues identified in previous consultation processes have not been taken seriously and are not objectively addressed in the revisions of the document. The AA still gives too much weight to outdated, irrelevant data. There is available, more recent, reliable data such as the South Sandlings Survey and the Deben Visitor Survey; both are acknowledged then ignored in drawing conclusions. The "new country park" mentioned in the docs as a "suite of mitigation measures" is a fallacy. There is no land identified, no costing and no proposal for implementation. It will never materialise. I propose that the docs are flawed and must be returned to the Cabinet for proper consultation and debate.

**Summary:** I object to the Aug issues of the AA and SA in that the conclusions drawn are based on erroneous data and proper broad public democratic consultation was not carried out.

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**Attachments:**

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I object to the proposed large development at Martlesham which will put unsustainable pressure on roads and countryside. The LDF fails to follow the good example of small developments of affordable houses shown by Kirton and Nacton.
I object to the conclusions of the revised AA and SA dated August 2011. The issues raised previously have not been addressed. Out of date or irrelevant information is still being used to make decisions. New information has been ignored. No evidence has been provided that the ‘new country park’ would actually be provided in mitigation. The LDF should be returned to the cabinet for further consideration.
I object to the findings in the revised AA and SA dated August 2011. The issues raised in my previous consultation responses have not been dealt with by the revisions in the AA and SA.

Out of date and irrelevant data have been given inappropriate weight in the revised AA. New data (South Sandlings Survey and Deben Visitor Survey) have been acknowledged but ignored in the conclusions.

A new country park is proposed as a mitigation, but no site identified or costed, so no evidence it will happen.

The LDF must be returned to the cabinet for further debate and significant changes.
The Planning Committee of Swilland and Witnesham grouped Parish Council considered the above document on the evening of Monday 10th October 2011. The Committee concluded that the Document was very thorough and was obviously the result of a great deal of assiduous and thoughtful work. They would like to thank your department for carrying out this task.

Summary:
The Planning Committee of Swilland and Witnesham grouped Parish Council considered the above document on the evening of Monday 10th October 2011. The Committee concluded that the Document was very thorough and was obviously the result of a great deal of assiduous and thoughtful work. They would like to thank your department for carrying out this task.

Attachments:
Email from Swilland and Witnesham Parish Council
At 1.1.3 it is claimed that the Council took ‘account of all the evidence’ to make its decisions on housing numbers.

This entire 10-year process has had a distinctive theme running through it: little or no account has been taken of evidence contrary to the SCDC position. To sweeping claim that ‘all the evidence’ has been used is therefore faulty.

There are numerous headings here, when there really shouldn’t be. The 4000-signature NANT petition ignored. The canvassing of views in Suffolk by leaflet that avoided the villages affected. And in 2009 locals were consulted on a LDF proposing 1050 dwellings on this rural land, containing an SSSI and adjacent to an AONB. 97% rejected the choice of site.

Housing numbers were then doubled to 2000 by Suffolk Coastal District Council after an observation by one of the 3% in favour - the developer BT’s own consultant - that the number was insufficient to provide a standalone community. This was exactly what the 97% didn’t want, favouring small developments across the region.

We have now had the SCDC Cabinet held on Thursday 17 February 2011, (I am quoting the minutes), when ‘Councillor Ball commented that she had been a member of the LDF Task Group which had chosen option 4 for 1,000 houses and noted that an Environmental Assessment for each site would have been of great assistance in the decision making process and should have been provided. Paper LDTG 10/08 had not highlighted the protected areas which had made decision making very difficult and there had been no assessment attached to the paper.

Councillor Slater, Ward Member for Yoxford, commented that he was not opposed to building houses in Suffolk Coastal and supported the pro growth agenda and flexibility in the Core Strategy. He referred to Mr Buxton’s letter, Appendix E in the Cabinet papers and the chronology document which referred to how the approved options were determined which had led to the site specific of 2,000 homes on the BT Martlesham site. The way in which this decision was arrived at was the key to all of the problems that had dogged the Core Strategy since, Appendix D referred to the analysis of the housing options (July 2008); the meetings of the LDF Task Group (option 4) and the meeting with regard to Felixstowe. The document suggested that the Town Council considered whether it was best to use a number of sites or a single site. This was inaccurate as any debate on this had been vigorously discouraged and this decision had already been made. Suddenly and arbitrarily the number of homes proposed for that single East of Ipswich development increased from 1,000 to 2,000 and Councillor Slater stated that he had asked this question many times without receiving a satisfactory explanation as to why this fundamental change was made? This had not emerged from any deliberation of the Task Group - it was delivered to the Task Group. Having raised the housing number from 1,000 to 2,000, the decision to put them all in one location had not been revisited and, had the Task Group had the opportunity to do so, it may have been a very different decision.’

This is a hugely contentious issue for SCDC to claim it is now reviewing the housing requirement for the area on “all the evidence”.

It is only fair to include the reply the councillors received: “Mr Ridley responded that the ‘blobs on maps’ meeting had been undertaken in the full knowledge of the impact on all sites and this information had been put before the Task Group which had decided on option 4. The Task Group, Cabinet and Council had all of this information which would have been taken into account by Members when making their decision.”

Summary:

SCDC has built its argument for housing numbers on a poor evidence base and councillors say it failed to put appropriate research in front of them to assist them to make a decision.

Now it believes mitigation can correct too many houses being in the wrong place, and will destroy an AONB by believing figures rather than common sense.
We strongly object to the findings in the revised AA & SA dated August 2011. Our main reasons are the lack of water for this area and the disposal of sewerage. Also the road congestion on the A12 and the minor roads.
I OBJECT to the findings in the revised AA and SA dated August 2011. I am convinced that the issues I raised concerns about in my previous consultation responses are not properly examined or taken into account by the revisions in the AA and SA.

Also, the AA still draws upon out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey whilst being acknowledged have not been properly examined and therefore their findings have been ignored in the conclusions.

The "suite of mitigation measures" relies on the establishment of a new country park. A site has neither been identified, evaluated nor examined from an economic point of view. Therefore there is no evidence that such a site will be found in the right location and be made available.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Summary: I OBJECT to the findings in the revised AA and SA dated August 2011. I am convinced that the issues I raised concerns about in my previous consultation responses are not properly examined or taken into account by the revisions in the AA and SA.

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Attachments:
Kettleburgh Parish Council reviewed the previous issue of these documents and found them to be comprehensive and fit for purpose. A review of the latest issue of them based upon how any revisions made may affect Kettleburgh has been carried out and the Parish Council's view remains the same.

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Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
The Parish Council considered the documents you had sent out for consultation at its meeting on 3 October, having previously circulated the documents to Councillors.

The Council felt unable to comment usefully on the documents owing to their technical nature and the fact that you did not indicate where changes were being proposed from the original documentation.

Summary: The Council felt unable to comment usefully on the documents owing to their technical nature and the fact that you did not indicate where changes were being proposed from the original documentation.
I OBJECT to the findings in the revised AA and SA dated August 2011.

The issues identified in my previous consultation responses have not been addressed by the revisions in the AA and SA.

The AA and SA still give inappropriate weight to out of date and inappropriate data.

New data, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions.

No changes have been made to the claims that people are unlikely to walk further than 1km or drive further than 8km, which were based on a 2005 Dorset study. The South Sandlings Survey states: "Half of all visitors arriving on foot lived within 0.42km, while half of all visitors arriving by car live more than 8km away. Just over 75% of all dog walkers lived within 10km." So why has this evidence been ignored?

Why have the criticisms and comments of Waldringfield PC, NE and others been ignored?

Given that the lack of data is acknowledged in all versions: "The evidence base for the amount of visitors to European sites is poor for a number of Europe sites, as data is very sparse" (§9.1.1), the obvious solution - to commission a proper scientific study of visitors to the areas in question (Deben Estuary, Newbourne springs, etc) has been rejected. WHY?

An important part of the "suite of mitigation measures" is a new country park. No site has been identified or costed - there is no evidence that this will materialise. In addition Suffolk County Council is withdrawing funding of country parks so who would be responsible for this country park and how would it be funded?

The LDF should be returned to the cabinet for further debate.

I OBJECT to the findings in the revised AA and SA dated August 2011.

The issues identified in my previous consultation responses have not been addressed by the revisions in the AA and SA.

The AA and SA still give inappropriate weight to out of date and inappropriate data.
This proposal is being promoted by the council despite all the objections that have been made. The Council is not listening to the objections and they have been reduced a series of specific points all of which have been used to justify the Council's position.
Dear Sir/Madam

Please see below my comments and reasons for my strong objection to the allocation of 2000 homes on the land owned by BT (and others) adjacent to Adastral Park. These are based on my opinion that the Appropriate Assessment is flawed in its methodology and illogical in the conclusions it draws.

The Habitats Directive Article 6(3), contains two important requirements: (a) that any plan or project which is likely to have a significant effect on a Special Area of Conservation must be the subject of an appropriate assessment by a competent national authority; and (b) that the authority may only approve the plan or project when it has ascertained that there will be no adverse effect on the SAC. Specifically it states:-

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

It is my opinion that the August 2011 revision of the Appropriate Assessment fails to demonstrate that the BT site allocation will not have an adverse effect on the SACs in the surrounding area for the following reasons:-

1) The previous version of the AA took into account the data contained in the survey of visitors to the Sandlings area to the NE of Woodbridge. This looked at visitor numbers from a wide area, including for example Ipswich, the IPA portion of SCDC, and the Felixstowe area, and drew conclusions about the degree of impact on that Sandlings area. However the AA went on to draw conclusions about the impact, or otherwise, of the proposed developments (including the BT site) on the SACs in the vicinity of the BT site, despite the fact that there was no data to justify this conclusion, and was based erroneous information about car parking for members of the public at the locations which would give access to the Deben SACs (the AA said there was none, whereas in fact there is at all the relevant locations).

2) The revised August version of the AA has now corrected these errors and makes reference to the small scale study carried out by NANT (which shows that there will be a risk that increased visitor numbers will have an adverse effect on the SAC). However these revisions to the document do not address the continuing fundamental issue that no substantive data is available to assess the degree of risk. Para 9.2 points to the need for further studies.

3) The previous version used the absence of car parking as part of its justification for saying there was little risk. Now that the latest document states (somewhat grudgingly) that there IS in fact car parking it cannot logically follow that the risk is now no greater than was stated in the previous version.

4) The August AA specifically says in para 7.2.6:-

"Further mitigation to reduce harm, as described in paragraphs 7.2.7 - 7.2.15 below remains to be required. A planning application Appropriate Assessment would be needed to look at site- and plan-specific issues. Natural England advised in its email of 15th February 2011 to Suffolk Coastal District that it believes 'that any adverse effects on N2K sites could be mitigated by the use of planning conditions/obligations/legal agreements (S106) to allow us to conclude no adverse effect on integrity. Suitable strategies are detailed in our letter to SCDC of 12 February 2010 which could be employed following AA at project level.'"

The AA also states in para 7.2.8

"The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites"

At the present time there is no information publicly available to demonstrate that there ARE any viable and effective mitigation solutions which are realistically deliverable in the timescale to meet the requirement set out in para 7.2.8. The amount of green space available on the BT site will be very limited for many years due to the mineral extraction programme. The only other nearby site which has been mentioned is the conversion of the Foxhall landfill site into a country park. This site has just completed a programme to line out and prepare capacity for another 300,000 cubic

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metres. However the current rate of inert landfill being deposited is some 2000 tons pa, so it clear that unless the rate of landfill is very dramatically changed it will not be available for at least a generation and probably much longer. And even when it is completed and capped off it will require several years to settle and be made safe before public access can be considered. Therefore to even suggest that this site is likely to address the area’s need for diversionary green space with the timeframe of the LDF is misleading. The final suggestion that the open space be linked to the PRoW in the area ignores the fact that most of the PRoWs in the area (and certainly those most likely to be attractive to residents on the BT site) go towards the SACs and so will serve only to increase visitors numbers. One final point on this subject is that the proposal is that use of cycles will be encouraged (with dedicated cycle storage etc). This, in turn will encourage residents to cycle down to the Deben (which is about 10 minutes away via an existing bridleway).

Given that the LDF is very site specific with respect to the BT land, and that this is already the subject of two planning applications, it must be presumed that, if the LDF is approved in its present form, the BT development will go ahead. For the Council to suggest otherwise would be startlingly disingenuous. Therefore if the AA is approved (and inter alia the LDF) it is my strong view that any mitigation measures should be firmly identified and evaluated as being effective before the LDF is approved. If the council fails to do this then there is a very real risk that building will go ahead but the mitigation measures will not materialise - either because none can be identified, or cannot be delivered within the timescales set out in para 7.2.8 of the AA.

5) If, despite all the reservations and concerns expressed above, SCDC go ahead and approve the LDF and subsequently take the BT application to planning committee, SCDC should publicly assure its residents that approval WILL NOT be given unless and until substantive and deliverable mitigation measures are identified which are a) evidence based using real visitor data and b) deliverable in the timescales set out in the AA. These are issues which should not be swept under the carpet for later assessment as by then it will be too late to reverse any consents given.

Yours faithfully

Stephen Denton

Summary: Appropriate Assessment is flawed in its methodology and illogical in the conclusions it draws.

The authority may only approve the plan or project when it has ascertained that there will be no adverse effect on the SAC.

It is my opinion that the August 2011 revision of the Appropriate Assessment fails to demonstrate that the BT site allocation will not have an adverse effect on the SACs

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Consultation Response

I have objected on two previous occasions to the LDF and the further revisions offered in the current consultation (Area Assessment and Sustainability Appraisal) go nowhere to addressing my previous concerns, ie my previous objections remain in place.

The current LDF proposals will not achieve the demographic balance required to keep the rural and coastal areas sustainable. Furthermore the proposals continue to provide a strategic roadblock to the overall access to the area by overloading the Orwell Bridge and effectively destroying a national economic infrastructure capability to the port of Felixstowe, tourism, and the business that rely on free movement of traffic in the area.

The council has not taken due account of additional information such as the South Sandling Survey and the Deben Visitor Survey in preparing the Area Assessment and has instead given undue emphasis to out of date and inappropriate data.

The suite of mitigation measures offered is not credible. Key objections to the LDF should not be evaded by introducing the concept of a new country park. Given that no site or costing have been identified this mythical device should not be given any credibility as a mitigation measure for such a sensitive area.

The revisions offered in the consultation should not be accepted and therefore returned to Cabinet for reconsideration.

END

Summary:

my previous objections remain in place.

The current LDF proposals will not achieve the demographic balance required to keep the rural and coastal areas sustainable. Furthermore the proposals continue to provide a strategic roadblock to the overall access to the area by overloading the Orwell Bridge and effectively destroying a national economic infrastructure capability to the port of Felixstowe, tourism, and the business that rely on free movement of traffic in the area.
Full Text: I OBJECT to the findings in the revised AA and SA dated August 2011
C Tunstall

Summary: I OBJECT to the findings in the revised AA and SA dated August 2011
C Tunstall

Not Specified Not Specified Not Specified Not Specified None
Dear Ms. Hanslip

LDF/SP61(005) consultation on updated sustainability appraisal and appropriate assessment documents

Thank you for the opportunity to comment on these documents.

I have no concerns or issues to raise.

regards

Sue Bull
Planning Liaison Manager
Planning & Equivalence

Summary: I have no concerns or issues to raise.
I write to object to the findings of the revised AA and SA dated August 2011, and as a local taxpayer demand that the LDF is returned to cabinet for further debate.

The revised AA and SA documents still seem to be relying on out of date and misleading data. It could also be said that the authors have used statistics to get to the answer the council has always wanted.

With the strap line 'where quality of life counts' the LDF (which still reflects BT's application or put it another way is the BT application) would be laughable if it was not so sad. I cringe to think that the council feels that it's citizens quality of life will be maintained with a country park, presumably (but not stated) on the west side of the A12 at Foxhall waste site. The council is aware that there are no funds to maintain and manage such a site even if they get developer funding to start it. It is blindingly obvious that the occupants of the new housing on the east side of the A12 would have to cross said road to get to it.

Specifically the BT application, should it be given permission, will be sold to a developer who will buy on the basis of 'planning gain.' They will return to SCDC and claim that they have overpaid for site and did not recognise the level of developer funding required for mitigation projects. The development is 'cancelled' until the council allows more homes than on the original application so that a profit can be made. With council relying on this project to deliver the homes it thinks it needs it will be forced to allow more units on the site to get 'the job done.' More people means more pressure on local resources and further deterioration in the quality of life in the district.

Your faithfully
Ian Johnson

Summary: The revised AA and SA documents still seem to be relying on out of date and misleading data. It could also be said that the authors have used statistics to get to the answer the council has always wanted.
I OBJECT to the findings in the revised AA and SA dated August 2011.
I OBJECT to the findings in the revised AA and SA dated August 2011. They seem not to have taken any account of the Government’s requirements in planning in particular. The priority for development should be previously developed land, in particular vacant and derelict sites and buildings.

The contribution to be made to cutting carbon emissions from focusing new development in locations with good public transport accessibility and/or by means other than the private car and where it can readily and viably draw its energy supply from decentralised energy supply systems based on renewable and low-carbon forms of energy supply, or where there is clear potential for this to be realised.

At the regional level, the Regional Spatial Strategy should identify broad strategic location of new housing which contributes to the achievement of sustainable development.

Where need and demand are high, it will be necessary to identify and explore a range of options for distributing housing including consideration of the role of growth areas, growth points, new free-standing settlements, major urban extensions and the managed growth of settlements in urban and rural areas and/or where necessary, review of any policy constraints.

Local Planning Authorities should, working with stakeholders, set out the criteria to be used for identifying broad locations and specific sites taking into account:

- The spatial vision for the local area (having regard to relevant documents such as the Sustainable Community Strategy) and objectives set out in the relevant Regional Spatial Strategy.
- Evidence of current and future levels of need and demand for housing as well as the availability of suitable, viable sites for housing development.
- The contribution to be made to cutting carbon emissions from focusing new development in locations with good public transport accessibility and/or by means other than the private car and where it can readily and viably draw its energy supply from decentralised energy supply systems based on renewable and low-carbon forms of energy supply, or where there is clear potential for this to be realised.
- Any physical, environmental, land ownership, land-use, investment constraints or risks associated with broad locations or specific sites, such as physical access restrictions, contamination, stability, flood risk, the need to protect natural resources eg water and biodiversity and complex land ownership issues.

Yours faithfully,

P. Brockett

Melton

Summary:  
I OBJECT to the findings in the revised AA and SA dated August 2011. They seem not to have taken any account of the Government’s requirements in planning.
### Appropriate Assessment for Core Strategy (August 2011)

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I tried to put forward my objection to the revised AA and SA plan on 12th October 2011 but was unable to find the place online to respond despite spending a significant time on the SCDC website. By the time I asked someone where I could do this and the intervening time, I now appear to have missed the deadline. The date is Friday 14th October 2011 and the time is 18.21. I hope my objection can be included despite being just over an hour and a half late. It really is odd that it was not very obvious where the public could raise their objections.

Please advise me accordingly.

I OBJECT to the findings in the revised AA and SA dated August 2011.

Fiona Hay
BROMESWELL PARISH COUNCIL

REPLY TO SCDC SUSTAINABILITY APPRAISAL and STRATEGIC ENVIRONMENTAL ASSESSMENT ("Appropriate Assessment") OF CORE STRATEGY AND DEVELOPMENT MANAGEMENT POLICIES AUGUST- OCTOBER 2011

PART ONE
MAIN RESPONSE- POINTS

* This response is produced in line with the Bromeswell Parish Plan 2010 (see the following web link: http://www.onesuffolk.co.uk/NR/rdonlyres/AF1707C5-86AE-46FA-83B9-E82C9F772E0A/0/ParishPlanPartOnecombined.pdf ) which has been approved by the residents following full consultation. It is attached at Appendix One of this response document

* THE SETTING OF THE AONB:- It is noted with strong approval that this Parish's strong focus on Environmental Protection is in line with the obligations imposed on SCDC by Central Government (given primary emphasis in the P and CP Act 2000) and by the 2001 EC Directive and Government guidance (2005) in which "Strategic Environmental Assessment" and "Sustainability Appraisal encompassing Strategic Environmental Assessment" is a primary obligation of the LPA. As will be obvious from the following paragraph and the Bromeswell Parish Plan, this parish is located within a particularly vulnerable and environmentally sensitive area but half of it has been omitted from the enhanced protection it objectively merits. The residents have consistently sought to raise this issue and to protect this location because we recognize that it merits special attention, not because it is in our back yard but because locations such as Bromeswell merit protection for its own sake and in the interest of the wider Suffolk Community.

* The objective of SEA is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development *. These are the words printed in para 2.1 of the SA. Bromeswell parish therefore expects that SCDC will apply them in locations of which Bromeswell is one ,and which is described in summary below.

* But due to a serious omission from the LDF and Sustainability Appraisal and Environmental Assessment you have, unlike other LPAs and important organizations overlooked an important category of landscape in need of protection namely the SETTING OF AN AONB (see attached Appendix Two: docs produced by the other LPAs with AONBs and the Natural England's Suffolk Coasts and Heaths Unit and demonstrate the compliant approach of other organizations ) o Bromeswell is a recognized Deben Estuary Parish, the main settlement of which is within the "Other Villages" category of the LDF Hierarchy. It is right at the Gateway to the AONB and a classic example of a location where the above omission (ie. The failure to give specific recognition to the AONB's Setting) will inevitably render very vulnerable a part of Suffolk Coastal District which is independently recognized as environmentally sensitive.

* The root of this problem is the historical choice of the A1152 as the boundary to the AONB and the fact that the parish is bisected by this road.

The point is that the countryside on BOTH SIDES of the A1152 is equally important. Indeed there is a good argument that the Bromeswell countryside outside the boundary merits more protection than that within the AONB , this is because outside the AONB in Bromeswell there is a designated SSSI, an ESA, a part of the Deben Estuary RAMSAR site ,part of the Deben Estuary SPA a Local Nature reserve managed by SWT , a designated Open Access Area which is of Classic Sandlings character ,and a Grade One Listed Church . There is also a network of Quiet Lanes designated as part of the Sandlings Cycle route which are very popular with tourists on foot, cycle or horseback and which also provide green corridors within arable farmland. These beautiful and attractive lanes provide an important environmentally friendly link between the local railway station at Melton and the AONB and its Setting . In addition to the above all of the landscape outside the AONB has been designated as being within the Deben Valley Special Landscape Area and is within Natural England's recognized Natural Character Area No. 82.

* If SCDC is genuinely aims to produce a national and EU policy-compliant Strategic Environmental Assessment as opposed to simply paying it lip service, it must be accepted that the areas such as the whole of this Deben Estuary Parish must be given the same protection from unsuitable development as does the identified AONB. In other words there must be clear, binding and unambiguous Development Management Policy giving areas like Bromeswell in the Setting of the AONB exactly the same protection as the AONB itself.

* PERMANENT CARAVAN SITES FOR TEMPORARY AGRICULTURAL WORKERS:- A second omission from the Policy and one with significant Sustainability importance, especially in Suffolk Coastal District , is the lack of any policy guidance relating to the siting and requirements for caravan sites which are used to provide accommodation for temporary Agricultural Workers such as those given detailed consideration in the High Court Case of ....,(see attached in appendix 3). This is an issue which affects districts like Suffolk Coastal , Lincolnshire and Herefordshire where the bulk vegetable producing and storage industry relies heavily on cheap short-term labor from abroad.

* There are very important Development Control issuers associated with the need to provide accommodation for these non-local people but it has been completely overlooked by SCDC in the LDF policy.

* Attached at Appendix 3 is an example of the policy of another LPA with the self same agricultural practices; this policy could be adopted by SCDC. If not why not?

* These caravan sites are a permanent feature of the SCDC countryside, and they are set to grow in number with the demands of bulk-buying of vegetables by the big supermarket chains. The sites bring with them very real "sustainability issues" including Community Cohesion, the availability of and public transport, water, sewerage and electricity supplies, access to Local services such as for medical and leisure facilities, Law and Order and road safety implications associated with the frequent use of vehicles ,of all types ,driven in the countryside on narrow winding country lanes by workers (often on foreign driving licenses with differing road safety value-systems ) and the use, by them of extremely large prairie-sized agricultural machinery.

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**4138 Comment**

1 - Introduction

1.1 - 1.5: Introduction

* All of these obvious sustainability issues have been overlooked by the LDF policy documents. BUT this is a growth area which cannot be disregarded; for example Bromeswell Parish has an Electoral Roll of 260, but an unauthorized caravan site of this type increased the population for over six months by over 30%—near 10% (6 caravans with 5 residents each). If this was a chalet holiday development it would attract significant Development Control policy but as it was in the Countryside for the farming industry there was absolutely no LPA development policy control....this is for a population increase of almost 10% for 6 months...what would be the approach for; say Woodbridge or Grundisburgh if there was a 10% increase in population for 6 or more months? This is an increase which is a foreseeable regular annual occurrence with obvious Sustainability implications but which is ignored by SCDC development Control Policy. One to which other LPAs have considered (see Appendix 3) but SCD has not.

* Please consult with Councillor Christine Block a rural District Councillor who has detailed knowledge of this particular issue.

PTO for PART TWO

**PART TWO**

**SOME SPECIFIC COMMENTS ON THE TWO DOCUMENTS (SA AND AA)**

1. SA. Page 78 DM 15 to be amended to read "..AONB, its Setting and Special Landscape Areas."

2. SA. Page 86: Glossary line two should read "AONB : Area of outstanding Natural Beauty which term is to include, by implication, the surrounding landscape forming its Setting"

3. SA. Appendices section. page 34: DM16 @(a) should be amended to read :"...building...does not intrude...particularly within an AONB, its Setting and SLA."

4. SA. Appendices section. Page 38: DM27: paragraph 3 should read "......Opportunities will also be taken to create and enhance wildlife corridors and networks to include networks of Quiet Lanes in accordance with department of Transport initiative 2004." See Appendix 4

5. The Strategic Environmental assessment aka "Appropriate Assessment" within SCDC: This document should contain an additional section. To comply with the stated obligation to focus on the need to protect, preserve and enhance the district's natural environment, this extra section should address, and redress, the omission of any specific reference to the "Setting" of the Coasts and Heaths AONB within the "plans being assessed". The new section should take as its guideline the documents in Appendix 2, in particular those produced by the Cotswold Conservation Board and the Suffolk Coasts and Heaths Unit.

* SCDC should give full and unambiguous reasons if it is decided that the above suggestions are to be disregarded as inappropriate and, by implication, contrary to the national and EC guidance referred to in the opening paragraphs to this response.

**Summary:**

This document should contain an additional section. To comply with the stated obligation to focus on the need to protect, preserve and enhance the district's natural environment, this extra section should address, and redress, the omission of any specific reference to the "Setting" of the Coasts and Heaths AONB within the "plans being assessed". SCDC should give full and unambiguous reasons if it is decided that the above suggestions are to be disregarded as inappropriate and, by implication, contrary to the national and EC guidance referred to in the opening paragraphs to this response.

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**Attachments:**

full text

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Great Bealings Parish Council have no comments to make on these documents but they are particularly anxious that SCDC should press on with the adoption of the LDF as soon as is reasonably and practicably possible. We are concerned that the Governments’ proposals to "streamline" national planning policies will only serve to undermine the carefully conceived planning frameworks that we have in Suffolk. Furthermore we can see no reasoned justification for the somewhat spurious claims being advanced that planning is preventing much-needed economic growth.

On a more local note the Parish Council have queried whether the future development of Adastral Park will have some repercussions for Great Bealings. Undoubtedly there will be an increase in traffic in the Kesgrave-Martlesham area and we are concerned that there may be some growth of "rat-running" through Boot Street? Has any attempt been made to quantify and assign this growth to the local highway network?

Summary:

Great Bealings Parish Council have no comments to make on these documents but they are particularly anxious that SCDC should press on with the adoption of the LDF as soon as is reasonably and practicably possible.....

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Waldringfield Wildlife Group's objections to the revised LDF Core Strategy area:

1. Flawed and inconsistent reasoning
2. Lack of survey of current visitor numbers and their impact on the Deben SPA
3. Failure to consider cumulative impact of development on European sites
4. Contradictory information on mitigation measures
5. A general lack of concern shown towards the environmental issues raised in each of the consultations undertaken so far.

The 41 members of Waldringfield Wildlife Group continue to be deeply concerned with SCDC's LDF/Core Strategy. Following the previous rounds of consultation and the representations from the legal firms instructed by the action group NANT, a few minor changes have been made to the Appropriate Assessment and the Sustainability Appraisal, however these documents remain flawed, with inconsistent reasoning and a stubbornness of purpose which is quite remarkable.

Considering that the documents which these revisions have been made has been 10 years in the making, it is a poor reflection of the council's abilities.

WWG feels that the sum of the impact on protected wildlife areas of the 2000+ houses in the "area east of Ipswich" plus the 1,440 homes near Felixstowe has still not been considered. The whole of the Deben Estuary, including Martlesham Creek, Kirton Creek and Falkenham marshes, are part of the SPA and as such a full survey of existing visitor patterns should be carried out. Current estimates are based on figures from a rather limited survey carried out in 2004 and the anecdotal evidence from the small number of Land Managers consulted (Table 9 5.7.1). The limited survey carried out by NANT volunteers gives an indication of the attraction of a river side setting. Natural England are even recorded in the Revised AA, stating that "any development is likely to bring additional pressures to any of the sites of European interest, however, the area near Martlesham identified as preferred option could have particularly negative impacts on the Deben Estuary SPA/SSSI". NE also expresses similar concern at the proposed development in the areas north of Candlet Road and Felixstowe town, but these comments seem to have been ignored.

Basing predicted patterns of visitor behaviour on a survey of heathland in Dorset is seriously flawed thinking, there are too many variables for scientific validity. Like should be compared with like, similar habitat, similar attractions, similar wider environment. It is nonsense to suggest that as the proposed development site in the "area east of Ipswich" is 1km away from the AONB, people will not walk to the European sites of interest (6.2.45) Natural England's national survey (5.8.9) shows 1.6km as the average distance people will walk from their homes and the NANT survey showed that people walked an average of 3.8km to reach the Deben Estuary. These figures put the European sites well within the range of "the area east of Ipswich".

Mitigation and the much mentioned "Country Park" are put forward as protections for the European sites, but there are contradictions both within the Core Strategy and within common knowledge of SCC financial position. Where is the Country Park to be? Who will pay for its development and maintenance? When will it be available? The original suggestion of the Foxhall tip site (6.5 SP20) seems highly unsuitable, will there be a ban on smoking, barbecues and fireworks because of methane, will any ponds be carefully monitored for tip leachate? Noth the "high quality provision" (7.2.9) that people are being led to expect.

It is not only increasing pressure from walkers along the river banks, with or without dogs but an increase in boating activities which will occur if there is a large increase in population. This aspect has been largely disregarded. Canoeists, dinghy sailors and rowers close into the shore disturb feeding birds. The wash from larger motorboats not only disturbs wildlife but is detrimental to the saltmarsh habitat on which so many species rely.

In conclusion, WWG wishes to propose once again that the housing provision needs to be dispersed in small developments, with the inclusion of affordable homes, in villages and towns throughout the SCDC area. This would provide a more sustainable way forward for communities and for the environment.

Summary: Waldringfield Wildlife Group's objections to the revised LDF Core Strategy area:

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Change to Plan

Are you satisfied with the change to the Plan?

Legal? Sound? Duty to Cooperate? Soundness Tests
Not Specified Not Specified Not Specified None

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Change to Plan

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Thank you for the consultation on the above. ONR notes the policy statements for SP13 & SP24 regarding constraints on development around the Sizewell Nuclear Power Station. However, ONR do not wish to make any further comment on these documents, but will expect to be consulted if and which your authority makes to changes to the Core Strategy.
Regarding the latest consultation on the LDF 'Appropriate Assessment' and 'Sustainability Appraisal', I would like to register my views that as a resident of Waldringfield Parish, tree warden appointed by the parish council and as a landscape architect who has lived and worked in this area for more than twenty years, I am totally in agreement with the points made objecting to the current documented proposals in letters sent in to you on behalf of Waldringfield Parish Council and Waldringfield Wildlife Group.
The Core Strategy was discussed at length by the Full Council on 27th July 2011. However, it seemed to me, and I only attended the afternoon session, little or no account was given to infrastructure.

Without first class schools, to educate the children, of those who are expected to be attracted to the area. How are the high tech. jobs going to be filled in the future? Build more houses and forget about the schools?

There seemed to be little or no mention of increased traffic, lack of doctors, dentists and hospital capacity to cope with the increase in population.

The Strategy seems to me, to be lacking in coherent thought about its wider impact on the community in future years.

Short term thinking for short term gain. If Waldingfield is anything to go by, then the short term view of S.C.D.C. has been to allow the stock of affordable housing in the village to be enlarged, so that they are no longer affordable for first time buyers.

Will this policy continue under the Core Strategy? Will S.C.D. C allow any of the affordable houses to be built under the Core Strategy proposals to be improved or enlarged? Making them, unaffordable to first time buyers.

Summary:

Without first class schools, to educate the children, of those who are expected to be attracted to the area. How are the high tech. jobs going to be filled in the future? Build more houses and forget about the schools?

There seemed to be little or no mention of increased traffic, lack of doctors, dentists and hospital capacity to cope with the increase in population.

The Strategy seems to me, to be lacking in coherent thought about its wider impact on the community in future years.
I am writing once more because, like many others in Martlesham and surrounding areas, I am appalled at the thought of 2,000 houses, shops, high rise flats etc being built on the country’s dwindling heathland.

I have spoken to people, who know more than I do, who say that there is not enough water in the area for such a large development. There needs to be a reservoir built to begin with.

The nearest high school is full so not only will infant, junior schools need to be built but also a new high school. Are the developers going to do this, or contribute a large amount of money towards it.

When developers built Kesgrave with many houses they only built one small school, that was not big enough, so many of the children from those homes go to Gorseland school. Now children with siblings already at Gorseland cannot go to the same school so the mother has to be in two places at the same time and miss out of one child’s activities because she is not at the same school.

Before any go ahead for housing near BT is considered, look at the future years for water, infrastructure, effect on A14, schools and work, shops etc looked at under a microscope.

Summary: I am appalled at the thought of 2,000 houses, shops, high rise flats etc being built on the country’s dwindling heathland.

There is not enough water in the area for such a large development.

The schools are full.

water, infrastructure, the effect on the A14, schools work, shops etc need to be looked at under a microscope before any housing near BT is considered.
Full Text:

While Eyke Parish Council has given serious consideration to these documents, it would like to point out that as the content is so detailed and intensive, it is difficult to do justice to it in the time frame allowed.

However, the Parish Council is pleased to see the inclusion of Development Management Policies SM12 and DM13 which have a particular relevance to this rural area.

The Parish Council also notes that The Landscape Partnership has carried out the Appropriate Assessment, and, as the Company also employed by Bentwaters Parks to undertake the latter's current planning application, is concerned that this could lead to a conflict of interest.

Summary:

The Parish Council also notes that The Landscape Partnership has carried out the Appropriate Assessment, and, as the Company also employed by Bentwaters Parks to undertake the latter's current planning application, is concerned that this could lead to a conflict of interest.
When this RCS document's central plank is a New Town, focus must be on that since any new town is not in any sense sustainable, for the following reasons:

1. All development is by definition unsustainable. The U.N. Brundtland Report stated that for development to be sustainable it must “meet the needs of the present without compromising the ability of future generations to meet their own needs.” This country is not self-sufficient over crops & food & in the financially troubled and divisive/polarised world of today, events could so easily mean we need to be. How could we if we keep building on agricultural land as Adastral New Town will be.

2. The supposition that housing is needed to meet jobs is based on a totally false premise as jobs are always an unknown quantity, now or in the future & are hypothetical until they are created and actually exist.

3. Where will the water - in this, the driest part of the country's driest region - come from to provide for & service such density of housing?

4. Surface water run-off, which can never be entirely contained in the mains drainage, will adversely affect adjoining Newbourne Springs (itself a source for the water of this whole area!) & thus the whole water course of the Mill Stream, Mill River & the designated AONB Deben Estuary (as well as the sea itself). Even if surface run-off can be contained in the main drains that, along with household waste from these thousands of homes - grey & brown - simply cannot be managed by the Martlesham Creek sewage works, which already "overflows" & pollutes the Deben Estuary.

5. There are simply not the local schools, doctor's surgeries, clinics or hospitals to cope with such a vast local population increase.

6. The local road system is totally inadequate to absorb all the additional cars 7 vehicles servicing such a concentration of additional housing. Suffolk Highways may glibly say it can, but clearly they "never get out" as everyone else knows a single small vehicle broken down on or near the Orwell Bridge brings the whole road network to a standstill. Already local people can hardly get onto the A12 Brightwell roundabout at peak times.

7. There are not the landfill sites to cope with the refuse that such concentrated housing will produce. Despite all the "PR" about recycling, it is well known that barely half actually is, & goes anyway into the earth.

9. SCDC Reviewed Core Strategy document is, particularly in relation to housing & development at Adastral Park unsustainable because it is a short term easy option decision, driven by Government financial inducements and other monetary considerations and it will backfire in the future.

10. It is unsustainable in the moral & ethical & democratic sense because it is not wanted or needed (& is opposed) by local people. All public "consultations" have been mere "window dressing" as the local's input & opinions & wishes have been consistently ignored throughout. All forms, types & levels of government, through history, discover that without "the people" with or behind them, they all eventually fail, come unstuck and also get called to account.

I repeat, this Reviewed Core Strategy document in relation to Adastral New Town is in every sense and at every level, totally unsustainable by any normal and honest interpretation of that word.

Summary: The central plank is the new town which is unsustainable. Building on agricultural land would reduce the ability to be self-sufficient in terms of food production. The supposition that housing is needed to meet jobs is totally false because jobs are always an unknown quantity. Where will the water come from? Development effects surface water runoff. Insufficient infrastructure to cope with population increase. Local road system is inadequate. Insufficient landfill sites. RCS is unsustainable, particularly in relation to Adastral Park. Consultations are window dressing and will backfire in the...
I refer to the Local Development Framework Consultation Site Specific Allocations, (reference your letter dated 12th December 2008), when the Parish Council gave its views on potential development sites for the village. I am enclosing the response given then, and would like to make it clear that the Parish Council stand by their recommendations that site 695 Land off St Michael’s and Narrow Way was the only site acceptable.

The Parish Council would like to comment on the recent literature regarding the above, which they felt was far too long, often repetitive, with a lack of attention or concern as to the needs of the North of Suffolk, infrastructure and transport.

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I would like to express my objection to the findings in the revised LDF/Core Strategy appropriate assessment and sustainability appraisal dated Aug 2011 as being in many aspects flawed.

Respondent: Mr Parkinson [1899]  
Agent: N/A

Full Text:
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Summary:
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Attachments:
I have little further to add, other than to reiterate that what is now finally proposed in the Local Development Framework (LDF) will prove to be utter folly, and found to be lacking in vision. From the offset the LDF have pursued their own agenda, completely brushing aside the wishes of the majority of the populace. Consultation has been a sham, statements have been issued that have been incorrect and, if you dwell in the Trimleys you form the perception that they are the only villages in the District, where your quality of life is under threat, not only from the LDF, but Felixstowe Town Council, The Port of Felixstowe, Trinity College, and many others. Throughout the whole planning process there appears to be an assumption that the Trimleys are part of Felixstowe, a view apparently shared by the majority of Councillors on Felixstowe Town Council (FTC) and the LDF, as far as I am aware, they are not, and remain individual historic settlements. A classic example of this trend was clearly demonstrated in a recent report that: "planners" have given the go ahead for an office complex on the lowest plateaux of the Clickeett Hill site (Trinity 2000), as far as I am aware nobody in Trimley St Mary has been asked for an opinion. Trinity 2000 was of course, another flawed brain-child which we were told would resurrect "light engineering" in Felixstowe, and provide employment in skills that were not Port related. There is, I understand, ample empty office space in the Port area. In addition, for some reason, unbeknown to me, they (the Trimleys) are the only Key Service Centre (KSC) in the District that are considered capable of more strategic levels of growth, I find this hard to believe. In September 2005 the Trimleys were omitted from a list which ranked every parish and hamlet in the District. When questioned if this meant they were part of Felixstowe, the Council replied that: 2the hierarchy did not have any status. It had not been adopted by the Council, it was purely a discussion tool". In November 2006 when the Council gave communities in the District, six options as to where and how many new homes should be built. Option 1 had 710 homes for Felixstowe/the Trimleys, in the other five options, numbers ranged from 2,250-3,430 for Felixstowe/the Trimleys, so it would appear that, even before the opinions of the populace were known, the Council were mindset on developing the eastern fringe of Ipswich and the Felixstowe peninsula:regardless. The most worrying of all is the seemingly cavalier attitude of the LDF towards the use of prime agricultural land for housing. It is the Districts greatest asset, and if the LDF are really serious about 2long term3 planning they should ensure that it is retained for the benefit of the District, and indeed, the nation. I do not dispute the fact that there is a need for new homes, but they should be spread throughout the District. It is an opinion shared by most of the populace who reside in the Felixstowe peninsula and the Council should heed their opinions, it was, after all is said and done, the Council who requested the said opinions. Summary: I have little further to add, other than to reiterate that what is now finally proposed in the Local Development Framework (LDF) will prove to be utter folly, and found to be lacking in vision. I do not dispute the fact that there is a need for new homes, but they should be spread throughout the District. It is an opinion shared by most of the populace who reside in the Felixstowe peninsula and the Council should heed their opinions, it was, after all is said and done, the Council who requested the said opinions.

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Revised LDF - I OBJECT to the findings on the revised AA and SA dated August 2011

The issues in my previous consultation responses have not been addressed by the revisions in the AA and SA. Also inappropriate weighting has been given in the AA to out of date and irrelevant data. New data, e.g. the South Sandlings Survey and the Deben Visitor Survey, should be considered but these have only been acknowledged then ignored. An essential piece of the so called "suite of mitigation measures", the new country park, has neither site identified nor costing - so seems unlikely to ever materialise. I strongly suggest that the LDF should be returned to the cabinet for further debate.

Summary: The issues in my previous consultation responses have not been addressed by the revisions in the AA and SA.
The revision of the LDF Core Strategy docs does not address sufficiently my objections which I wrote about in my previous letter. There has been little importance given to the impact of 2000 houses on the wildlife areas around the Deben Estuary and the large number of visitors to the Area. It seems that it is easier for SCDC to say ‘No further work is required for the Core Strategy to progress’. This is not proper consultation.

Summary: The revision of the LDF Core Strategy docs does not address sufficiently my objections which I wrote about in my previous letter. The revision of the LDF Core Strategy docs does not address sufficiently my objections which I wrote about in my previous letter.
We wish to make the following comments.

1. It would appear that Suffolk Coastal has already ignored public opinion and government legislation and designated the Grade 1 farmland adjacent to Treetops as a 'site identified as sustainable for housing' - Ref. Walton Green.co.uk

   a) This directly contravenes existing government guidance which states that Grade 1 farmland should not be built on:
   Planning Policy Statement 7 (PPS7): Sustainable Development in rural Areas - paras 28 and 29
   Securing the Future - Delivering UK Sustainable Development Strategy - chapter 5
   A Better Quality of Life
   The Countryside - Environmental Quality and Economic and social Development - paras 2.17 and 2.18

   b) Having contacted the prime minister and our local MP we also have it on good authority that it may contravene the forthcoming National Planning Policy Framework due in April 2012 which will contain sustainable planning guidance relating to rural areas and the preservation of prime farmland.

   c) Being as it is now estimated that only 5% of Britain's farmland is designated Grade 1 why has Suffolk Coastal identified its only areas of Grade 1 farmland as 'sustainable for housing'? 

   d) This goes against the Felixstowe Town Council proposal to 'take a strategic approach, avoiding prime agricultural land where possible'.

   e) This also contravenes your own Strategic Policy SP1 - Sustainable development, section 11 - 'to conserve soil resources and quality. 

   f) And goes against Strategic Policy 21 'whilst preserving as far as possible prime agricultural land for essential food production'.

We would therefore ask you to reconsider this designation.

2. We support the element of Strategic Policy SP21 - Felixstowe 'Expansion of the retail, service and other facilities available within the town centre will be supported to meet the needs of the whole population both resident and visitor' and Strategic Policy SP6 - Regeneration 'The town centres where concern exists over the impact of out-of-centre stores'.

   a) Development of our town centre is crucial to Felixstowe. Whilst Suffolk Coastal may have had a lower percentage of vacant town centre units than other areas of Suffolk in 2005/6 our town centre now suggests otherwise. Development is crucial.

   b) As such we strongly object to any proposals for another supermarket in Felixstowe. We are already served by Morrisons, Solar and Lidl as well as Iceland and Tesco in the town centre. None of these is overcrowded.

   c) The small shops in Walton are well used and appreciated by the locals. Under Strategic Policy SP21 they should be preserved and protected.

We would therefore ask you to consider these points from your own Core Strategy should any planning applications for a supermarket be made.

3. We support the proposal for areas of open space for recreational exercise: 'such open space should be developed in the context of habitat creation, creating physical corridors or stepping stones' - 1.2 Likely significant effects of core strategy policies and mitigation required.

   a) there are insufficient park/recreational areas in Felixstowe for the present number of residents.

   b) Additional allotments are required.

Should you still wish to consider prime agricultural land as suitable for development we would ask you to consider either of the above options for its development.

Summary: We support the proposal for areas of open space for recreational exercise: 'such open space should be developed in the context of habitat creation, creating physical corridors or stepping stones' - 1.2 Likely significant effects of core strategy policies and mitigation required.
4264 Support

1 - Introduction

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
As concerned Woodbridge residents we welcome this consultation period. Like most regular users of facilities at Martlesham and Waldringfield, we are distressed and alarmed by the proposal to build 2000 new homes at Adastral Park. The local demand for such a major project is minimal and the local roads and infrastructure inadequate. Surely it is one of the duties of the district council to protect and treasure our still lovely environment rather than expose it to inappropriate developments that meet virtually no local needs?

We have no objection in principle to new housing within SCDC, but beg that it be spread sensitively and selectively around the district with due regard to history, aesthetics, affordability, wild life, and local need. Sacrificing Martlesham for the sake of meeting some arbitrary target is not what we taxpayers expect from our councillors and council staff.

Summary: comments regarding Core Strategy and 2000 homes at Martlesham. No objection to new housing in SCDC, but object to proposals at Martlesham
I continue to be concerned at the dismissive attitude of the council and planning department when considering the proposed development site at Adastral Park and the impacts on the Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest in the local area.

The sustainability study purportedly considered the impact of local areas of beauty and scientific interest due to the proposed development. I feel that an accurate projection of the impacts cannot be made until full summertime survey of the current use of the river is made.

The study suggests that families will not be willing to walk more than 1 km or drive more than 8 km to attend a recreational site. This figure is blatantly ridiculous. As a villager, I use the beach in the village several times during the summer months. During weekends and summer holidays, it is always heaving with individuals many of whom have travelled significant distances. I know this, because I am a sociable person, and often strike up conversations with other families paddling or crabbing or generally enjoying the environment. Many travel from Martlesham Heath, Kesgrave, Pinewood, Ravenswood areas as well as further afield, and add to the congestion in the car park and the physical impact on the beach. In addition, there are no public toilets, you frequently see children relieving themselves on the beach or being told "go into the water to have a wee".

The footpaths that people allegedly don't use because of breaches to the river wall will continue to be eroded at an even greater rate as more people walk along to the point of the breach and then return to Waldringfield.

The river itself is already busy especially on racing days. More people (many of whom, if you are honest with yourself, will move to Adastral Park in order to be closer to amenities such as the river, a point which I am confident will feature highly amongst the developers sales patter) will bring boats onto the river. As well as adding to the congestion and making the river more hazardous, they may use these to access otherwise inaccessible and sensitive areas such as The Rocks and The Tips and further cause damages to these sensitive sites.

In addition, we have a pair of seals who have made their home on the river. Consideration to the preservation of their habitat and living environment must also be taken into account.

Although the road structure was not a highlight of the sustainability appraisal, I still feel compelled to comment on it. I strongly believe that the southern access onto Newbourne Road will have significant environmental impacts on the small roads and lanes in the local area. Adastral Park residents who become irritated at having to filter out through the junction onto Foxhall roundabout may well choose to scoot off down the Buckleham Road if wishing to go to Felixstowe, or the roads through Waldringfield Heath and Waldringfield (Newbourne Road and Woodbridge Road) if wishing to head towards Woodbridge. The latter road is a single track - those individuals in search of a convenient "rat run" to work will have a significant impact on the convenience of journeys of those of use who live here, as well as significantly increasing the hazard on the road. Any access to and from this wretched development MUST be only on and of the A12 with no recourse at all to the smaller country roads. I would also be really interested to hear how you think the Orwell Bridge will cope. Or is this another case of putting your head in the sand until the money is in the bank and you will leave your successors to deal with the entirely preventable damage and disruption to the Orwell Bridge in a few years time.

I have little confidence that this letter will actually be read or that you will take my concerns into account. The planning department and BT seem to think that if you continue to put the proposed plans to enough reviews, we will eventually run out of steam and stop complaining so that you can claim that there is no public objection. As far as I am concerned there will always be an objection.

Summary: Objection to development at Martlesham and the impacts on AONB & SSSI's. A summertime study of the current use of the river needs to be undertaken. Disagrees with the 1km travel distance. Regularly sees people from much further afield by the river. People continue to use the footpaths even though they have been breached by erosion. The river is busy especially on racing days and more houses at Adastral Park will increase the number of boats. There will be significant environmental impacts on the small roads and lanes in the area, and the Orwell Bridge won't be able to cope. Believe letter will not be read or considered.
Thank you for your consultation which was discussed at our last Parish Council meeting and there was a unanimous decision to support the strategy as proposed.
Thank you for your email notifying the Highways Agency of the consultation on the updated Sustainability Appraisal and Appropriate Assessment documents relating to the Reviewed Core Strategy.

The Highways Agency does not wish to comment on either document.

Thank you for your email notifying the Highways Agency of the consultation on the updated Sustainability Appraisal and Appropriate Assessment documents relating to the Reviewed Core Strategy.

The Highways Agency does not wish to comment on either document.
As I am unable to figure out how to use your website, please accept this email as an expression of my opposition to the plans to build a new town near to Woodbridge and Waldringfield. Certainly the region needs new affordable housing, but the proposals seem entirely out of proportion.

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I understand that fresh protests have to be submitted against the planned developments at Adastral Park. I have already submitted my views, and these have not changed. I can only add that any committee which can allow this development to take place must be oblivious to the devastation it would make to the surrounding villages, and Waldringfield in particular. Here we have a beauty spot which attracts visitors throughout the summer, which has only one single road access and which has no public parking. I envisage cars left on this single road which could rapidly become impassable, and the river Deben would attract speeding, noisy and environment damaging vessels.

I beseech the Committee to think of the effect that a decision to allow the development would have on a much loved beauty spot..

Summary:
I understand that fresh protests have to be submitted against the planned developments at Adastral Park. I have already submitted my views, and these have not changed. I can only add that any committee which can allow this development to take place must be oblivious to the devastation it would make to the surrounding villages, and Waldringfield in particular.
I am a householder of Martlesham Heath and I would like you to review my comments regarding the latest Local Development Framework. My comments relate to the proposal to build a considerable number of houses on the land adjacent to the BT Research Labs at Adastral Park.

1/ The land adjacent to Adastral Park was initially purchased by BT for the expansion of its research facilities. Although BT does not now seem to be expanding its Lab facilities, I still believe the land should be earmarked for a technical based science park. As such it would attract employment to the locality. It has potential as an enterprise zone whereby companies that move there would obtain tax incentives.

However the decision to build housing is rather negative, and lacklustre. It seems BT are taking a 'cut and run' approach. There seems to be little evidence that the housing is needed (apart from various government bodies saying we must build them.) Flats in Ipswich remain empty or uncompleted.

Overall I believe the locality needs employment rather than housing. I think the District Council should be supporting this approach. (see the link below)

http://www.edp24.co.uk/business/business-features/great_yarmouth_and_lowestoft_enterprise_zone_given_the_green_light_1_996462

2/ If the housing goes ahead I cannot see the existing public transport network able to cope. There is the park and ride in Martlesham, but one requires a car in the first place to use it (these cars themselves also contributing to local traffic jams). And yes Martlesham Heath does have the 66 bus to Ipswich, and runs well during the middle of the day. But for rush hour commuter travel the bus is very slow, and takes maybe an hour to trundle into Ipswich - stopping at every stop, and held up in rush hour traffic. Further to this, many of the residents in the proposed housing estate are likely to work in Felixstowe (especially as Felixstowe docks are due for expansion). Serious thought needs to be made to provide adequate fast public transport links to Felixstowe (such as a rail or tram link). If no such transport is provided then people are forced to drive - making the housing proposals environmentally unsound.

3/ The plans do not include proposals for pedestrian access. A new footbridge across the A12 seem to have disappeared from the plans, and proposals to build new traffic lights on the A12 do not include methods for pedestrians to cross. Once again showing that the proposed housing development is environmentally unsound.

In my opinion SCDC has been negligent in not picking these environmental issues up and stipulating solutions.

Thank you for the opportunity to comment.

Yours faithfully

Thomas O'Brien

Summary:
I am a householder of Martlesham Heath and I would like you to review my comments regarding the latest Local Development Framework. My comments relate to the proposal to build a considerable number of houses on the land adjacent to the BT Research Labs at Adastral Park.
Thank you very much for consulting the Marine Management Organisation (MMO) on planning application XXXXXX.

The MMO issues marine licences under Part 4 of the Marine and Coastal Access Act 2009. We are responsible for most marine licensing in English inshore and offshore waters and for Welsh and Northern Ireland offshore waters.

A marine licence is required for many activities including those involving a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence, or construction, alteration or improvement of works on or over the sea. This may include the construction of a port or wind farm, the dredging of a channel or the use of munitions.

One marine licence may cover a number of activities for one project, e.g. to construct a new port and to dredge the approach channel to the port.

In considering an application for a marine licence, we will act in accordance with government policy statements and guidance and with the principles of sustainable development, namely:

* achieving a sustainable marine economy
* ensuring a strong, healthy and just society
* living within environmental limits
* promoting good governance
* using sound science responsibly.

I would like to advise you that in addition to planning consent the activity may require a marine licence from the MMO. Licence enquiries, screening or scoping requests and applications can be submitted to the MMO through our online licensing system or alternatively the MMO can be contacted via email (marine.consents@marinemanagement.org.uk).

If you have any further questions please do not hesitate to contact me.

Summary: No specific issues raised regarding SA & AA
Firstly we wish to complain that the online response system is not sufficiently accessible for members of the general public. Being asked to submit responses within specific sections of two very long documents only works if stakeholders want to make specific comments at these particular points. This system discourages general comments. Splitting the document into sections also means that it is impossible to search comprehensively. In fact, the process is so complicated and time consuming it could discourage stakeholders from making any comments at all.

Also we wish to complain that the website shows 2 conflicting times for the end of the consultation - on one page it states 4.45 pm and on another it states 04.45. This has been brought to the attention of the Chief Executive of SCDC.

Consultation response

NANT OBJECTS to the findings in the revised AA and SA dated August 2011.

The issues identified in our previous consultation responses of January 2011 and subsequent letters to the council have not been addressed by the revisions in the AA and SA.

The latest version of the Appropriate Assessment demonstrates a lack of rigour when presenting "evidence" for assessing environmental risk, some examples

- It concedes that no data is available on visitor numbers to the nearby Deben Estuary and yet still goes on to draw unfounded conclusions regarding the impact on the area of 2000 houses at Martlesham. New data such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then to a great extent, ignored in the conclusions.

- Although it now acknowledges that there is public car parking Waldringfield it describes this as limited. No car park in the world has an infinite number of parking spaces so that statement is literally correct. However, the car park rarely reaches capacity and is capable of accommodating a significant increase in numbers of visitors.

- Using this incorrect data it draws the erroneous conclusion that visitors would therefore not be able to arrive by car and would have to arrive on foot.

- It further concludes that this means that as long as the houses are more than 1km from the river, the new residents will not visit the river, therefore there will be no impact on the Internationally Protected Deben Estuary.

- It relies on an out of date 2006 study from Dorset to make the 1 km assumption even though later studies produced in 2008 and 2009 draw quite different conclusions as does the South Sandlings Survey.

- It states that there are breaches in the sea wall and therefore people can not go for circular walks and disturb the over-wintering birds and other wildlife. Yes there are breaches, but at greater distances from Waldringfield than stated in the AA. In fact these are precisely at the area best known for over-wintering birds. The Deben Estuary Survey shows that many people use Waldringfield as the starting point for riverside walks.

- Some of the proposed mitigation relies on the as yet undefined green space to the north of Ipswich, and/or the conversion of the Foxhall tip to a country park, which elsewhere is highlighted as being undeliverable during the lifetime of the LDF.

- The AA concludes that because of the limited information on visitor numbers, and therefore the inability to assess the impact of the 2000 houses at Martlesham, a full visitor survey should be commissioned by others in order to determine appropriate mitigation. That makes sense - it then states that this is not necessary for the core strategy. This might apply if the LDF was a true "strategic" document. However, the authors of this Core Strategy have decided to include detailed site-specific housing allocations within the LDF, it is therefore essential, logical and fair that site-specific, deliverable mitigation is correctly determined before progressing any further.

On the basis of the significant anomalies and inaccurate information within the AA and the SA the LDF should be returned to the cabinet for further debate.

Janet Elliot
Mill Cottage
Mill Road
Waldringfield
IP12 4PY

On behalf of the 4000+ supporters of NANT

Summary:

NANT OBJECTS to the findings in the revised AA and SA dated August 2011.

The issues identified in our previous consultation responses of January 2011 and subsequent letters to the council have not been addressed by the revisions in the AA and SA.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
4321 Object

1 - Introduction 1.1 - 1.5: Introduction

Change to Plan

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Attachments:

full text

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
We thank you for your letter of 25 August 2011 which was accompanied by copies of the updated Sustainability Appraisal (‘the SA Report’) and Appropriate Assessment (‘AA Report’) documents. You have asked us, as a statutory environmental body under the relevant regulations, to confirm in writing that we are satisfied with the processes and procedures used to produce the SA Report and its contents. Since receiving your letter we have met with Council representatives and following discussions we have agreed to undertake a two part response to this consultation. We have structured our response to your request along the following lines:

1) Outline of Systematic Approach to Test Adequacy of SA Report
2) Findings
3) Detailed Comments on SA and AA Report
4) Observations on comments made by other non-statutory respondents

The first part of our response, which covers Items 1 and 2, is set out in this letter. Items 3 and 4 are covered in the second part of our response which will be set out in a second letter that is expected to follow in a timely fashion once we are in receipt of the other consultation comments from the Council.

Outline of Systematic Approach to Test Adequacy of SA Report

To enable us to be satisfied with the processes and procedures used to produce the SA Report and its contents, we have carried out a broad brush review of whether the SA of the Suffolk Coastal Reviewed Core Strategy & Development Management Policies Development Plan (‘the Reviewed Core Strategy’) complies, broadly, with the SEA Regulations 2004. Although our review was carried out in a broad brush manner, we nevertheless applied what was considered by us to be a two stage systematic approach. Firstly, this approach considered the adequacy of the baseline evidence and the use made of supporting studies. Secondly, it looked at whether certain tasks, set out below, connected to the production of the SA Report, had been carried out in an adequate manner that:

1) Identified,
2) Described (as well as assessed), and
3) Evaluated

The likely significant effects on the environment of:

a) implementing the Reviewed Core Strategy; and
b) consideration of reasonable alternatives taking into account the objectives and the geographical scope of the Reviewed Core Strategy.

This systematic approach effectively reflects the requirements of regulation 12(2) of the SEA Regulations 2004. However, in our experience, the structure of Sustainability Appraisals generally adopted by those who prepare such documents does not readily (no criticism implied) follow the thrust of regulation 12(2), but rather these meld the identification, description and evaluation tasks under, quite typically, a section or chapter covering the appraisal of policies etc. There is generally a blurring between these tasks that, in our view, makes it difficult to tease out and break down any review in the absolute black and white terms of regulation 12(2). For this reason we have taken a composite approach to reporting on the adequacy of identification, assessment and evaluation tasks. We have also given consideration to generally accepted practice applied to Sustainability Appraisal (along with Strategic Environmental Assessment).

It should be noted that our review work has not been an examination in minute detail of whether or not the Council has engaged with and met the SEA Regulations 2004, but rather we have aimed to carry a review that is commensurate with the high level assessment aims embodied in Article 1 of the SEA Directive.

Findings

Overall View

Our overall view is that, subject to the addressing by the Council of issues where we consider clarification and updated baseline evidence are required, the processes and procedures used to produce the Updated SA Report have been carried out in a satisfactory manner. We would mention that the issues identified by us during our review work were principally of a clarification and interpretation nature rather than any fundamental weaknesses or flaws in the work carried out in producing the Updated SA Report. The issues concerned will be discussed in more detail in our second response. We are also able to express our satisfaction, again subject to the addressing of clarification and updated baseline evidence, with the contents of the Updated SA Report as far as this touches upon the issues within our remit.

Specific Details

We are satisfied that, broadly, the SA work has carried out to a satisfactory level, subject to the caveats mentioned above, the tasks of identifying, describing and evaluating the likely significant effects of the Suffolk Coastal Reviewed Core Strategy & Development & Management Policies Development Plan Document on the environment. In reaching this finding we have had specific regard to the appraisal of core strategy and development management policies set out in Sections C and D of the Updated SA Report respectively and the supporting appraisal tables in appendices 3 and 4.
This work reflects, in our view, a reasonably thorough and robust approach in line with generally acceptable practice and commensurate with the high level assessment objectives of Article 1 of the SEA Directive.

We have given consideration to the matter of reasonable alternatives, i.e. policy options, and here our view is that the Updated SA Report has carried out this task to a satisfactory level. The Non-technical Summary adequately touches on notable policy options considered by the Council on housing requirements and distribution with a direct reference to the key objective of sustainability. The Updated SA Report then goes on, under section 6.4, into what we consider to be a satisfactory level of consideration of policy options. We would make particular reference to the Council's description of housing distribution alternatives that may be said, in planning terms, to comprise conceptual models that aid the task of considering housing distribution patterns. For instance the Council examined patterns that restricted new developments to major centres only (Ipswich and Felixstowe), or promoted growth in major centres and market towns but restricted growth in rural villages. The Updated SA Report indicates that various permutations were explored as the Core Strategy work progressed.

Continuing on the theme of reasonable alternatives, we consider that sections 1.06 to 1.17 in appendix 6 usefully capture and summarise the work on considering policy options in relation to the district housing requirement. This work has presented, in a reasonably sufficient form, explanations for selecting preferred options and dismissal of options. The references to background documents across sections 1.06 to 1.32 demonstrate an audit trail that can be used to track the minuted detailed discussion on policy decisions. We are satisfied that the appraisal of strategic housing areas recorded in appendix 8 has been carried out to a satisfactory level, again commensurate to the high level assessment objectives of Article 1 of the SEA Directive.

Appropriate Assessment Report ('the AA Report')

Although we have not been directly requested to carry out a review of the AA Report, we consider that there is an overlap between this report and the SA Report on water quality. We therefore propose to provide comments on water quality aspects in our second response.

We hope the Council finds our comments helpful.

Summary: Although we have not been directly requested to carry out a review of the AA Report, we consider that there is an overlap between this report and the SA Report on water quality. We therefore propose to provide comments on water quality aspects in our second response.
SUFFOLK COASTAL LOCAL DEVELOPMENT FRAMEWORK - CONSULTATION ON THE UPDATED SUSTAINABILITY APPRAISAL AND APPROPRIATE ASSESSMENT FOR THE REVIEWED CORE STRATEGY

The RSPB is pleased to be able to comment on the updated Sustainability Appraisal (SA) and Appropriate Assessment (AA) for the reviewed Core Strategy. Our detailed comments are provided in Appendix 1.

In our previous comments on the Core Strategy provided dated 21st January 2011, the RSPB highlighted the fact that the Core Strategy provides an insufficient steer on the protection and enhancement of biodiversity (including habitat creation). No changes to the previous submission draft of the Core Strategy appear to have been made to address this issue. Our previous comments on the document therefore remain largely applicable, although we have made some amendments in light of the additional information provided in the updated AA.

1. Use of appropriate baseline information to assess impacts of new development on south Suffolk Natura 2000 sites.

The RSPB is pleased that the South Sandlings visitor survey report has been used to improve the baseline information supporting the conclusions in the updated AA. As we stated in our response to the revised Core Strategy and Options Consultation in February 2009, it is vital that any increase in the district's population must be carefully screened and monitored to ensure that there is not an adverse effect from increased visitor pressure to Natura 2000 sites. We therefore accept that a sufficient baseline understanding of visitors to sites such as Rendlesham Forest and Sutton Heath is available and that appropriate mitigation measures will be implemented where and when necessary. However, the RSPB remains concerned about the baseline information available to assess impacts to the areas estuaries, notably the Deben Estuary Special Protection Area (SPA) and Stour and Orwell Estuaries SPA. Whilst we are pleased that, particularly for the Deben Estuary SPA, it is noted that even relatively small increases in visitor numbers should not be treated as trivial there still remains the issue of a paucity of visitor data. We recognise that the 'No Adastral New Town' action group have carried out some visitor surveys on the Deben Estuary that broadly reflect the behaviour of the South Sandlings surveys. However, we expect the council to commit to work to ensure a suitable, up to date baseline for all the estuaries is in place prior to development taking place within the Martlesham area; something we have urged the council to do since responded to the Site Specific Allocations and Policies Issues Consultation in February 2009.

2. The use of monitoring for assessing impacts on Natura 2000 sites.

The Council (in combination with Ipswich Borough Council) must be able to show that development proposed for the Martlesham and Felixstowe areas will not adversely affect Natura 2000 sites: the Deben Estuary SPA and the Stour and Orwell Estuaries SPA, as well as the Sandlings SPA. Without an up to date baseline of current visitor numbers and their distribution it is not possible to assess the likely effects of future changes and conclude that the proposed Plan will have no adverse effects on Natura 2000 sites arising from recreational disturbance. Monitoring of effects after development, whilst important, cannot be considered as mitigation and used to conclude that there will not be an adverse effect on international sites, as it merely reports effects rather than preventing them.

3. Comments on the Appropriate Assessment conclusions and mitigation proposals.

We generally accept the findings of the AA and the proposed mitigation measures that will be necessary to avoid adverse effects on Natura 2000 sites in the future. We are particularly supportive of the need for the provision of greenspace to encourage visitor pressure away from Natura 2000 sites. The effectiveness of this greenspace, particularly a new country park, would need to be carefully monitored and a management strategy prepared for individual sites, or for a collection of smaller sites. We would expect the greenspace to be functioning fully prior to development taking place.

4. Conclusions on the soundness of the reviewed Core Strategy.

Whilst the RSPB accepts the general conclusions of the updated Appropriate Assessment, the RSPB considers that the Core Strategy remains unsound. Our comments provided in Appendix 1 reflect the inadequate consideration of biodiversity throughout the document and the need to highlight the importance of Natura 2000 sites within the district. Whilst the RSPB recognises that national guidance (for example, paragraph 5.2 of PPS123) clearly indicates that the Core Strategy should not repeat national legislation, in some circumstances it may be appropriate to provide greater clarity within a few policies by outlining policy approaches in line with legislative procedures, or reference to key policies. The RSPB therefore recommends some minor amendments to various policies (for example, Policies SP8 and SP14) that would benefit from greater reference to the Habitats Regulations 4 procedures.

5. RSPB involvement with the oral examination

The RSPB wishes to attend the oral examination of the evidence-base of the Core Strategy and Development Management Policies DPD, as well as the session covering Policies SP2 (Housing Numbers) and SP14 (Biodiversity). If you have any queries on the issues discussed above, please do not hesitate to contact me. We would be happy to meet to discuss our comments in order to resolve our outstanding concerns in advance of the formal examination of the DPD.

Yours faithfully,

Philip Pearson (Dr)

Conservation Officer

RSPB Eastern England Regional Office

Annex to the RSPB responses to Suffolk Coastal District Council's Reviewed Core Strategy

Appendix 1: RSPB comments on the Core Strategy and Sustainability Appraisal

Section 1.20 (p. 18)

The Habitats Regulations Assessment (HRA) recognises that there is a paucity of data to fully assess impacts to key Natura 2000 sites, such as the Deben Estuary SPA, but still concludes that there will not be a likely significant effect.

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from the scale of development near these sites. This is based on the assumption that people will only walk 1km or less and drive 8km or less on a regular basis. In our response to the Preferred Options document we questioned this assumption and we note that the council has not provided any evidence to support these assumptions. We consider that development at greater distances has the potential to significantly impact these sites as well.

Section 2.27 (p. 26)
The RSPB is pleased that the potential adverse effect of increased visitor pressure on the environment has been recognised. This issue could have a significant effect on Natura 2000 in the vicinity of key development areas (Martlesham and Felixstowe) and needs to be address appropriately throughout the Core Strategy and not just this one section.

Environmental Profile (pp. 29-31)
The RSPB is supportive of the Environmental Profile (EP). However, it does not consider the need for habitat creation. For example, it highlights that coastal freshwater habitats within the district will experience increased pressure from rising sea levels and coastal squeeze. These habitats support many rare species that have very limited distributions within the UK. Re-creation of freshwater habitats in more sustainable locations away from the coast is critical if species reliant on freshwater habitats are to be protected.

Strategic Policy SP1 (Sustainable Development, p. 37)
The RSPB is supportive of this policy, especially aims to (a) mitigate against and adapt to the effects of climate change, (c) achieve a local balance between employment opportunities, housing growth and environmental capacity, and (e) give priority to re-using previously developed land and buildings. Aim (j) (to conserve and enhance the best of the areas natural and built environment) should also include habitat creation.

Strategic Policy SP5 (Employment Land, p. 50)
The creation of an additional 30,000 new jobs close to Natura 2000 sites has the potential to increase visitor pressure to such sites. Careful assessment of these areas is required.

Strategic Policy SP8 (Tourism, p. 53)
The current wording of the policy fails to identify the Natura 2000 sites (notably the Deben Estuary SPA, Sandlings SPA, and Stour and Orwell Estuaries SPA) that could be impacted by increased tourism at many of the proposed development areas. These sites contain species and habitats that are highly vulnerable to disturbance from visitors, boats and other vehicles that increase noise levels and trampling. SPAs, SACs and SSSIs should be highlighted as features of importance alongside, for example, the AONB and Heritage Coast.

Section 3.133 (p. 65)
For Natura 2000 sites, it is important that the wording makes it clear that development must avoid an adverse effect in the first instance and the presumption should be that damaging development will not be permitted. Where mitigation may be acceptable, it is important that it is secured and functioning prior to development.

Strategic Policy SP14 (Biodiversity and Geodiversity, p. 67)
For Natura 2000 sites, it is important that the wording makes it clear that development must avoid an adverse effect in the first instance and the presumption should be that damaging development will not be permitted. Where mitigation may be acceptable, it is important that it is secured and functioning prior to development.

Section 3.152 (p. 69) & Development Management Policy DM21 (Design: aesthetics, pp. 128-129)
New development has the potential to reverse the declines of urban bird species such as swift, house sparrow and starling. A range of nest boxes are available that can be included in the construction of new buildings (residential and employment)

5. Development should also incorporate areas of nectar-rich plants to maintain healthy insect populations and plants that will provide seed during the winter. By providing such areas it will ensure there is a sufficient year-round food resource for birds that colonise the development. Good design principles to incorporate biodiversity into new development are contained within the Town and Country Planners Association's Ecotowns Biodiversity Worksheet 6 and Appendix 6 of the UK Green Building Council's (UK GBC) biodiversity guidance (p. 15)?Table 1 was tailored for the Rackheath Ecotown development in Norfolk, but is based on the UK GBC guidance and would be suitable to be customised for development in the district:

Table 1: Providing nesting and roosting opportunities in new buildings 8 Species Standards Crevice dwelling bats 1 box in 20 structures Bats requiring flight space Access provided in five public buildings (non-residential) Swifts 5-10 swift bricks per dwelling House martins 2-3 artificial nests on 1 in 50 buildings House sparrows 2-3 boxes/bricks on 1 in 40 buildings Starlings 1 box in 100 buildings Sections 4.14 - 4.17 (pp. 85-86)

This section highlights the proposed development of 2000 new homes at Adastral Park. The RSPB has already commented on the planning application for this development and remains opposed to the development due to the failure to provide sufficient mitigation to avoid adverse effects to the Deben Estuary SPA through increased recreational disturbance. We are concerned that the planning application for this development is more advanced than the strategic guidance that would govern sustainable development in the area.

It is important that the international importance of the Deben Estuary is identified. It is designated as a SPA for its wintering avocet population.

Strategic Policy SP20 (Eastern Ipswich Plan Area, pp. 88-89)
See comments on Sections 4.14 - 4.17 above.

Strategic Policy SP21 (Felixstowe, pp. 93-94)
Development within this area could result in a likely significant effect on Trimley Marshes and the Stour and Orwell Estuaries SPA. If development in this location is to be acceptable it must be clearly shown that any potential adverse effects can be avoided. Sufficient information needs to be provided at the Core Strategy stage to justify the allocation at
4353 Comment
1 - Introduction 1.1 - 1.5: Introduction

a strategic level.
Strategic Policies SP22 (Aldeburgh, pp. 96-97), SP24 (Leiston, pp. 98-99), SP26 (Woodbridge, pp. 101-102)
Development at these specific locations could result in increased recreational disturbance to adjacent SPAs (Alde-Ore
Estuary SPA, Sandlings SPA and Deben Estuary SPA). Any development must be carefully assessed to consider the
likely impact of new development close to such sites to ensure that they are not adversely affected.
Development Management Policy DM17 (Touring Caravan, Camper Vans and Camping Sites, p. 125)
The RSPB is pleased that extensions to such sites will only be permitted if they will not have an adverse effect on
protected sites and wildlife. Bullet Point (i), however, includes the phrase "materially adverse impact". We do not
consider this to be in line with the Habitats Regulations terminology and recommend this be amended to "adverse
impact" only.
Development Management Policy DM27 (Biodiversity and Geodiversity, p. 133)
The RSPB supports the presumption that damaging development will not be permitted. It is uncertain what is meant by
the phrase "unacceptable impact". We recommend this phrase be replaced with "adverse effect" which has a specific
meaning under the Habitats Regulations.
Table 6.1 (Monitoring Framework, pp. 149-150)
An additional indicator included for Objective 11 (Protecting and Enhancing the Physical Environment) should be
contributions of new development to BAP targets. These should monitor the amount of habitat created and
improvement of the status of key species in the district. Using the BAP targets, especially local targets, this would
provide an indication of whether the Council was meeting its statutory obligations set out in the NERC Act 2006.
RSPB comments on the Sustainability Appraisal
Table 4.3 (Key social, environmental and economic issues in Suffolk Coastal, p.38)
In the 'Biodiversity' section Natura 2000 sites are not mentioned. Suffolk Coastal supports five Special Protection Areas
that are internationally important for the bird populations they support. These should therefore be referenced, as well as
the number of Special Areas of Conservation.
Summary:
In our response on the Revised Core Strategy and associated documents dated 21st January 2011, the RSPB
highlighted the fact that the Core Strategy provides an insufficient steer on the protection and enhancement of
biodiversity (including habitat creation). No changes to the previous submission draft of the Core Strategy appear to
have been made to address this issue. Our previous comments on the document therefore remain largely
applicable, although we have made some amendments in light of the additional information provided in the updated AA.

Change to Plan

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Attachments:
letter
1.6.3 In the light of a 4000-signature petition, marches and a government in search of Localism, NANT's list of inaccuracies and inconsistencies should have addressed not just noted. This is really poor.

**Summary:**
1.6.3 In the light of a 4000-signature petition, marches and a government in search of Localism, NANT's list of inaccuracies and inconsistencies should have addressed not just noted. This is really poor.

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**Full Text:**

1.6.3 In the light of a 4000-signature petition, marches and a government in search of Localism, NANT's list of inaccuracies and inconsistencies should have addressed not just noted. This is really poor.
3982 Object

1 - Introduction 1.6: Modifications to this Appropriate Assessment

Respondent: Mr David Bucknell [2714]  
Agent: N/A

Full Text: I do not think the revised document has addressed the issues raised by NANT

Summary: I do not think the revised document has addressed the issues raised by NANT

Change to Plan

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Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
### Appropriate Assessment for Core Strategy (August 2011)

**O - 3910 - 2578 - 2.1 - 2.3: European sites potentially affected - None**

#### 3910 Object

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<th>2 - European Sites potentially affected</th>
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**Respondent:** Mr Jonathan Ruffle [2578]  
**Agent:** N/A

**Full Text:**

2.1.2 Why no mention of the Waldringfield Pit SSSI - which is actually inside the proposed area?

**Summary:**

2.1.2 Why no mention of the Waldringfield Pit SSSI - which is actually inside the proposed area?

**Change to Plan**

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**Attachments:**

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Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I OBJECT to the findings in the revised AA and SA dated August 2011.

The issues identified in previous consultation responses have not been addressed by the revisions in the AA and SA.

In addition, the AA still gives inappropriate weight to out of date and inappropriate data.

New data, such as the Sandlings and Deben Visitor Survey have been ignored in the conclusions.

An essential piece of the "suite of mitigation measures" is a new country park. No site has been identified - there is no evidence that this will materialise.

Summary:

I OBJECT to the findings in the revised AA and SA dated August 2011.

The issues identified in previous consultation responses have not been addressed by the revisions in the AA and SA.

In addition, the AA still gives inappropriate weight to out of date and inappropriate data.

New data, such as the Sandlings and Deben Visitor Survey have been ignored in the conclusions.

An essential piece of the "suite of mitigation measures" is a new country park. No site has been identified - there is no evidence that this will materialise.
Martlesham Parish Council

Response to the SCDC Consultation on Updated Sustainability Appraisal and Appropriate Assessment Documents (August 2011)

MPC Response

Martlesham Parish Council is not persuaded that the redrafting of elements of the appropriate assessment and sustainability appraisals has made the Core Strategy any more acceptable or any less flawed in its argumentation. Whilst we are reassured that there is now a clear intent to meet needs in terms of ‘well managed access to green space within settlements...without detriment to wildlife and landscape character’ there is absolutely no viable demonstration or route map as to how this will actually be achieved save deferral of the issues to the Martlesham Area Action Plan. In our view this is a total abrogation of responsibility that the design of the Core Strategy drew to itself when choosing to incorporate a site specific housing allocation. In essence the Core Strategy fails to meet the test of soundness whilst it incorporates the specific Martlesham housing allocation and does not detail a tangible means of mitigation of acknowledged issues identified by the sustainability appraisal.

Consultation response items

Note: there is no order of importance in the item numbering

1. Provision of open spaces. Neither the Appropriate Assessment (AA) nor the Core Strategy contain any tangible identified land for delivering open space from the outset of the build. AA Reference or Policy: SP20

2. Site Specific Allocation & Mitigation. If the site specific housing allocation is part of the Core Strategy, then the site specific mitigations must also be part of that Core Strategy. There is at last an acknowledgement that mitigation is required but it has been dropped to the Area Action Plan to resolve.

3. Foxhall Country Park ‘...it will be important that in the MAAP open space is provided....and is available when people first start moving to the site...' The Waste Core Strategy envisaged landfill ending in 2019 and the site being restored by 2021. Now the Market has changed and Viridor will review the situation possibly extending the mothballing. It is highly unlikely the Country Park will be established by the time the BT Martlesham development is completed. AA Reference or Policy: Page 9

4. Green Space Commitment "The developments should deliver sufficient greenspace to accommodate the increased requirement for local recreation opportunities, so that there are no impacts upon the respective SPAs. The provision of adequate public open space within strategic developments, to provide alternative recreational opportunities for routine use, will include areas which are suitable and attractive for walking dogs off leads. The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites” Any agreement that Natural England may be deemed to have given is based on the above assumption and yet the document singularly fails to address how this will be achieved. To commit to housing land without a firm commitment to green space does not recognise the scale of the risk if such land is not made available. AA Reference or Policy: para 7.2.8

5. Deben SPA. Effect of development on Deben SPA. Improvements to the evidence base are asked for, but the lack of evidence will not delay the AA & Core Strategy. It is essential that the Area Action Plan takes a cautious approach to locating development close to the Deben SPA whilst this evidence is gathered. A 1km "gap" is considered far too short with the excellent and well used footpaths already in existence, and the high proportion of leisure cyclists in the Martlesham area.

Summary: Neither the Appropriate Assessment (AA) nor the Core Strategy contain any tangible identified land for delivering open space from the outset of the build.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments: full text full text

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
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Summary:

Foxhall County Park: ‘...it will be important that in the MAAP open space is provided....and is available when people first start moving to the site...’

The Waste Core Strategy envisaged landfill ending in 2019 and the site being restored by 2021. Now the Market has changed and Viridor will review the situation possibly extending the mothballing. It is highly unlikely the Country Park will be established by the time the BT Martlesham development is completed.

Change to Plan

Appearance at Exam?
Not Specified

Legal?
Not Specified

Sound?
Not Specified

Duty to Cooperate?
Not Specified

Soundness Tests
None

Attachments:
- full text
- full text

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
3853    Object
5 - Methods of assessing European site visitor increases  5.1: Introduction
form an increased human population

Respondent: Mr Tim Elliot [388]  
Agent: N/A

Full Text: “5.1.10 A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available”. Not true. See NANT visitor survey. I object to SCDC paying Landscape Partnership for this shoddy piece of work, with its poor methodology and illogical conclusions. This is not a valid use of taxpayer’s money.

Summary: “5.1.10 A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available”. Not true. See NANT visitor survey. I object to SCDC paying Landscape Partnership for this shoddy piece of work, with its poor methodology and illogical conclusions. This is not a valid use of taxpayer’s money.

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Attachments:
OBJECT to the findings in the revised Appropriate Assessment dated August 2011.

Issues identified in previous consultation responses have not been addressed in the new version of this document and weight is still given to out of date and inappropriate data.

In Section 5 (sub-sections 5.1 and 5.3) there is unwarranted extrapolation of an inadequate data set relating to European site visitor increases resulting from an increased human population. In sub-sections 5.3.7 to 5.3.13 a figure from the now discredited Oxford Economics Study is used for the number of people per new dwelling.

Claims that people, including residents of the proposed new development, are unlikely to walk further than 1km or drive further than 8km in order to access an area of natural beauty are absurd, as is the reliance on the current limit to available parking in Waldringfield as a means of constraining an increase in visitor numbers that would otherwise result from the new development.

Mention is made of the South Sandlings Survey and the Deben Visitor Survey but these do not appear to have been fed into the conclusions.

No site has been identified for a new country park, and there is no information about the costs of establishing such an amenity. It therefore seems unlikely to me that it will ever be provided, particularly given the continuing pressure on public finances.

I therefore believe that the LDF should be debated further by cabinet.

Issues identified in previous consultation responses have not been addressed in the new version of this document and weight is still given to out of date and inappropriate data.

In Section 5 (sub-sections 5.1 and 5.3) there is unwarranted extrapolation of an inadequate data set relating to European site visitor increases resulting from an increased human population. In sub-sections 5.3.7 to 5.3.13 a figure from the now discredited Oxford Economics Study is used for the number of people per new dwelling.

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Attachments:

Email from Mr Wilmot
full text
full text
At 5.1.10 it is stated "There is a limited amount of data regarding the quantity of visitors to European sites."

The actual evidence base is described at section 9 as 'poor'. Data is 'sparse'. That 'the impact of existing visitors is patchily known'.

It is then stated "A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available, and can be used to predict increases in visitor numbers from new housing."

It is seven years old. That it can be used for such a significant decision now is questionable.

It is then stated that 'The impacts of these extra visitors are hard to predict.'

It is hard to imagine what sort of person would find these impacts hard to predict. They are obvious to anyone.

Especially as it is agreed at 6.2.35 that visitor numbers will double.

5.1.10 suggests it is appropriate to draw such important conclusions from sketchy data. It isn’t.

And that it is hard to predict the impact. It isn’t. Especially as it is agreed at 6.2.35 that visitor numbers will double.
Firstly I would like it noted that my previous substantive objections to the many LDF documents have, along with many hundreds of others, been largely ignored by the Council who appear hell bent on ensuring that the development proposed by BT goes ahead.

I want my comments treated as OBJECTIONS not comments as the council has done in previous consultations.

With regard to both the AA and the SA the process used to reach conclusions was shown to be deeply flawed in a critique by NANT, this failure of process and approach has not been addressed by the Council.

With regard to the presentation of the documents it has been made unnecessarily difficult to compare the old and new. Features such as highlighting and/or changebars would have simplified the onerous comparison task that the public must undergo. This could have been done with negligible effort by the Council and presumably was done for internal use.

Specific points on the AA

The 2004 study of visitors to the AONB used to estimate the proportion of day visitors to the AONB is out of date and undoubtedly understates the impact.

The assumption that people will not walk more than 1km is not realistic. I frequently walk to Newbourne Springs which is further.

Visitor numbers have not been surveyed, there is no baseline.

The figures for number of people per dwelling seem to have been derived in such a way as to reach the desired answer.

"further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. - One presumes that this is because it would not give the answer the Council wants!"

Specific points on the SA

Section 3.4 Who was consulted, when and how - the Council's approach to consultation is a dialogue of the deaf. The Council does not listen and appears to carry out, garishly very badly, an exercise merely to get a tick in the box.

SP20 - This policy is described as “marginally more sustainable”, because of: “the creation of a countryside park on the Foxhall tip by the end of the plan period”. And yet the Foxhall tip plan is highly uncertain so this cannot be true. See 6.9 “There is uncertainty as to when a country park could be delivered at Foxhall tip”.

Summary: With regard to both the AA and the SA the process used to reach conclusions was shown to be deeply flawed in a critique by NANT, this failure of process and approach has not been addressed by the Council.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments:
Object

5 - Methods of assessing European site visitor increases

I OBJECT to the findings in the revised AA and SA dated August 2011.

Having read the document I see there are a number of factual errors and incorrect assumptions eg.

The riverside footpath along the River Deben opposite Methersgate Quay down river to Early Creek is noted as impassable. In fact the stretches that are impassable are either side of this stretch and the paths in between are well used. The assumption made from this incorrect information is that people do not walk the path. This is utter rubbish and the path north of Waldringfield forms part of a popular circular walk with the lesser used section north of Manor House still used by local walkers. To the south of Waldringfield the path to Early Creek is a walk in itself. People will walk as far as the breach and then turn back. The breach is positioned roughly where there is a breeding colony of terns. The fields to the inland side of this path both north and south are often used for shooting parties and the paths and river also used for wildfowling in season, amongst other activities.

Most of the visitor surveys carried out are not relevant the area around Martlesham Creek and Waldringfield as they relate to the other side of the Deben. By definition the west bank of the Deben lies much closer to the areas denoted for development and will suffer from much more visitor pressure. Although the survey carried out by NANT is not as comprehensive as some others at least some effort has been made to obtain relevant information relating to these areas. SCDC would appear to have made no effort to obtain any more relevant information and have in fact relied on out of date surveys carried out in Dorset where conditions were different. Incorrect conclusions have thus been drawn.

Parking at Waldringfield is seen as self limiting however although there is now some public parking in a pay and display car park at the Maybush this does not stop people parking at the Sailing Club and causing security and access issues there, but also causing congestion along the narrow access road down to the river along the main route through the village or parking at the car parks in Church Field or the village Hall and walking down to the river along the roads or footpaths. Securing the sailing club car park is not an easy matter as many differing groups require access including guests visiting for sailing events hence a secure barrier is not the simple answer.

Mitigation is seen as essential, however Country Parks are being closed by the County Council who cannot afford to run them anymore and the area suggested would not be available at the commencement of the plan nor indeed at the likely end date. What should residents do in the meantime? and what happens when the proposed area fails to materialise? By then it will be too late! 10 years is a long period of pressure to absorb before any mitigation plans would commence. A country park cannot possibly offer the same attractions as the River Deben and the beach at Waldringfield as this is the only beach along the river. This area is also threatened with having the added attraction of a pontoon close to the Pub to provide even more easy access for yachts and power boats.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Summary:

Most of the visitor surveys carried out are not relevant the area around Martlesham Creek and Waldringfield as they relate to the other side of the Deben. The west bank of the Deben lies much closer to the areas denoted for development and will suffer from much more visitor pressure. SCDC would appear to have made no effort to obtain any more relevant information and have in fact relied on out of date surveys carried out in Dorset where conditions were different. Incorrect conclusions have thus been drawn.

Change to Plan

Summary:
3913 Object

5 - Methods of assessing European site visitor increases  5.2: Existing condition assessments of European sites form an increased human population

Respondent: Mr Jonathan Ruffle [2578]  
Agent: N/A

Full Text:

5.2.6

This is the first of four instances in this document where a conclusion is drawn directly before the validity of the evidence is dismissed.

This is not appropriate.

Summary:

5.2.6

This is the first of four instances in this document where a conclusion is drawn directly before the validity of the evidence is dismissed.

This is not appropriate.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments:
Although a few changes have been made to the AA and SA documents, there remain several serious flaws.

1. The assessment of increased visitor impact appears still to be based on a survey carried out in 2004.

2. A limited number of Land Managers were consulted and their evidence was generally anecdotal.

3. A survey of an area of heathland in Dorset was used to help predict visitor patterns - this is too different a scenario for any valid conclusions to be drawn.

4. The total increase in population from all the development plans does not seem to have been factored in when considering the increased visitor impact on the European sites. By this I mean the proposed developments at Martlesham, Felixstowe and the Ipswich Borough Council area.

5. A Country Park is proposed to help to alleviate pressure on the European sites, this is supposed to be available for use before the proposed developments get underway. However the only site put forward is Foxhall Tip, which, it is stated further on the same document, will not be available for many years. A clear contradiction.

Summary: The total increase in population from all the development plans does not seem to have been factored in when considering the increased visitor impact on the European sites. By this I mean the proposed developments at Martlesham, Felixstowe and the Ipswich Borough Council area.
I OBJECT to the findings in the revised Appropriate Assessment dated August 2011.

Issues identified in previous consultation responses have not been addressed in the new version of this document and weight is still given to out of date and inappropriate data.

In Section 5 (sub-sections 5.1 and 5.3) there is unwarranted extrapolation of an inadequate data set relating to European site visitor increases resulting from an increased human population. In sub-sections 5.3.7 to 5.3.13 a figure from the now discredited Oxford Economics Study is used for the number of people per new dwelling.

Claims that people, including residents of the proposed new development, are unlikely to walk further than 1km or drive further than 8km in order to access an area of natural beauty are absurd, as is the reliance on the current limit to available parking in Waldringfield as a means of constraining an increase in visitor numbers that would otherwise result from the new development.

Mention is made of the South Sandlings Survey and the Deben Visitor Survey but these do not appear to have been fed into the conclusions.

No site has been identified for a new country park, and there is no information about the costs of establishing such an amenity. It therefore seems unlikely to me that it will ever be provided, particularly given the continuing pressure on public finances.

I therefore believe that the LDF should be debated further by cabinet.

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Firstly I would like it noted that my previous substantive objections to the many LDF documents have, along with many hundreds of others, been largely ignored by the Council who appear hell bent on ensuring that the development proposed by BT goes ahead.

I want my comments treated as OBJECTIONS not comments as the council has done in previous consultations.

With regard to both the AA and the SA the process used to reach conclusions was shown to be deeply flawed in a critique by NANT, this failure of process and approach has not been addressed by the Council.

With regard to the presentation of the documents it has been made unnecessarily difficult to compare the old and new. Features such as highlighting and/or changebars would have simplified the onerous comparison task that the public must undergo. This could have been done with negligible effort by the Council and presumably was done for internal use.

Specific points on the AA

The 2004 study of visitors to the AONB used to estimate the proportion of day visitors to the AONB is out of date and undoubtedly understates the impact.

The assumption that people will not walk more than 1km is not realistic. I frequently walk to Newbourne Springs which is further.

Visitor numbers have not been surveyed, there is no baseline.

The figures for number of people per dwelling seem to have been derived in such a way as to reach the desired answer.

"Further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. - One presumes that this is because it would not give the answer the Council wants!"

Specific points on the SA

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Summary:

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The assumption that people will not walk more than 1km is not realistic. I frequently walk further.

Visitor numbers have not been surveyed - there is no baseline.

The figures for number of people per dwelling seem to have been derived in such a way as to reach the desired answer.

"Further work is not immediately required for this AA or the Core Strategies to progress - presume this is because it would not give the answer the Council wants!"
Methods of assessing European site visitor increases from an increased human population

Point 1, Summary:
There is no up to date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites of concern for the Appropriate Assessment. Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"There is a limited amount of data regarding the quantity of visitors to European sites” (Å§5.1.10). Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available, and can be used to predict increases in visitor numbers from new housing.” (Å§5.1.10). This survey covers the AONB as a whole. It makes no mention of the Deben Estuary SPA/SSSI/RAMSAR Site. Neither does it mention the other SSSIs near to Adastral Park (Newbourne Springs, Ipswich Heaths and Sinks Valley, Kesgrave), because they are not in the AONB. The only interview locations on the River Deben are at Melton and Bawdsey, which are irrelevant to the proposed housing at Adastral Park and Felixstowe. All the interviews were conducted in August, none in spring, autumn or winter. These facts make the AONB 2004 survey completely irrelevant to any prediction of increases in visitor numbers from new housing. In particular, the phrase "can be used to predict increases in visitor numbers from new housing" refers to visitors to the European Sites potentially affected, as listed in Å§2.1.2. In Å§2 (European sites potentially affected) it makes no mention of the AONB.

Not only is there a confusion between the AONB and European sites within the AONB, but no attempt is made in Å§5.3 to distinguish between individual European sites. For example, the Deben Estuary SPA is obviously more likely to receive a greater increase in visitor due the proposed housing at Adastral Park than more northerly sites such as the Minsmere-Walberswick SPA, but this is not mentioned. (The discussion of the South Sandlings Survey in Å§5.5 rectifies this for the European Sites within the survey area, but of course this does not cover the Deben Estuary, and it does not clarify the confusions in Å§5.3.)

Point 2, Summary:
The estimate of the net increase in people for the East Ipswich Plan Area, based as it is on 1.57 new people per dwelling, is a serious under-estimate. The figure of 1.57 comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. It contains the absurd hidden assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding. There is no evidence that there is any overcrowding in these villages.

In Å§3.7 to Å§3.13, and particularly in Table 3, an attempt is made to estimate the increase in population due to the proposed housing. To do this it uses the ‘number of new people per new dwelling’, which is much more likely to receive a greater increase in visitor due the proposed housing at Adastral Park than more northerly sites such as the Minsmere-Walberswick SPA, but this is not mentioned. (The discussion of the South Sandlings Survey in Å§5.5 rectifies this for the European Sites within the survey area, but of course this does not cover the Deben Estuary, and it does not clarify the confusions in Å§5.3.)

Point 3, Summary:
In Å§3.9 the figure of 1.57 is explained: “This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy.” It is extremely unlikely that any of the 2,000 dwellings proposed for Adastral Park will be bought for holiday homes, so the difference between the 4,540 (2,000x2.27) new occupants and the 3,140 (2,000x1.57) new people to the area must be accounted for by assuming that 1,400 (4,540-3,140) people will move to Adastral Park because of the fragmentation of multiple person households in the area, and so will not be adding to the number of extra people living near the Deben Estuary. This dubious assumption is not explained or even mentioned, let alone properly justified. It is in fact totally implausible:
In order for an occupant of the new housing at Adastral Park not to count as a ‘new’ additional person, he/she must:
5 - Methods of assessing European site visitor increases

The calculations in Table 5 and described in §5.3.15 are an attempt to predict the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as stated in the title of Table 6. However, in several places the restriction (in bold above) is not made clear, for example in §5.3.14-16. This gives the impression that it predicts the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from all potential sources. It is not clear if ‘sites’ is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.

"an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity" OK, this is an acceptable assumption.

"the relative proportions of day visitors and overnight visitors does not change" Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase.

"the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey" It is not clear if ‘sites’ is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.

The assumptions given in §5.3.14 are all highly dubious (except one):

* "the pattern of day visits to sites by the new residents is similar to that of the existing population" This is very unlikely.
* "the proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries.

The upshot of this is that the figure of 3,462 for the ‘Estimated net increase in people’ for the East Ipswich Plan Area, (Table 3), based as it is on 1.57 new people per dwelling, is a serious under-estimate. It is far more likely that the entire population of the 2,000 new houses at Adastral Park will come from outside the immediate area, and will be about 4,540 (2,000x2.27).

The only places that qualify for inclusion in (1) are: Waldringfield, Newbourne, Hemley, Brightwell, Martlesham Village and Martlesham Heath (just). Kesgrave and Grange Farm are roughly twice the distance from the Deben Estuary so can be excluded, and Woodbridge can be excluded because although it is on the River Deben, it is not on a sensitive part; "the Deben Estuary is not assessed by Natural England as being unfavourable due to human disturbance" (§6.2.35). The combined populations of these 6 villages is 6,630: so the Appropriate Assessment contains the absurd hidden assumption that 1,400 (21%) of the residents of these villages will move to Adastral Park because of pressures of overcrowding. There is no evidence that there is any overcrowding in these areas, or that there is any desire for the residents to move to the proposed housing at Adastral Park - the idea is quite ludicrous.

The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing the upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.

The actual increase in the number of people visiting the sites is not given, because the current number of visitors is unknown (because of the lack of a proper survey - see above).

The assumptions given in §5.3.14 are all highly dubious (except one):

* "the pattern of day visits to sites by the new residents is similar to that of the existing population" This is very unlikely.
* "the proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries.

* "the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey" It is not clear if ‘sites’ is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.

* an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity" OK, this is an acceptable assumption.

* "the relative proportions of day visitors and overnight visitors does not change" Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase.

* "the summer snapshot survey is typical of visitors all year round." This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to - be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

Table 4 (§5.3.13), second column reads ‘Estimated increase in people (table 2)’. The data is actually taken from Table 3.

Table 5 (§5.3.16), second column reads ‘proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1.’ The data is actually taken from Table 2.

The calculations in Table 5 and described in §5.3.15 are an attempt to predict the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as stated in the title of Table 6. However, in several places the restriction (in bold above) is not made clear, for example in §5.3.14-16. This gives the impression that it predicts the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from all potential sources. 50.5% of the total day visitors to the Suffolk Coast and Heaths AONB (including both day and overnight visitors) is realistically flawed. Column A only includes day visitors who live in Suffolk Coastal and Ipswich Borough/Pinewood. Common sense tells us that local visitors are more likely to be on day trips than those coming from further afield, and this is confirmed by comparing Map3 (g11) with Map4 (g12) in the Suffolk Coast and Heaths AONB Survey (2004). It is therefore reasonable to assume that a far larger value than 55% should be used as the multiplier in Column B (the data shown in the Suffolk Coast and Heaths AONB Survey (2004) isn’t sufficiently detailed to tell us what the value should be.) In fact it would be much more realistic to have different multipliers for the different areas - for example we know that about 95% of visitors to Martlesham are on day trips (Suffolk Coast and Heaths AONB Survey (2004) Chart 3), so if most of these came from...
the East Ipswich Plan Area we could use 95% as the multiplier in Column B, 2nd row.

Two of the three assumptions given in Â§5.3.23 are highly dubious:
* "'New' people in the Borough / District will have the same visiting pattern as 'existing' people" This is very unlikely - see comments on Â§5.3.14, first bullet point
* "Visits by holiday makers will not be affected by any increased use by local visitors" It is possible that overcrowding at popular sites will put off holidaymakers. Holiday makers generally want to visit unspoiled countryside; the urbanisation resulting from the housing allocations, particularly at Adastral Park, is very likely to deter holidaymakers.
* "Sites, including their car parks, will not constrain the number of visits by becoming 'full' and turning away visitors" OK, this is an acceptable assumption.

The uncertainties in the calculations are acknowledged by the vagueness of the conclusion (Â§5.3.26): "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% as a result ..." It would also be reasonable to assume that the increase is far higher than 5%. What justification is there for choosing 5% as the upper limit rather than, say, 10%? The flaws in the methodology, the likelihood that the assumptions in Â§5.3.14 and Â§5.3.23 are invalid, and the inappropriateness of using the Suffolk Coast and Heaths AONB Survey (2004) results in the first place all combine to make this conclusion completely worthless.

Point 4, Summary:
The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the proposed new housing in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area than the average across the AONB. One would expect the increase in the number of visitors to the Orwell and Deben Estuary SPAs to be far greater than the 8.8% estimated for the South Sandlings area. Nowhere is this obvious conclusion stated.

Another reason the figure of 2-5% is worthless is that it is an average across the whole of the AONB. 77% of the proposed new housing is in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area, all of which are far closer to the Orwell and Deben Estuaries than the other European Sites in the AONB, and these sites will therefore receive a far greater increase in visitors than the average across the whole of the AONB. Even if the figure of 2-5% is correct it tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs. This point is made in Â§5.6.1 with regard to the South Sandlings area "Fewer people living in or east of Ipswich might visit distant parts of the AONB compared to the South Sandlings, thus having a smaller impact over the AONB", but unfortunately the obvious extension of this argument to the Deben and Orwell Estuaries hasn't been made.

"It is a reasonable assumption that an increase in dwellings would generate a proportionate increase in visitors from any particular distance band. For example, if the number of houses doubled in a particular distance band the number of visitors from that area would also double" (Â§5.6). We agree with this. It is a pity that this logic can't also be applied to the impact on the Deben Estuary of the 2,000 houses proposed for Adastral Park. The calculation method described in Â§5.5.9 and Â§5.10 seems to be far more realistic than those used in Â§5.3 (criticised above), and there seems to be no good reason why it couldn't also be applied the Adastral Park - Deben Estuary situation if basic data on visitor numbers were known.

"The distribution of proposed housing is not precisely specified within the Core Strategies." (Â§5.7) This is not entirely true. One of my main complaints about the SCDC LDF Core Strategy is that it is very site-specific: 2,000 houses 'to the south and east of Adastral Park' could hardly be more site-specific.

In Â§5.5.12 the increase in the number of visitors to the South Sandlings area as a result of the Ipswich and Suffolk Coastal Core Strategies is predicted to be 8.8% (broadened to 6-12% in Â§5.5.14). Most of the housing proposed in these Core Strategies is far nearer to the Deben Estuary than it is to the South Sandlings area, so one would expect the increase in the number of visitors to the former to be far greater than 8.8%. Nowhere is this obvious conclusion stated.

(Point estimate is given for the increase in the number of visitors to the Deben Estuary as a result of the Ipswich and Suffolk Coastal Core Strategies, which is a pity as this is the SPA most affected by the extra housing.)

Point 5, Summary:
The claim that people are unlikely to walk further than 1km is absurd. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.

Throughout Â§5.6 various references are made to the ridiculous claims that people are unlikely to walk further than 1km or drive further than 8km. For example: "...only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur..." (Â§5.6.6). These are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed.

The 1km figure is invalid because:
1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked less than 1km was that there was less than 1km from the site, so didn't need to walk further.
3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

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The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. The inappropriateness of the 1km figure is borne out by the Deben Estuary Survey, which shows that 57.1% (far more than the 11% in Dorset) of visitors to the River Deben who arrived on foot walked more than 1km (Deben Estuary Survey, Â§2.19). The average distance travelled by people on foot (3.8km) easily puts the Deben Estuary SPA within the orbit of the proposed LDF Core Strategy site at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption. “The allocation east of Ipswich around Martlesham could be close to the Deben Estuary SPA” (Â§5.6.7). The allocation east of Ipswich around Martlesham is close to the Deben Estuary SPA - it is 1.8km away (as the crow flies). The use of the term ‘could be’ is disingenuous - it implies there is some leeway in where the housing goes, which isn't the case. The LDF Core Strategy specifies ‘To the south and east of Adastral Park’ which can only mean one thing - BT’s land (see BT’s planning application C09/0555).

“The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings” (Â§5.8.5). Whilst this factually correct, its significance is questionable, as the Deben Estuary Survey did not cover the winter period, it simply asked interviewees if they also visited in the winter. “The Deben Estuary visitor survey … does not have the data or analysis to predict changes in visitor numbers” (Â§5.8.8). This is partly true, a more comprehensive survey carried out by professionals would be needed for that. The survey says: “We hope that the data we have collected is helpful in providing some baseline information from which further studies can be conducted or more realistic projections made regarding increased visitor numbers resulting from the Adastral Park, Martlesham development and the consequent impact on the wildlife.” (Deben Estuary visitor survey, Â¶1.9). The point is that the Appropriate Assessment makes predictions of increases to visitor numbers without any data on current visitor numbers, so although the Deben Estuary visitor survey isn’t scientifically rigorous, it is better than nothing. Â§6.2 Policy SP2. Housing numbers

Point 6. Summary:

The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The conclusion that it is unlikely that many visitors would walk from their homes to the Deben Estuary SPA at Martlesham, and that it is expected there will be no new high levels of disturbance, are based on the flawed assumption that people won't walk more than 1km and an unrealistic reliance on greenspace provision.

“… the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk.” There is nothing wrong with the estuary-side path, it is perfectly walkable for about 2.5km up to the breach opposite Methersgate Quay. We agree with most of Â§6.2.28, although the location of the proposed housing is known precisely - it is ‘To the south and east of Adastral Park’ see comments on Â§5.6.7, above. We agree with the conclusion in Â§6.2.30: “It therefore cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA near Martlesham”. However, this is then contradicted in Â§6.2.31: “Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the greenspace provision is adequate, it is unlikely that many visitors would walk from their home to the estuary, so this recreational activity would not substantially increase on the foreshore of Deben Estuary SPA at Martlesham, and there is expected to be no new high levels of disturbance …”. The assumption that people won't walk more than 1km is invalid (see our comments on Â§5.6 above), and the reliance on greenspace provision is equally flawed (even if the greenspace appears in time, which is doubtful) - see our comments on Â§7, below. The Deben Estuary Survey showed that 32% of visitors on foot walked more than 3km to the Deben Estuary at Martlesham (Deben Estuary Survey, Â§2.19).

“It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2 - 2.5km from the Martlesham church car park (The Deben Estuary Visitor Survey by NANT of July 2011 gives 2.5km).” (Â§6.2.34) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 1.6km and 3.0km respectively (Deben Estuary Survey, Â§3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.2km.

Point 7. Summary:

The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren't necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as 'lost due to erosion' is grossly misleading. These paths are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

“This limit to parking suggests that there is limited availability for an increase in visitors arriving by car to Waldringfield.” “… ,Given the limit to available parking the increase in visitors walking along the estuary might be less than that predicted.” (Â§6.2.35) Obviously the parking space is ‘limited’, i.e. it isn’t ‘infinite! In fact there is space for about 75 cars in the public parking area and about 22 in the patrons only area. However, too much emphasis has been placed on the “limit to available parking” - this only applies at peak times, most of the year there is plenty of space. A letter to the Chair of Waldringfield PC from the manager of the Maybush, dated 16/2/10 says: “... the car park, generally, is not at capacity at any other time than school holidays, bank holidays and weekends. It is however often at capacity during these times out of our hours i.e. before 11am if the weather is fine and/or there is an event on at the sailing club.” When the car park is full visitors aren't necessarily deterred - it is common for visitors to park in Cliff Road, and recently in Church Field Car Park, causing extra congestion (Cliff Road is narrow and single lane in places). ‘It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2.5 - 3km from the Deben
estuary at Waldringfield (The Deben Estuary Visitor Survey by NANT of July 2011 gives 3km).” (§6.2.35) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 2.0km and 2.5km respectively (Deben Estuary Survey, Â§3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.1km.

"Estuary-side footpaths north and south of Waldringfield are eroded and impassable, according to data received from Suffolk County Council in August 2011 (see Figure 03). This limits the walking routes available from Waldringfield." (Â§6.2.36). Figure 03 shows that the footpath extending 1km north of Manor House and about 1.5km south of the reservoir as ‘Section lost due to erosion’. This is completely untrue and is grossly misleading. In fact the path north of Waldringfield is breached opposite Metersgate Quay about 2/3 of the way along the section shown as ‘lost’, and the path south of Waldringfield is breached just beyond Early Creek, at the southern end the section shown as ‘lost’. In places these places can get muddy in poor weather, but otherwise are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

Point 8, Summary:
The conclusion that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA is based on the invalid assumption that people won’t walk more than 1km, and the unrealistic reliance on greenspace provision. "It can be ascertained that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA, given a location well over 1km from the estuary and with adequate greenspace provision." (Â§6.2.42). This is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on Â§5.6), and the unrealistic reliance on greenspace provision - see our comments on Â§7.

"It is therefore concluded that there would be no adverse affect upon the integrity of the respective European sites." (Â§6.2.45). Again, this is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on Â§5.6), and the unrealistic reliance on greenspace provision - see our comments on Â§7.

Point 9, Summary:
No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment. No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is important because: "One estuarine site, disturbance to birds from boats was thought to be the biggest problem" (Â§5.7.6). Motor boats and jet skis, which create a large wake, also contribute to erosion of the river banks, endangering the delicate saltmarsh ecosystem. This is a serious omission from the Appropriate Assessment.

Â§7 Mitigation

Point 10, Summary:
The Appropriate Assessment places great reliance on the creation of a new country park as mitigation. This is despite the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Even if a site is found it will not have any of the attractive features of the Deben Estuary, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

The Appropriate Assessment places great reliance on the creation of a new country park, which it claims will provide mitigation by diverting visitors (and particularly dog walkers) away from the Deben Estuary. No specific site is suggested, although a location vaguely described as “to the north or north-east of Ipswich” is proposed (Â§7.2.10).

However, no mention is made of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Various wish-lists of desirable features of this mitigating greenspace are presented throughout Â§7.2. However, the ones that could actually attract visitors away from the Deben Estuary are conspicuous by their absence. Most people who visit the Deben Estuary do so because of the river. They walk along its banks, their children play on the beach and swim in the river, they sail, fish, birdwatch and engage in many other river-based activities, and of course the Maybush at Waldringfield attracts people from far and wide. A country park will not have any of these attractive features, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

There isn’t an abundance of suitable sites “to the north or north-east of Ipswich”. The phrase ‘to the north or north-east of Ipswich’ suggests that it is likely that the site will be west of the A12, and if this is the case then the Deben Estuary will be far more accessible to the residents of the proposed Adastral Park development than the mitigation site, as the A12 presents a significant barrier to walkers.

Following the dubious logic of the Appropriate Assessment, if the mitigating greenspace is more than 1km from the development, visitors are unlikely to walk there. A circle of radius 1km from Adastral Park barely reaches beyond Martlesham Heath to the west or Tesco’s car park to the north, an area that contains no significant candidate spaces, so it is difficult to see where this greenspace could come from. Unless, that is, people are expected to drive to the mitigation site, in which case it won’t have any effect on visitors going to the Deben Estuary on foot, but will increase traffic congestion west of the A12.

Recent evidence from Dorset casts serious doubt on the effectiveness of alternative greenspace in mitigating against increases in visitors to environmentally sensitive sites: "Almost all responding households had some 'Other' greenspace within 1.5km. The presence of this 'Other' greenspace had no apparent effect on reducing either the likelihood or frequency of visiting heaths... Some of the results suggest that people with more greenspace surrounding their homes may actually visit heaths more.... The most critical conclusion is that there appears to be only a slender relationship between the amount of (existing) alternative greenspace nearby and the amount of heathland visits" (East Dorset District Council Public Report - Household Survey, Footprint Ecology, May 2009, p27).

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5 - Methods of assessing European site visitor increases

4.3: Calculations to predict additional visitors to European Sites across the Suffolk Coast and Heaths

No change has been made to the conclusions on mitigation (§7.4): "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This of course depends on the mitigation being implemented and available at the start of house building. However, even if it is, it is highly unlikely that "the impacts of additional housing provisions in Policy SP2 and related policies ... will be reduced to an insignificant level" (§7.4.1). Where is the evidence that this (as yet hypothetical) mitigation will reduce the 'adverse effect' to an 'insignificant level'? The current number of visitors to the European sites isn't even known, and the increase isn't known either, so how can it be said with confidence that this increase will be eradicated with appropriate mitigation? It is pure speculation, without any basis in fact.

§8 Conclusions

Point 11, Summary:
Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

"It is concluded that policy SP2 would have an adverse effect upon the integrity of a number of European sites, alone and in combination with the Ipswich Borough Core Strategy and Policies." (§8.6.1). This we do agree with.

"Mitigation is proposed which, if implemented, would reduce the adverse effect to an insignificant level and would enable a conclusion that it can be ascertained that there will be no adverse effect upon the integrity of any European site." (§8.6.1). As explained above, given that no sites or funding have been found, mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. We believe there is no justification for this optimism, and that it is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

§9.2 Further work needed

Point 12, Summary:
It is claimed that further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. Yet it is acknowledged that the data upon which major decisions have been based is poor. No attempt will be made to get better data before the decisions are formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions. This is not how decision making is supposed to work.

"Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected." (§9.1.1). This decision was made in 2009. If SCDC had instead decided to commission a proper visitor survey at that time, it would probably be complete by now (2 years later), and could have provided a far more reliable basis for assessing the impact of the housing proposed in the Ipswich Borough and Suffolk Coastal Core Strategies.

Having acknowledged that the data is poor, the Appropriate Assessment makes the highly dubious claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." (§9.2.3) So a major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions.

Summary:

The estimate of the net increase in people for the East Ipswich Plan Area, based as it is on 1.57 new people per dwelling, is a serious under-estimate. The figure of 1.57 comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. It contains the absurd hidden assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding. There is no evidence that there is any overcrowding in these villages.

Change to Plan

Appear at exam?
Not Specified

Legal?
Not Specified

Sound?
Not Specified

Duty to Cooperate?
Not Specified

Soundness Tests
None

Attachments:
Full letter

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
§5 Methods of assessing European site visitor increases from an increased human population

Respondent: Waldringfield Parish Council (Mrs Jean Potter) [509]

Agent: N/A

Full Text:

Â§5 Methods of assessing European site visitor increases from an increased human population

Point 1, Summary:

There is no up to date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites of concern to the Appropriate Assessment. Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"There is a limited amount of data regarding the quantity of visitors to European sites" (Â§5.1.10) Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available, and can be used to predict increases in visitor numbers from new housing." (Â§5.1.10). This survey covers the AONB as a whole. It makes no mention of the Deben Estuary SPA/SSSI/RAMSAR Site. Neither does it mention the other SSSIs near to Adastral Park (Newbourne Springs, Ipswich Heath and Sinks Valley, Kesgrave), because they are not in the AONB. The only interview locations on the River Deben are at Melton and Bawdsey, which are irrelevant to the proposed housing at Adastral Park and Felixstowe. All the interviews were conducted in August, none in spring, autumn or winter. These facts make the AONB 2004 survey completely irrelevant to any prediction of increases in visitor numbers from new housing. In particular, the phrase "can be used to predict increases in visitor numbers from new housing" refers to visitors to the European Sites potentially affected, as listed in Â§2.1.2. In Â§2 (European sites potentially affected) it makes no mention of the AONB.

Throughout Â§5.3 (Calculations to predict additional visitors to European sites across the Suffolk Coast and Heaths AONB using Tourist Board data) the distinction between the AONB and the European Sites is regularly confused. For example:

- In Â§5.3.5 it says: "Many of the sites in the AONB involved in the visitor study were European sites, so the study is relevant to this Appropriate Assessment." The AONB (2004) study makes no mention of (and certainly does not 'involve') any environmentally designated sites, European or otherwise.

- In Â§5.3.21 it says: "... roughly one-quarter of all visits to the AONB originate from Ipswich Borough and Suffolk Coastal District. This assumption is also applied to the European sites within the AONB." On what basis is this assumption also applied to European sites within the AONB?

- In Â§5.3.18 it says: "Table 6 shows that the increase in visitors to the Suffolk Coast and Heaths AONB, as a result of the proposed developments is predicted to be 2.83%." In Â§5.3.25 it says: "To allow for these assumptions, the approximate 2.83% increase in total visitors to the AONB is given as a range of 2% - 5%." (our emphasis). Both of these refer to the AONB, not any European Site or Sites. But then in Â§5.3.26 it says: "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% ..." No justification is given for jumping from a conclusion about visitors to the AONB to one about visitors to European Sites.

Not only is there a confusion between the AONB and European Sites within the AONB, but no attempt is made in Â§5.3 to distinguish between individual European sites. For example, the Deben Estuary SPA is obviously more likely to receive a greater increase in visitors due the proposed housing at Adastral Park than more northerly sites such as the Minsmere-Walberswick SPA, but this is not mentioned. (The discussion of the South Sandlings Survey in Â§5.5 rectifies this for the European Sites within the survey area, but of course this does not cover the Deben Estuary, and it does not clarify the confusions in Â§5.3.)

Point 2, Summary:

The estimate of the net increase in people for the East Ipswich Plan Area, based as it is on 1.57 new people per dwelling, is a serious under-estimate. The figure of 1.57 comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. It contains the absurd hidden assumption that a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding. There is no evidence that there is any overcrowding in these villages. In Â§5.3.7 to Â§5.3.13, and particularly in Table 3, an attempt is made to estimate the increase in population due to the proposed housing. To do this it uses the 'number of new people per new dwelling', which in Suffolk Coastal is supposed to be 1.57. This is more realistic than the previous figure of 0.9, but is still seriously flawed. It comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. According to the Oxford Economics Study the occupancy rate in the East was 2.31 (in 2009) decreasing to 2.22 (in 2027), giving an average of 2.27. (p34)

In Â§5.3.9 the figure of 1.57 is explained: "This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy." It is extremely unlikely that any of the 2,000 dwellings proposed for Adastral Park will be bought for holiday homes, so the difference between the 4,540 (2,000x2.27) new occupants and the 3,140 (2,000x1.57) new people to the area must be accounted for by assuming that 1,400 (4,540-3,140) people will move to Adastral Park because of the fragmentation of multiple person households in the area, and so will not be adding to the number of extra people living near the Deben Estuary. This dubious assumption is not explained or even mentioned, let alone properly justified. It is in fact totally implausible:

In order for an occupant of the new housing at Adastral Park to not to count as a 'new' additional person, he/she must:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
4078 Comment

5 - Methods of assessing European site visitor increases

1. move to Adastral Park from somewhere at least equally near the Deben Estuary (approximately)
2. move out of a multiple person household into one with the same or lower occupancy at Adastral Park
3. not be replaced by anyone moving into the area from further afield
4. not be part of a house-moving chain involving anyone moving into the area from further afield

The only places that qualify for inclusion in (1) are: Woldingfield, Newbourne, Hemley, Brightwell, Martlesham Village and Martlesham Heath (just). Kesgrave and Grange Farm are roughly twice the distance from the Deben Estuary so can be excluded, and Woodbridge can be excluded because although it is on the River Deben, it is not on a sensitive part: "the Deben Estuary is not assessed by Natural England as being unfavourable due to human disturbance" (Â§6.2.35). The combined populations of these 6 villages is 6,630, so the Appropriate Assessment contains the absurd hidden assumption that 1,400 (21%) of the residents of these villages will move to Adastral Park because of pressures of overcrowding. There is no evidence that there is any overcrowding in these areas, or that there is any desire for the residents to move to the proposed housing at Adastral Park - the idea is quite ludicrous.

The upshot of this is that the figure of 3,462 for the 'Estimated net increase in people' for the East Ipswich Plan Area, (Table 3), based as it is on 1.57 new people per dwelling, is a serious under-estimate. It is far more likely that the entire population of the 2,000 new houses at Adastral Park will come from outside the immediate area, and will be about 4,540 (2,000x2.27).

The same criticism can be applied to the Felixstowe, Walton and the Trimleys figure of 2,763 (Table 3).

Point 3, Summary:

The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing the upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.

The actual increase in the number of people visiting the sites is not given, because the current number of visitors is unknown (because of the lack of a proper survey - see above).

The assumptions given in Â§5.3.14 are all highly dubious (except one): * "the pattern of day visits to sites by the new residents is similar to that of the existing population" This is very unlikely. * The proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries. * "the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey" It is not clear if 'sites' is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors. * "an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity" OK, this is an acceptable assumption. * "the relative proportions of day visitors and overnight visitors does not change" Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase. * "the summer snapshot survey is typical of visitors all year round." This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to - be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

Table 4 (Â§5.3.13), second column reads 'Estimated increase in people (table 2)'. The data is actually taken from Table 3.

Table 5 (Â§5.3.16), second column reads 'proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1'. The data is actually taken from Table 2.

The calculations in Table 5 and described in Â§5.3.15 are an attempt to predict the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as stated in the title of Table 6. However, in several places the restriction (in bold above) is not made clear, for example in Â§5.3.14-16. This gives the impression that it predicts the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from all potential sources. 50.5% of the total day visitors to the AONB come from outside Suffolk Coastal and Ipswich Borough/Pinewood. Increases in the populations in the areas these people come from have been excluded from the calculations. This is unrealistic - Babergh, Tendring, Waveney and all the other nearby districts all have LDF Core Strategies that propose large housing allocations and correspondingly large increases in populations. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as described in Â§5.3.15 and shown in Table 5, is logically flawed. Column A only includes day visitors who live in Suffolk Coastal and Ipswich Borough/Pinewood. In Column B this is multiplied by the proportion of visitors who are day visitors (55%). However, the figure of 55% applies to visitors from all locations, not just those from Suffolk Coastal and Ipswich Borough/Pinewood. Common sense tells us that local visitors are more likely to be on day trips than those coming from further afield, and this is confirmed by comparing Map3 (p11) with Map4 (p12) in the Suffolk Coast and Heaths AONB Survey (2004). It is therefore reasonable to assume that a far larger value than 55% should be used as the multiplier in Column B (the data shown in the Suffolk Coast and Heaths AONB Survey (2004) isn't sufficiently detailed to tell us what the value should be.) In fact it would be much more realistic to have different multipliers for the different areas - for example we know that about 95% of visitors to Martlesham are on day trips (Suffolk Coast and Heaths AONB Survey (2004) Chart 3), so if most of these came from...
the East Ipswich Plan Area we could use 95% as the multiplier in Column B, 2nd row.

Two of the three assumptions given in Å§5.3.23 are highly dubious:

* "’New’ people in the Borough / District will have the same visiting pattern as ‘existing’ people” This is very unlikely - see comments on Å§5.3.14, first bullet point

* “Visits by holiday makers will not be affected by any increased use by local visitors” It is possible that overcrowding at popular sites will put off holidaymakers. Holiday makers generally want to visit unspoiled countryside; the urbanisation resulting from the housing allocations, particularly at Adastral Park, is very likely to deter holidaymakers.

* "Sites, including their car parks, will not constrain the number of visits by becoming ‘full’ and turning away visitors” OK, this is an acceptable assumption.

The uncertainties in the calculations are acknowledged by the vagueness of the conclusion (Å§5.3.26): “It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2%- 5% as a result ... ” It would also be reasonable to assume that the increase is far higher than 5%. What justification is there for choosing 5% as the upper limit rather than, say, 10%? The flaws in the methodology, the likelihood that the assumptions in Å§5.3.14 and Å§5.3.23 are invalid, and the inappropriateness of using the Suffolk Coast and Heaths AONB Survey (2004) results in the first place all combine to make this conclusion completely worthless.

Point 4, Summary:
The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the proposed new housing in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area than the average across the AONB. One would expect the increase in the Orwell and Deben Estuary SPAs to be far greater than the 8.8% estimated for the South Sandlings area. Nowhere is this obvious conclusion stated.

Another reason the figure of 2-5% is worthless is that it is an average across the whole of the AONB. 77% of the proposed new housing is in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area, all of which are far closer to the Orwell and Deben Estuaries than the other European Sites in the AONB, and these sites will therefore receive a far greater increase in visitors than the average across the whole of the AONB. Even if the figure of 2-5% is correct it tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs. This point is made in Å§5.8.1 with regard to the South Sandlings area “Fewer people living in or east of Ipswich might visit distant parts of the AONB compared to the South Sandlings, thus having a smaller impact over the AONB”, but unfortunately the obvious extension of this argument to the Deben and Orwell Estuaries hasn’t been made.

“It is a reasonable assumption that an increase in dwellings would generate a proportionate increase in visitors from any particular distance band. For example, if the number of houses doubled in a particular distance band the number of visitors from that area would also double” (Å§5.5.6). We agree with this. It is a pity that this logic can't also be applied to the impact on the Deben Estuary of the 2,000 houses proposed for Adastral Park. The calculation method described in Å§5.5.9 and Å§5.10 seems to be far more realistic than those used in Å§5.3 (criticised above), and there seems to be no good reason why it couldn't also be applied the Adastral Park - Deben Estuary situation if basic data on visitor numbers were known.

“The distribution of proposed housing is not precisely specified within the Core Strategies.” (Å§5.5.7) This is not entirely true. One of our main complaints about the SCDC LDF Core Strategy is that it is very site-specific. 2,000 houses ‘to the south and east of Adastral Park’ could hardly be more site-specific.

In Å§5.5.12 the increase in the number of visitors to the South Sandlings area as a result of the Ipswich and Suffolk Coastal Core Strategies is predicted to be 8.8% (broadened to 6-12% in Å§5.5.14). Most of the housing proposed in these Core Strategies is far nearer to the Deben Estuary than it is to the South Sandlings area, so one would expect the increase in the number of visitors to the former to be far greater than 8.8%. Nowhere is this obvious conclusion stated. (No estimate is given for the increase in the number of visitors to the Deben Estuary as a result of the Ipswich and Suffolk Coastal Core Strategies, which is a pity as this is the SPA most affected by the extra housing.)

Point 5, Summary:
The claim that people are unlikely to walk further than 1km is absurd. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.

Throughout Å§5.6 various references are made to the ridiculous claims that people are unlikely to walk further than 1km or drive further than 8km. For example: “...only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur...” (Å§5.6.6). These are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed.

The 1km figure is invalid because:
1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked less than 1km was that they didn’t need to walk further.
3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.
The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. The inappropriateness of the 1km figure is borne out by the Deben Estuary Survey, which shows that 57.1% (far more than the 11% in Dorset) of visitors to the River Deben who arrived on foot walked more than 1km (Deben Estuary Survey, §2.19). The average distance travelled by people on foot (3.8km) easily puts the Deben Estuary SPA within the orbit of the proposed LDF Core Strategy site at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption.

"The allocation east of Ipswich around Martlesham could be close to the Deben Estuary SPA" (§5.6.7). The allocation east of Ipswich around Martlesham is close to the Deben Estuary SPA - it is 1.8km away (as the crow flies). The use of the term ‘could be’ is disingenuous - it implies there is some leeway in where the housing goes, which isn't the case. The LDF Core Strategy specifies 'To the south and east of Adastral Park' which can only mean one thing - BT’s land (see BT’s planning application C09/0555).

"The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings" (§5.8.5). Whilst this is factually correct, its significance is questionable, as the Deben Estuary Survey did not cover the winter period, it simply asked interviewees if they also visited in the winter. "The Deben Estuary visitor survey … does not have the data or analysis to predict changes in visitor numbers" (§5.8.8). This is partly true, a more comprehensive survey carried out by professionals would be needed for that. The survey says: "We hope that the data we have collected is helpful in providing some baseline information from which further studies can be conducted or more realistic predictions made regarding increased visitor numbers resulting from the Adastral Park, Martlesham development and the consequent impact on the wildlife." (Deben Estuary visitor survey, §1.9). The point is that the Appropriate Assessment makes predictions of increases to visitor numbers without any data on current visitor numbers, so although the Deben Estuary visitor survey isn't scientifically rigorous, it is better than nothing. §6.2 Policy SP2. Housing numbers

Point 6, Summary: The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The conclusion that it is unlikely that many visitors would walk from their homes to the Deben Estuary SPA at Martlesham, and that it is expected there will be no new high levels of disturbance, are based on the flawed assumption that people won’t walk more than 1km and an unrealistic reliance on greenspace provision.

"... the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk." There is nothing wrong with the estuary-side path, it is perfectly walkable for about 2.5km up to the breach opposite Methersgate Quay. We agree with most of §6.2.28, although the location of the proposed housing is known precisely - it is 'To the south and east of Adastral Park' see comments on §5.6.7. above. We agree with the conclusion in §6.2.30: "It therefore cannot be ascertained that an allocation of 2200 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA near Martlesham". However, this is then contradicted in §6.2.31: "Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the greenspace provision is adequate, it is unlikely that many visitors would walk from their home to the estuary, so this recreational activity would not substantially increase on the foreshore of Deben Estuary SPA at Martlesham, and there is expected to be no new high levels of disturbance …". The assumption that people won’t walk more than 1km is invalid (see our comments on §5.6 above), and the reliance on greenspace provision is equally flawed (even if the greenspace appears in time, which is doubtful) - see our comments on §7, below. The Deben Estuary Survey showed that 32% of visitors on foot walked more than 3km to the Deben Estuary at Martlesham (Deben Estuary Survey, §2.19).

"It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2 - 2.5km from theMartlesham church car park (The Deben Estuary Visitor Survey by NANT of July 2011 gives 2.5km). " (§6.2.34) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 1.6km and 3.0km respectively (Deben Estuary Survey, §3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.2km.

Point 7, Summary: The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren't necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as 'lost due to erosion' is grossly misleading. These paths are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

"This limit to parking suggests that there is limited availability for an increase in visitors arriving by car to Waldringfield. " "Given the limit to available parking the increase in visitors walking along the estuary might be less than that predicted." (§6.2.35) Obviously the parking space is ‘limited’, i.e. it isn’t infinite! In fact there is space for about 75 cars in the public parking area and about 22 in the patrons only area. However, too much emphasis has been placed on the "limit to available parking" - this only applies at peak times, most of the year there is plenty of space. A letter to the Chair of Waldringfield PC from the manager of the Maybush, dated 16/2/10 says: "... the car park, generally, is not at capacity at any other time than school holidays, bank holidays and weekends. It is however often at capacity during these times out of our hours i.e. before 11am if the weather is fine and/or there is an event on at the sailing club." When the car park is full visitors aren't necessarily deterred - it is common for visitors to park in Cliff Road, and recently in Church Field Car Park, causing extra congestion (Cliff Road is narrow and single lane in places).

"It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2.5 - 3km from the Deben
Comment

5 - Methods of assessing European site visitor increases

European Sites across the Suffolk Coast and Heaths

Estuary at Waldringfield (The Deben Estuary Visitor Survey by NANT of July 2011 gives 3km)." (Å6.2.35) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 2.0km and 2.5km respectively (Deben Estuary Survey, Å3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.1km.

"Estuary-side footpaths north and south of Waldringfield are eroded and impassable, according to data received from Suffolk County Council in August 2011 (see Figure 03). This limits the walking routes available from Waldringfield." (Å6.2.36). Figure 03 shows the footpath extending about 1km north of Martlesham Heath and about 1.5km south of the reservoir as 'Section lost due to erosion'. This is completely untrue and is grossly misleading. In fact the path north of Waldringfield is breached opposite Methersgate Quay about 2/3 of the way along the section shown as ‘lost’, and the path south of Waldringfield is breached just beyond Early Creek, at the southern end the section shown as ‘lost’. In places these paths can get muddy in poor weather, but otherwise are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

Point 8, Summary:
The conclusion that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA is based on the invalid assumption that people won’t walk more than 1km, and the unrealistic reliance on greenspace provision.

"It can be ascertained that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA, given a location well over 1km from the estuary and with adequate greenspace provision." (Å6.2.42). This is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on Å5.6), and the unrealistic reliance on greenspace provision - see our comments on Å7.

"It is therefore concluded that there would be no adverse affect upon the integrity of the respective European sites." (Å6.2.45). Again, this is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on Å5.6), and the unrealistic reliance on greenspace provision - see our comments on Å7.

Point 9, Summary:
No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment.

No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is important because: “On one estuarine site, disturbance to birds from boats was thought to be the biggest problem” (Å5.7.6). Motor boats and jet skis, which create a large wake, also contribute to erosion of the river banks, endangering the delicate saltmarsh ecosystem. This is a serious omission from the Appropriate Assessment.

Å7 Mitigation

Point 10, Summary:
The Appropriate Assessment places great reliance on the creation of a new country park as mitigation. This is despite the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Even if a site is found it will not have any of the attractive features of the Deben Estuary, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

The Appropriate Assessment places great reliance on the creation of a new country park, which it claims will provide mitigation by diverting visitors (and particularly dog walkers) away from the Deben Estuary. No specific site is suggested, although a location vaguely described as “to the north or north-east of Ipswich” is proposed (Å7.2.10).

However, no mention is made of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Various wish-lists of desirable features of this mitigating greenspace are presented throughout Å7.2. However, the ones that could actually attract visitors away from the Deben Estuary are conspicuous by their absence. Most people who visit the Deben Estuary do so because of the river. They walk along its banks, their children play on the beach and swim in the river, they sail, fish, birdwatch and engage in many other river-based activities, and of course the Maybush at Waldringfield attracts people from far and wide. A country park will not have any of these attractive features, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

There isn’t an abundance of suitable sites “to the north or north-east of Ipswich”. The phrase “to the north or north-east of Ipswich” suggests that it is likely that the site will be west of the A12, and if this is the case then the Deben Estuary will be far more accessible to the residents of the proposed Adastral Park development than the mitigation site, as the A12 presents a significant barrier to walkers.

Following the dubious logic of the Appropriate Assessment, if the mitigating greenspace is more than 1km from the development, visitors are unlikely to walk there. A circle of radius 1km from Adastral Park barely reaches beyond Martlesham Heath to the west or Tesco’s car park to the north, an area that contains no significant candidate spaces, so it is difficult to see where this greenspace could come from. Unless, that is, people are expected to drive to the mitigation site, in which case it won’t have any effect on visitors going to the Deben Estuary on foot, but will increase traffic congestion west of the A12.

Recent evidence from Dorset casts serious doubt on the effectiveness of alternative greenspace in mitigating against increases in visitors to environmentally sensitive sites: “Almost all responding households had some ‘Other’ greenspace within 1.5km. The presence of this ‘Other’ greenspace had no apparent effect on reducing either the likelihood or frequency of visiting heaths.... Some of the results suggest that people with more greenspace surrounding their homes may actually visit heaths more.... The most critical conclusion is that there appears to be only a slender relationship between the amount of (existing) alternative greenspace nearby and the amount of heathland visits” (East Dorset District Council Public Report - Household Survey, Footprint Ecology, May 2009, p27).
Appropriate Assessment for Core Strategy (August 2011)

4078 Comment

5 - Methods of assessing European site visitor increases

No change has been made to the conclusions on mitigation (§7.4): "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This of course depends on the mitigation being implemented and available at the start of house building. However, even if it is, it is highly unlikely that "the impacts of additional housing provisions in Policy SP2 and related policies ... will be reduced to an insignificant level" (§7.4.1). Where is the evidence that this (as yet hypothetical) mitigation will reduce the 'adverse effect' to an 'insignificant level'? The current number of visitors to the European sites isn't even known, and the increase isn't known either, so how can it be said with confidence that this increase will be eradicated with appropriate mitigation? It is pure speculation, without any basis in fact.

§8 Conclusions

Point 11, Summary:
Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

"It is concluded that policy SP2 would have an adverse effect upon the integrity of a number of European sites, alone and in combination with the Ipswich Borough Core Strategy and Policies." (§8.6.1). This we do agree with. "Mitigation is proposed which, if implemented, would reduce the adverse effect to an insignificant level and would enable a conclusion that it can be ascertained that there will be no adverse effect upon the integrity of any European site." (§8.6.1). As explained above, given that no sites or funding have been found, mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. We believe there is no justification for this optimism, and that it is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

§9.2 Further work needed

Point 12, Summary:
It is claimed that further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. Yet it is acknowledged that the data upon which major decisions have been based is poor. No attempt will be made to get better data before the decisions are formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions. This is not how decision making is supposed to work.

"Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected." (§9.1.1). This decision was made in 2009. If SCDC had instead decided to commission a proper visitor survey at that time, it would probably be complete by now (2 years later), and could have provided a far more reliable basis for assessing the impact of the housing proposed in the Ipswich Borough and Suffolk Coastal Core Strategies.

Having acknowledged that the data is poor, the Appropriate Assessment makes the highly dubious claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." (§9.2.3) So a major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions.

Summary:
The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the proposed new housing in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area than the average across the AONB. One would expect the increase in the number of visitors to the Orwell and Deben Estuary SPAs to be far greater than the 8.8% estimated for the South Sandlings area. Nowhere is this obvious conclusion stated.

Change to Plan

Appear at exam? Not Specified
Legal? Not Specified
Sound? Not Specified
Duty to Cooperate? Not Specified
Soundness Tests None
Attachments: Full letter

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
4097 Object

5 - Methods of assessing European site visitor increases

5.3: Calculations to predict additional visitors to European Sites across the Suffolk Coast and Heaths

Respondent: Mr Edward Winship [2591]  Agent: N/A

Full Text: I OBJECT to the Findings of the Appropriate Assessment as I consider the proposed development of Adastral Park in the East of Ipswich Policy Area plus kindred developments in Ipswich are bound to have a significant, negative effect on the River Deben part of the AONB and it associated SPA and SAC designated under the Ramsar Convention in contravention of PPS9.

Data from Suffolk Coasts & Heaths AONB 2004 is out of date and seems inapplicable. Common sense suggests that a significant proportion of the 4,500 or so new residents in the 2,100 new homes will introduce about 2,000 motor vehicles that a significant proportion of the residents will use to try to reach the Waldringfield road head in the hope of parking (see 5.3.23.3) during their recreation. A substantial number of them may well bring boats to launch on the Deben. As the Foxhall Country Park is likely to be delayed and will anyway be to wrong side of the A12, so many will acquire the habit of seeking recreation on or beside the Deben with Waldringfield as a focal point. 5.3.26 is a false assumption.

Summary: Data from Suffolk Coasts & Heaths AONB 2004 is out of date and inapplicable. Common sense suggests a significant proportion of the 4,500 new residents in the 2,100 new homes will introduce about 2,000 motor vehicles that a significant proportion will use to try to reach the Waldringfield road head hoping to park (see 5.3.23.3). As the Foxhall Country Park is likely to be delayed and will anyway be to wrong side of the A12, so many will acquire the habit of seeking recreation on or beside the Deben with Waldringfield as a focal point. 5.3.26 is a false assumption.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Object

5 - Methods of assessing European site visitor increases

Object: Mrs Katharine Cox [123]

Full Text:

I continue to object to the allocation of 2000 plus houses on the area next to adastral park as the new documents do not change or address the problems of increased visitor numbers to the Deben estuary, with the figures being quoted based on limited data. There is no evidence of the current number of visitors to the estuary let alone sensible projected figures.

The idea that the number of people in the area being based on 1.57 per household is flawed, coming from the oxford study which you yourselves rejected. Large numbers of people in the area will not move into these new houses and even supposing they did that still leaves houses elsewhere in the area to house new families, all increasing the pressure on local amenities including the Deben estuary, schooling, doctors, dentists and not to mention the road network.

The report talks about a park at foxhall but admits this is unlikely to be available when the houses are built so how can this be used as mitigating the loss of other green area?

I have noticed that recently it has been felt necessary to re mark the roundabout at Main road to emphasise the lanes for each turning. This indicates you are aware of the dangers of this roundabout with the current number of cars using it. Therefore increasing these numbers will make this roundabout more dangerous and encourage drivers to use old main road, through Woodbridge or Felixstowe road as a rat run to avoid the roundabout.

The noise from the A12 in nearby gardens is already high with motorised ignoring the speed limits. This is only going to get worse with more houses in the area.

Therefore I strongly object to the provision of so many houses in one area without true details of the increased visitor numbers and householders and their effect on the local area.

Mrs K Cox
11 carol avenue

Summary:

The idea that the number of people in the area being based on 1.57 per household is flawed, coming from the oxford study which you yourselves rejected. Large numbers of people in the area will not move into these new houses and even supposing they did that still leaves houses elsewhere in the area to house new families, all increasing the pressure on local amenities including the Deben estuary, schooling, doctors, dentists and not to mention the road network.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments:
Appropriate Assessment for Core Strategy (August 2011)

4130  Comment

5 - Methods of assessing European site visitor increases

5.3: Calculations to predict additional visitors to European Sites across the Suffolk Coast and Heaths

Respondent:  Deben Estuary Partnership (Christine Block) [2600]  Agent:  N/A

Full Text:  Local Development Framework - Appropriate Assessment  August 2011

Comments provided by the Deben Estuary Partnership on those parts of the Appropriate Assessment that focus on the Deben Estuary:

The Deben Estuary Partnership (DEP) is a representative community based grouping with wide current and historic knowledge of the River Deben and the estuary area. They are working with the Environment Agency, Natural England, Suffolk Coastal District Council, Suffolk County Council and other organisations and currently partnering the EA and Coast and heaths in developing the Deben Estuary Plan which replaces the concept of an Estuary Strategy compiled by the EA alone.

The DEP commented on the first version of the Appropriate Assessment under three headings - Inaccuracies, Confusing interpretation of data/information used and Factors omitted from the document. They welcome the more detailed comparisons and assessment of policies relevant to the Deben Estuary but wish to comment on some recurring inaccuracies and misleading assessments which, in their view, confuse conclusions.

Inaccuracies

6.2.22 continues to state that the Deben Estuary near Martlesham is believed to have a low to moderate level of terrestrial recreational activity. This is based on the statement that 'the estuary side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk'. As previously stated in 2009 the poor repair of the path along the river wall is, in large part, due to the numbers of visitors who, with heavily indented soles to their shoes, 'walk off' the surface of the path and escalate damage. This is recognised in the present work that is using crushed concrete to refurbish the path along the wall and provide an adequate surface suitable for the large numbers of walkers.

Equally inaccurate is the claim that 'there is no nearby visitor parking'. The nearest official public parking is indeed Woodbridge but the car park by Martlesham church - described as available for 'casual parking' - is rarely empty and it's 'casual' status does not appear to deter visitors once they have discovered its location. The report is accurate when stating (6.2.34) that 'the number of new visitors using the Martlesham church car park is not trivial.' (Experience elsewhere on the Deben demonstrates that increasing numbers of visitors are not deterred by limited car parking - they do not leave the area when car parks, both public and private, are full but park along narrow roads in the determination to reach and enjoy the river area.)

6.2.37 The report describes footpaths north and south of Waldringfield as eroded and impassable. This implies that walkers do not use the paths while in reality a breach in the north and south river walls prevents a circular walk but does not stop walkers using sections of the paths - and often diverting onto farmland when they find their route is blocked. These difficulties may limit walking routes but do not eliminate visitors from these sections of the estuary.

Omission

Throughout the section headed Impact of the Strategic allocation east of Ipswich on Deben Estuary alone or in combination no reference is made to recreational disturbance from river users. Many people moving to new housing allocations will choose to live in the area because it gives them the opportunity to own and use a boat but the Appropriate Assessment does not recognise this significant pressure. It is acknowledged that the number boat owners and those enjoying recreational activities on the river is increasing and is not limited to holiday periods. There are more moorings on the river in a number of locations and membership of yacht and sailing clubs at Waldringfield, Felixstowe, Woodbridge and Bawdsey is substantial. The wash from powered watercraft is a serious factor in saltmarsh erosion - saltmarsh is a factor in assessment of the condition of SPAs. Two pleasure boats now offering trips up and down the river during the summer season encourage increasing numbers of visitors to the riverside.

Incomplete or confusing information

The paragraphs 5.3.7, to 5.3.17 dealing with calculations to predict visitor numbers are very confusing. The Office of National Statistics predicts a declining household size of around 2.25 people per household in 2027 but a population increase predicted by 2027 requiring an increase of some 11,000 houses is seen as an equivalent to only 1.57 ‘new’ people for every dwelling. Holiday homes are given a zero occupancy. In 5.3.14 data is calculated based on a number of assumptions - one of which is the use of a visitor survey conducted in 2004.

The DEP would draw attention to the use of data from this 2004 Suffolk Coast and Heaths Visitor Survey which they see as no longer providing a reliable evidence base. Recent local knowledge, shared with the Environment Agency in connection with the development of a Deben Estuary Management Plan, drew attention to increasing numbers of tourists coming to various points along the estuary. Promotion of the Suffolk coast as a holiday destination is extending the tourist season. Visitors are coming to the estuary both earlier and later in the year and this extends the likelihood of disturbance to SPA qualifying birds.

5.3.9 states that holiday homes will be considered to have zero occupancy. In terms of potential disturbance to Estuary...
Appropriate Assessment for Core Strategy (August 2011)

5.3: Calculations to predict additional visitors to European Sites across the Suffolk Coast and Heaths

4130 Comment

5.3.7-5.3.17 re: visitor numbers are confusing. The ONS predicts declining household size of around 2.25 pphh in 2027 but a population increase predicted by 2027 requiring an increase of 11,000 houses is seen as an equivalent to only 1.57 people per dwelling.

5.3.9 Many holiday homes are owned by long standing ‘part-time’ residents and ‘occupancy’ is supplemented by guests who come to enjoy the area. Even when properties are simply holiday lets, attention must be drawn to the growing demand for accommodation and lengthening holiday period.

The Appropriate Assessment notes that, in 6.2.27, some 2000 houses at Martlesham could give rise to increased visitor use causing significant disturbance to SPA birds and trampling of water-edge habitat and a reference is made to a rare snail. Recent environmental analysis of the potential impact of work along this section of wall has highlighted the national significance of colonies of this snail and strict controls have been imposed by Natural England on areas that cannot be disturbed. Following the completion of work new fresh water scrapes will enhance high tide roosts for SPA qualifying birds. The potential degradation of this area of the Deben Estuary caused by increasing numbers of unmanaged visitors is under estimated.

Concluding comments

Methods of mitigation to counteract the impact of any increase in visitor numbers are put forward. The DEP note the cumulative impact that other land-use plans may have on nature conservation sites - the Deben estuary is seen as easily accessible, not only from Martlesham, but Felixstowe and north and east Ipswich. They support the proposals for green space and Country Parks, which could offer alternative recreational facilities - but fail to find adequate evidence in the Core Strategy to demonstrate that these are more than an aspiration.

For green space to be effective designated sites must be close to existing urban areas and new housing development and large enough to cater for a range of recreational activities - particularly dog walking. If residents have to travel any distance to a park it is likely that they will drive on to a favoured area - and, in the case of the Deben, that unquantifiable desire to be 'by the water' will come into play. It is felt that those residents who have time to do so may drive to a chosen destination rather than use a local green space - as is demonstrated every morning by the many dog walkers who drive out of Woodbridge to Sutton Heath.

It should also be noted that many parts of the SPAs do not currently manage visitors - numbers are not restricted, dogs not controlled, alternatives to sensitive sites not signposted - freedoms that many visitors may resist giving up. The cost of introducing visitor management schemes and year round wardens would be substantial.

Drawing an accurate conclusion that there is no adverse effect on European sites must be further qualified by:

- the inconclusive knowledge regarding visitor numbers. References to the possible resultant increase of disturbance or trampling damage to qualifying features on estuarine/coastal sites are difficult to put in an accurate context and it is consequently 'not possible to ascertain that there will be no adverse effect upon the integrity of the Deben estuary SPA'.
- the somewhat limited nature of Natural England's monitoring regime of SPA sites and condition assessments which do not rule out visitor level impact. There are a number of references to the fact that the specific reasons for unfavourable condition do not include visitor/human pressures/recreational impacts when these may indeed be significant factors. The only redress to this is anecdotal evidence which suggests - as in 6.2.13, the Sandlings SPA - that 'current visitor levels are causing harm with dogs off leads having the greatest impact'.
- the lack of guidance on the level of adverse impact that constitutes unacceptable disturbance and damage to a European site.

It therefore remains difficult to accept (in 6.2.45) that 'provided that strategic housing proposals for development at Martlesham and Felixstowe Peninsula are greater than 1km from the Deben Estuary' and that there are 'improvements in accessibility to green space provision' it can be concluded that 'there would be no adverse affect upon the integrity of the respective European Sites'.

Christine Block

On behalf of the Deben Estuary Partnership
October 14th 2011

Summary:

5.3.7-5.3.17 re: visitor numbers are confusing. The ONS predicts declining household size of around 2.25 pphh in 2027 but a population increase predicted by 2027 requiring an increase of 11,000 houses is seen as an equivalent to only 1.57 people per dwelling.

5.3.14 data is calculated on assumptions including survey from 2004.

Data from 2004 no longer provides a reliable evidence base. Visitors are coming to the estuary both earlier and later in the year and this extends the likelihood of disturbance.

Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Appropriate Assessment for Core Strategy (August 2011)

C - 4130 - 2600 - 5.3: Calculations to predict additional visitors to European Sites across the Suffolk Coast and Heaths AONB using tourist board data - None

4130 Comment

5 - Methods of assessing European site visitor increases

5.3: Calculations to predict additional visitors to form an increased human population

European Sites across the Suffolk Coast and Heaths

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Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
4250 Object

5. Methods of assessing European site visitor increases form an increased human population

5.3 Calculations to predict additional visitors to European Sites across the Suffolk Coast and Heaths

Respondent: Mrs Ruth Lubbock [1752]

Agent: N/A

Full Text:

Please note that I still object to the proposed loss of agricultural land.

AA paragraph 5.3 The low figure of 1.57 residents per house is not convincing; if there is work available this denoted families.

5.6 Healthy people regularly walk more than 1km. The proposed site is within easy walking distance of Waldringfield, and therefore likely to cause disturbance to wildlife.

Summary:

AA paragraph 5.3 The low figure of 1.57 residents per house is not convincing; if there is work available this denoted families.

Change to Plan


Not Specified Not Specified Not Specified Not Specified None

Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Object

5 - Methods of assessing European site visitor increases form an increased human population

Full Text:

The following points convey my strong objections with particular reference to the proposed housing development at Martlesham Heath. In this letter I am focusing my objections on a critique of the revised documents with respect to protection of the environment and wildlife habitats.

1. Methods of assessing the increase of visitors to European sites

The method of calculating the number of new people per dwelling for the new housing development at Martlesham Heath continues to be opaque to me. Just as the basis of the figure of 0.9 in the September 2009 document was never clarified, neither has the new figure been even though it is slightly more realistic at 1.57 (AA5.3). If the number of new people calculated is unreliable, then the predicted increase in number of visitors to the Deben Estuary (AA 5.3) will be meaningless.

There appears to be an assumption that people moving to the new development will vacate existing housing close by and so will not increase the total number of residents in the area. I have found no evidence to support this assumption.

It makes no sense to base visitor predictions on outdated data from a survey of the AONB published 7 years ago (2004). To be any use, the data should be broken down into visits to specific sensitive European sites within the AONB (ie the Deben Estuary SPA, its European-protected Ramsar wetlands site, Newbourne Springs etc). Predictions made in the Appropriate Assessment (AA) document are especially meaningless given its admission that 'the impacts of these extra visitors are hard to predict.' (AA 5.10) Yet, an increase in visitor numbers to the AONB has been predicted - given as having increased from 2.48% (Sept 2009) to 2.83% (Aug 2011) (AA 5.3). How can a percentage prediction be calculated without knowing the frequency of visits? The obvious solution is to delay any planning decision until an up-to-date independent scientific survey of visitor numbers and impact on the sensitive European sites within the AONB is conducted.

The revised AA document continues to assume (based on the 2005 Dorset study) that people will not walk more than an average of 1km or drive more than 8km on average for recreation (AA 5.6). Extrapolating from an old study done in a different geographical area is inappropriate to the Deben Estuary, as was pointed out by many respondents in response to the previous consultation, but ignored. Walks and drives for day trips out typically cover much longer distances, especially to the Deben Estuary and Waldringfield with its added attractions of the beach, the river and the Maybush pub.

The AA document contradicts itself later on when referring to the visitor survey conducted by Natural England in 2010-11 (AA 7.2.8). As quoted in the AA document, the NE survey reported that 'two-thirds of visits (66 per cent) were taken within two miles (3.2km) of the respondents' home' (AA 7.2.8). This 3.2km figure is similar to the mean reported by NATTs (2011) Deben Estuary survey of '3.8km for distances travelled on foot' (AA 5.8.6). There is no doubt, therefore, from these figures quoted by the revised AA document itself that many walkers exceed the specified 1km average when visiting this unique area of the Deben Estuary.

Summary of point 1: methods of assessing the increase of visitors to European sites

The method of calculating the number of new people per dwelling for the new housing development at Martlesham Heath continues to be unclear (AA5.3). The predicted increase in number of visitors to the Deben Estuary (AA 5.3) is meaningless when based on unreliable data.

Similarly, basing visitor predictions on outdated, non-representative, non-specific and inaccurate data are meaningless (AA 5.3, 5.10). The obvious solution is to delay any planning decision until an up-to-date independent scientific survey of visitor numbers to and impact on the sensitive European sites within the AONB is conducted.

2. Mitigation for housing allocations east of Ipswich

The assertion that provision of greenspace local to the new housing will be sufficient for dog-walkers and will have 'no impacts on the respective SPA's (AA 7.2.8) is based on a false assumption. The revised AA document fails to recognize people's recreational wishes and habits. Walks to exercise dogs on a daily basis are indeed likely to be short (perhaps no more than 1km) and take place in the new local green space proposed. But people also look for day trips further afield where there are other attractions (the village pub, river activities, beach at Waldringfield and Deben Estuary SPAs, Ramsar wetlands and SSSIs). The Deben Estuary is no more than 1km from the proposed Martlesham Heath development at its nearest point. It is much closer than the 3.2km average distance covered by walkers reported by Natural England 2010/11 (AA 7.2.8) and the 3.8km average reported by the NANT 2011 survey (AA 5.8.6).

As well as walking, many visitors will and do drive to the SSSIs/SPAs of the Deben Estuary on a regular basis because of its proximity (much less than the 8km criterion from the proposed new housing specified in the documents) and they park in Waldringfield. Car-drivers will not be deterred from driving to Waldringfield and the European-protected sites of the Deben Estuary because a public car-park is now available and located conveniently by the pub and the river. It is untenable, therefore, to accept the revised AA document's conclusion (unchanged from the earlier version) that ‘...with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site.’ (AA 7.4).

Even if three of the proposed mitigation measures (ensuring at least 1km separates the new development from
European-protected sites, provision of local greenspace, wardening and visitor management, SA table 3.2) are provided before the development work begins, the fourth requirement (provision of a new country park) will certainly not be. The revised Sustainability Appraisal (SA) document admits that 'the County Council is currently ceasing to fund such parks' (SA table 3.2) and the likelihood of alternative funds becoming available to restore the Foxhall tip before the Martlesham Heath development goes ahead is nil. Therefore, the threat of damage to the Deben Estuary and its SPA/SSSIs and European-protected Ramsar sites remains and is probably inevitable.

It is mystifying that the conclusions reached by the revised AA document (AA 8) are unchanged since the September 2009 version. Although the revised document concedes that 'It is not possible to ascertain that Policy SP2 has no adverse affect upon the integrity of a number of European sites (without mitigation), because of increased visitor pressure', it assumes that the mitigation strategies proposed will be sufficient to avoid any 'adverse effect upon the integrity of any European site' (AA 8.1.1, 8.1.2). This conclusion is reached even though the document acknowledges that better evidence of the impact of visitor numbers on European sites would have been desirable (AA 9.1). In the next paragraph we read, "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." (AA 9.2). Reaching this conclusion whilst acknowledging the paucity of the evidence and ignoring the most recent evidence available is unacceptable. Why cannot the evidence be first sought through an up-to-date independent study of visitor impact on the relevant European sites? Delaying any planning decision in the Martlesham Heath area until the evidence is available is a small price to pay. Going ahead with the proposal and risking irreversible damage to wildlife habitats protected under European law would be far worse.

Summary of point 2: mitigation for housing allocations east of Ipswich

People walk and drive much further for day trips out than daily dog-exercising walks of 1km. The new local green space proposed will not be sufficient for day trips as the Natural England 2010/11 (AA 7.2.8) and the NANT 2011 surveys (AA 5.8.6) confirm.

Even if three of the proposed mitigation measures are provided before the development work begins, the fourth requirement (provision of a new country park) will certainly not be. The SCC is ceasing to fund such parks and alternative funding is unlikely. Without a new country park the threat of damage to the European-protected sites is inevitable.

Conclusion

Like their predecessors, these revised documents continue to lack clarity and reach conclusions that ignore the evidence. Delaying any planning decision in the Martlesham Heath area until the evidence is available is a small price to pay. Going ahead with the proposal and risking irreversible damage to wildlife habitats protected under European law would be far worse.

The need for more affordable housing in East Suffolk is irrefutable and the decline in provision over past decades is lamentable. A large-scale, single-site new town on rural Greenfield land is not the answer, however. Alternative strategies have not been properly investigated, such as dispersal of housing in small developments throughout the district.

Summary:
The method of calculating the number of new people per dwelling (1.57) for the new housing development at Martlesham Heath continues to be unclear (AA5.3). The predicted increase in number of visitors to the Deben Estuary (AA 5.3) is meaningless when based on unreliable data.

Similarly, basing visitor predictions on outdated, non-representative, non-specific and inaccurate and data are meaningless (AA 5.3, 5.10). The obvious solution is to delay any planning decision until an up-to-date independent scientific survey of visitor numbers to and impact on the sensitive European sites within the AONB is conducted.

Change to Plan

| Table: Change to Plan |
|-----------------------|----------------|
| **Legal?**            | **Sound?**     | **Duty to Cooperate?** | **Soundness Tests** |
| Not Specified         | Not Specified  | Not Specified           | None |

Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
In particular I disagree with the conclusions regarding the impact on The Deben Estuary close to Martlesham and Waldringfield. It is clear that the impact will be much greater than the report suggests.

Several of the assumptions used cannot be substantiated. For instance the household size is simply a projection of past trends. There are many reasons why this figure can be challenged: particularly in light of the continuing economic downturn and fuel poverty amongst the elderly and single person households. Even this low figure has been reduced further to 1.57 by considering the district as a whole. When calculating the number of “new people” in the area close to the Deben Estuary at Waldringfield the correct figure should be 2.3 or more. Any calculations based on the low figure are therefore incorrect when applied to specific locations.

The Natural England national visitor survey states that two-thirds of visits were taken within 3.2km of the respondents home. The LDF is proposing that the number of dwellings within this distance from Waldringfield should be increased from around 360 to 2400 or more, with a consequential increase of population of about 600%. The Deben Estuary at Waldringfield and Martlesham are the only areas of public green space within 3.2km of the proposed new settlement and the resulting increase in visitor numbers would have a devastating effect.

Although the report concentrates on the effect of dog walking, there are other problems resulting from increased visitor numbers. As Waldringfield Harbourmaster, I have seen an increasing number of powered vessels launching from Waldringfield. The owners of these vessels are mainly from within 5 miles and I would expect an increase in the local population to result in much more pressure in this respect. The owners often disregard the SCDC speed limit on the river and cause noise and disturbance to birds and other wildlife and erosion to the river banks.

During the summer months I am also aware of an increasing amount of litter from picnics, discarded crabbing lines and bait (mainly bacon and raw meat). This is often left by groups of young people who arrive by cycle. It is likely that they are from the local area (east of Ipswich) and any increase of the local population will certainly exacerbate this problem. Although it is assumed that limited car parking will impose a limit on visitor numbers, the proposed new development is within walking or cycling distance of Waldringfield and the number of visitors from this development would not be so constrained.

It is inconceivable that any of the proposed mitigation measures will have any effect on any of these problems.

Several of the assumptions used cannot be substantiated. For instance the household size is simply a projection of past trends. ...... Even this low figure has been reduced further to 1.57 by considering the district as a whole. When calculating the number of “new people” in the area close to the Deben Estuary at Waldringfield the correct figure should be 2.3 or more. Any calculations based on the low figure are therefore incorrect when applied to specific locations.
### 5 - Methods of assessing European site visitor increases

Table 2

<table>
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<tr>
<th>Object</th>
<th>Form an increased human population</th>
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**Respondent:** Mr James Barclay [2495]  
**Agent:** N/A

**Full Text:** this is hardly useful information - it is too small to be relevant

**Summary:** this is hardly useful information - it is too small to be relevant

### Change to Plan

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**Attachments:**

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Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
3914 Object

5 - Methods of assessing European site visitor increases Table 2
form an increased human population

Respondent: Mr. Jonathan Ruffle [2578]  Agent: N/A

Full Text: It is stated at 5.3.10 that "In other words some of the residents of those additional dwellings will come from existing
dwellings within the area and so not be new additional people".

This is false reasoning. People will move to Martlesham. In the event they lived locally before, those houses will be filled
also. So, whether new or not, there will be more people.

Indeed, if the spaces they leave are not filled by more people, then there was no requirement for the Martlesham
houses to be built.

5.3.10 goes on to say "The patterns of births, death, and people moving out of, within, between and into, Ipswich
Borough or Suffolk Coastal District are complex, but the population predictions are realistic and there are no better
alternatives"

No better alternatives? This is a proposal to carpet the countryside in concrete and put six-storey tower blocks next to
an AONB. The authors of this assessment better go and find some better alternatives, and pronto.

Summary: Weak reasoning leads to erroneous conclusion.

Change to Plan


Attachments:
The figure of 1.57 people per dwelling is unrealistic and has already been rejected by SCDC. We are told in 5.3.9 that these figures do not refer to new housing which is what Table 3 is about. The information in this table is therefore almost certainly wildly inaccurate.
I object to the revised sustainability appraisal and appropriate assessment of the core strategy on the grounds that there are a large number of errors in the document. I highlight the main ones below.

**APPROPRIATE ASSESSMENT**

Table 3 estimates the increase in population as a result of the proposed housing. It takes a value of 1.57 as the number of new people per dwelling. No justification is provided for this value. Since the total number of people arising from these houses is a key input to this report this is unacceptable. Either this number is justified or a much higher number assumed to provide a margin of error. In any case the conclusions based on this value are suspect and should be identified as such. Further on in the document it states that the low figure of 1.57 is due to an unstated assumption that roughly one third of the future residents of any new housing will move out of existing housing in the area and hence will not be adding to the number of extra people living near the sensitive sites. This is an unproven assertion and again any conclusions based on this should be removed unless it can be proven or justified.

The document comments about lack of parking in the area limiting the number of people visiting. But this only applies at peak times. For the majority of the time parking is not an issue.

The document states "Estuary-side footpaths north and south of Waldringfield are eroded and impassable ... This limits the walking routes available from Waldringfield." This is true but does not mean that no one will ever use the path. It is still used along its navigable part.

Having acknowledged that the data is poor, the assessment makes the unsupportable claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." Since a major planning decision is being made on this evidence it beggars belief that the council can ignore this fundamental weakness. There appears to be no intention of obtaining any further evidence either. Is this because it might actually contradict the conclusions of this assessment?

No change has been made to the conclusions which the assessment reaches regarding mitigation: "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This is only true if mitigation is actually implemented and is available at the start of house building. There is no mention of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

The impact of extra people visiting the Waldringfield area is discussed in the document. There has been no alteration of the unsubstantiated claim that people are unlikely to walk further than 1km or drive further than 8km. These claims are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed. The 1km figure is invalid because:

- the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
- the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing.
- the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
- the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. This was confirmed by a study made by NANT, which showed that people walked an average of 3.8km to the Deben Estuary.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
4020 Object

5 - Methods of assessing European site visitor increases  Table 3

form an increased human population

Although the document admits that there is only a small amount of data regarding visitor numbers to sites in Europe it goes on to draw a significant number of important conclusions from this data. This is a flawed approach and requires either more data to substantiate the claim or that the conclusions drawn be removed from the document.

Finally the true increase in the number of people visiting the sites cannot be given because the current number of visitors is unknown as no accurate survey has been undertaken.

SUSTAINABILITY APPRAISAL

In the review of SCDC's responses to consultation comments on the sustainability assessment and Reviewed Core Strategy many of the responses are inadequate and many simply state "No change to SA required" without any attempt to justify why this might be. Given the significance of the core strategy this is not acceptable.

This policy is described as "marginally more sustainable" by virtue of "the creation of a countryside park on the Foxhall tip by the end of the plan period". The reference to the Foxhall Tip is contradicted in the last paragraph where it states that designated areas will need to be safeguarded "by providing open space as part of the housing development at the beginning of the development". Also it is pointed out that "Foxhall Country Park is unlikely to be developed within the plan period". Consequently the policy is not more sustainable than before and in fact is less sustainable since no proposals have been made for any countryside parks at the beginning of the development.

Only the briefest mention is made of the potential impact of increased boating activities on the River Deben. In fact this is a potentially serious problem and has been ignored and passed across to the area action plan. Large boats, and particularly motor boats, have a powerful disturbing affect on feeding birds, and they are a major cause of erosion of the fragile saltmarsh ecosystem. This point has been made several times by NANT and Waldringfield PC and has been consistently ignored.

The document states "There is uncertainty as to when a country park could be delivered at Foxhall tip". The key point is that it will not be in place when any development on the 2000 houses at Martlesham begins. In spite of this the assertion is still present in the document that these 2,000 houses will have an insignificant impact on the nearby European sites. This will only be the case if mitigation appears at the start of house building, and is very unlikely to happen.

Summary:

Table 3 estimates the increase in population as a result of the proposed housing. It states 1.57 as the number of new people per dwelling. No justification is provided for this value. Since this is a key input to this report this is unacceptable. Either this number is justified or a much higher number assumed to provide a margin of error.

1.57 is due to an unstated assumption that roughly one third of the future residents will move out of existing housing in the area. This is unproven.
5 - Methods of assessing European site visitor increases  Table 4
form an increased human population

Respondent:  Mr Jonathan Ruffle [2578]  Agent:  N/A

Full Text:  5.3.16 -- it is claimed 'for clarity' the results are expressed as a proportion of 1.

Up to this point we were dealing in percentages. It is very poor to change methodology in the middle of a subsection. The lay reader has to ask whether the aim is clarity or obfuscation.

Summary:  5.3.16 -- it is claimed 'for clarity' the results are expressed as a proportion of 1.

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3827  Object
5 - Methods of assessing European site visitor increases  Table 5
form an increased human population

Respondent: Mr James Barclay [2495]  Agent: N/A

Full Text: Column A. There is no table 1. Do these figures refer to table 2? If so the sample is quite inadequate from which to draw conclusions. Column 3 therefore ditto. The table three figures are unrealistic due to using the 1.57 multiplier. Column D multiplies two columns of discredited figure making the result completely unreliable and probably wrong by many basis points.

Summary: Column A. There is no table 1. Do these figures refer to table 2? If so the sample is quite inadequate from which to draw conclusions. Column 3 therefore ditto. The table three figures are unrealistic due to using the 1.57 multiplier. Column D multiplies two columns of discredited figure making the result completely unreliable and probably wrong by many basis points.

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Attachments:
3916  Object

5 - Methods of assessing European site visitor increases  Table 6
form an increased human population

Respondent:  Mr Jonathan Ruffle [2578]  Agent:  N/A

Full Text:  5.3.20 - 22

This AONB data is seven years old.

This is a proposal to carpet the countryside in concrete and put six-storey tower blocks next to an AONB. The authors of this assessment better go and find some new data, and quickly.

Its not good enough to claim this is the best available.

Summary:  5.3.20 - 22

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3917 Object

5 - Methods of assessing European site visitor increases Table 6 form an increased human population

Respondent: Mr Jonathan Ruffle [2578]  Agent: N/A

Full Text: The assumptions made at 5.3.23 are based on sketchy understanding of human nature.

New people in the Borough / District will have moved here on the promise of living next to an AONB. They’ll visit in large numbers because they are living far closer than any of the people to whom they are being compared.

Of course, visits by holiday makers will be affected by any increased use by local visitors. The place will be packed, reducing amenities for all.

“Sites, including their car parks, will not constrain the number of visits by becoming ‘full’ and turning away visitors”. This is right but for the wrong reason: people will park wherever they think they can get away with.

Summary: The assumptions made here are suspect.

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### Appropriate Assessment for Core Strategy (August 2011)

#### Object

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<tr>
<th>3918</th>
<th>5 - Methods of assessing European site visitor increases to form an increased human population</th>
<th>5.5: Calculations to predict additional visitors to European Sites in the South Sandlings using 2010 visitor survey data</th>
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<tr>
<td><strong>Respondent:</strong> Mr Jonathan Ruffle [2578]</td>
<td><strong>Agent:</strong> N/A</td>
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<td><strong>Full Text:</strong></td>
<td>5.5.7: &quot;The distribution of proposed housing is not precisely specified within the Core Strategies.&quot;</td>
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<td>Everyone knows where the 2000-house housing estate is going to within a very few metres - why this blurring of the situation?</td>
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I object to the revised sustainability appraisal and appropriate assessment of the core strategy on the grounds that there are a large number of errors in the document. I highlight the main ones below.

**APPRIOPRIATE ASSESSMENT**

Table 3 estimates the increase in population as a result of the proposed housing. It takes a value of 1.57 as the number of new people per dwelling. No justification is provided for this value. Since the total number of people arising from these houses is a key input to this report this is unacceptable. Either this number is justified or a much higher number assumed to provide a margin of error. In any case the conclusions based on this value are suspect and should be identified as such. Further on in the document it states that the low figure of 1.57 is due to an unstated assumption that roughly one third of the future residents of any new housing will move out of existing housing in the area and hence will not be adding to the number of extra people living near the sensitive sites. This is an unproven assertion and again any conclusions based on this should be removed unless it can be proven or justified.

The document comments about lack of parking in the area limiting the number of people visiting. But this only applies at peak times. For the majority of the time parking is not an issue.

The document states "Estuary-side footpaths north and south of Waldringfield are eroded and impassable ... This limits the walking routes available from Waldringfield." This is true but does not mean that no one will ever use the path. It is still used along its navigable part.

Having acknowledged that the data is poor, the assessment makes the unsupportable claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." Since a major planning decision is being made on this evidence it beggars belief that the council can ignore this fundamental weakness. There appears to be no intention of obtaining any further evidence either. Is this because it might actually contradict the conclusions of this assessment?

No change has been made to the conclusions which the assessment reaches regarding mitigation: "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This is only true if mitigation is actually implemented and is available at the start of house building. There is no mention of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

The impact of extra people visiting the Waldringfield area is discussed in the document. There has been no alteration of the unsubstantiated claim that people are unlikely to walk further than 1km or drive further than 8km. These claims are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed. The 1km figure is invalid because:

- the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
- the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing.
- the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
- the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. This was confirmed by a study made by NANT, which showed that people walked an average of 3.8km to the Deben Estuary.
Although the document admits that there is only a small amount of data regarding visitor numbers to sites in Europe it goes on to draw a significant number of important conclusions from this data. This is a flawed approach and requires either more data to substantiate the claim or that the conclusions drawn be removed from the document.

Finally the true increase in the number of people visiting the sites cannot be given because the current number of visitors is unknown as no accurate survey has been undertaken.

SUSTAINABILITY APPRAISAL

In the review of SCDC's responses to consultation comments on the sustainability assessment and Reviewed Core Strategy many of the responses are inadequate and many simply state "No change to SA required" without any attempt to justify why this might be. Given the significance of the core strategy this is not acceptable.

This policy is described as "marginally more sustainable" by virtue of "the creation of a countryside park on the Foxhall tip by the end of the plan period". The reference to the Foxhall Tip is contradicted in the last paragraph where it states that designated areas will need to be safeguarded "by providing open space as part of the housing development at the beginning of the development". Also it is pointed out that "Foxhall Country Park is unlikely to be developed within the plan period". Consequently the policy is not more sustainable than before and in fact is less sustainable since no proposals have been made for any countryside parks at the beginning of the development.

Only the briefest mention is made of the potential impact of increased boating activities on the River Deben. In fact this is a potentially serious problem and has been ignored and passed across to the area action plan. Large boats, and particularly motor boats, have a powerful disturbing affect on feeding birds, and they are a major cause of erosion of the fragile saltmarsh ecosystem. This point has been made several times by NANT and Waldringfield PC and has been consistently ignored.

The document states "There is uncertainty as to when a country park could be delivered at Foxhall tip". The key point is that it will not be in place when any development on the 2,000 houses at Martlesham begins. In spite of this the assertion is still present in the document that these 2,000 houses will have an insignificant impact on the nearby European sites. This will only be the case if mitigation appears at the start of house building, and is very unlikely to happen.

Summary: The document comments about lack of parking in the area limiting the number of people visiting. But this only applies at peak times. For the majority of the time parking is not an issue.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
4050 Object
5 - Methods of assessing European site visitor increases form an increased human population
5.5: Calculations to predict additional visitors to European Sites in the South Sandlings using 2010 visitor survey data

Respondent: Mrs Jennifer Egan [329]  Agent: N/A

Full Text: Dear Sir

I OBJECT to the findings in the revised AA and SA dated August 2011

The issues identified in my previous consultation responses have not be addressed by the revisions in the AA and SA

In addition, the AA is still giving inappropriate weight to out of date and irrelevant data

The South Sandlings Survey and the Deben Visitor Survey have both been acknowledged but then ignored

A new Country Park is going to go where? and at a cost of what? no site has been identified or costed and there is no evidence that if will ever materialise

The LDF should be returned to cabinet for further debate

Yours faithfully
Mrs J Egan

Summary:
The AA is still giving inappropriate weight to out of date and irrelevant data

The South Sandlings Survey and the Deben Visitor Survey have both been acknowledged but then ignored

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

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Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
My wife and I strongly object to the use of the AA and SS documents as meaningful documents as they have proved already to have fundamental faults and therefore errors on and so much emphasis was placed was by Mr Phillip Ridley on these documents when the full Council voted for the LDF.

The fact is it stated there was no public parking at Waldringfield & shows how little research went into their findings and hence we are obliged to write again to you and restate the distance of one kilometre between the houses on the Adastral Estate and the foreshore at Waldringfield would deter residents from going to Waldringfield is naïve or deliberately misleading.

No mention of the use of bicycles, scooters or motorbikes has been made which is a fundamental mistake as many in the estate will use this form of transport. It is also fundamentally wrong to suggest people will not walk one kilometre as most ramblers regularly walk 5 to 8 kilometres without difficulty.

It is shameful that the Planning Department should support the above arguments as it shows little actual knowledge of human reaction!

The fact is it stated there was no public parking at Waldringfield & shows how little research went into their findings and hence we are obliged to write again to you and restate the distance of one kilometre between the houses on the Adastral Estate and the foreshore at Waldringfield would deter residents from going to Waldringfield is naïve or deliberately misleading.

No mention of the use of bicycles, scooters or motorbikes has been made which is a fundamental mistake as many in the estate will use this form of transport. It is also fundamentally wrong to suggest people will not walk one kilometre as most ramblers regularly walk 5 to 8 kilometres without difficulty.
Firstly we wish to complain that the online response system is not sufficiently accessible for members of the general public. Being asked to submit responses within specific sections of two very long documents only works if stakeholders want to make specific comments at these particular points. This system discourages general comments. Splitting the document into sections also means that it is impossible to search comprehensively. In fact, the process is so complicated and time consuming it could discourage stakeholders from making any comments at all.

Also we wish to complain that the website shows 2 conflicting times for the end of the consultation - on one page it states 4.45 pm and on another it states 04.45. This has been brought to the attention of the Chief Executive of SCDC.

Consultation response

NANT OBJECTS to the findings in the revised AA and SA dated August 2011.

The issues identified in our previous consultation responses of January 2011 and subsequent letters to the council have not been addressed by the revisions in the AA and SA.

The latest version of the Appropriate Assessment demonstrates a lack of rigour when presenting "evidence" for assessing environmental risk, some examples:

- It concedes that no data is available on visitor numbers to the nearby Deben Estuary and yet still goes on to draw unfounded conclusions regarding the impact on the area of 2000 houses at Martlesham. New data such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then to a great extent, ignored in the conclusions.

- Although it now acknowledges that there is public car parking Waldringfield it describes this as limited. No car park in the world has an infinite number of parking spaces so that statement is literally correct. However, the car park rarely reaches capacity and is capable of accommodating a significant increase in numbers of visitors.

- Using this incorrect data it draws the erroneous conclusion that visitors would therefore not be able to arrive by car and would have to arrive on foot.

- It further concludes that this means that as long as the houses are more than 1km from the river, the new residents will not visit the river, therefore there will be no impact on the Internationally Protected Deben Estuary.

- It relies on an out of date 2006 study from Dorset to make the 1 km assumption even though later studies produced in 2008 and 2009 draw quite different conclusions as does the South Sandlings Survey.

- It states that there are breaches in the sea wall and therefore people can not go for circular walks and disturb the over wintering birds and other wildlife. Yes there are breaches, but at greater distances from Waldringfield than stated in the AA. In fact these are precisely at the area best known for over-wintering birds. The Deben Estuary Survey shows that many people use Waldringfield as the starting point for riverside walks.

- It states that there are limited parking spaces in the car park and therefore can not go for circular walks and disturb the over wintering birds and other wildlife. Yes there are breaches, but at greater distances from Waldringfield than stated in the AA. In fact these are precisely at the area best known for over-wintering birds. The Deben Estuary Survey shows that many people use Waldringfield as the starting point for riverside walks.

- Some of the proposed mitigation relies on the as yet undefined green space to the north of Ipswich, and/or the conversion of the Foxhall tip to a country park, which elsewhere is highlighted as being undeliverable during the lifetime of the LDF.

- The AA concludes that because of the limited information on visitor numbers, and therefore the inability to assess the impact of the 2000 houses at Martlesham, a full visitor survey should be commissioned by others in order to determine appropriate mitigation. That makes sense - it then states that this is not necessary for the core strategy. This might apply if the LDF was a true "strategic" document. However, the authors of this Core Strategy have decided to include detailed site-specific housing allocations within the LDF, it is therefore essential, logical and fair that site-specific, deliverable mitigation is correctly determined before progressing any further.

On the basis of the significant anomalies and inaccurate information within the AA and the SA, the LDF should be returned to the cabinet for further debate.

Janet Elliot  
Mill Cottage  
Mill Road  
Waldringfield 
IP12 4PY

On behalf of the 4000+ supporters of NANT

Summary: It concedes that no data is available on visitor numbers to the nearby Deben Estuary and yet still goes on to draw unfounded conclusions regarding the impact on the area of 2000 houses at Martlesham. New data such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then to a great extent, ignored in the conclusions.
4322 Object

5 - Methods of assessing European site visitor increases

5.5: Calculations to predict additional visitors to European Sites in the South Sandlings using 2010 visitor survey data - None

Change to Plan

- Change to Plan

- Not Specified

- Not Specified

- Not Specified

- Not Specified

- None

Attachments:

- full text

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
3919 Object
5 - Methods of assessing European site visitor increases Table 8 form an increased human population

Respondent: Mr Jonathan Ruffle [2578] Agent: N/A

Full Text: I am pleased to see that the Sandlings survey (not undertaken by SCDC) has been worked through to give a near 10% increase in visitors.

However, if it was possible to do this, why was a survey on similar lines (I believe it copied the Sandlings methodology) conducted in the Deben AONB within the last six months not extrapolated in a similar fashion?

Luckily the conclusion of 6.2.35 gives us the useful information that visitor numbers at the Deben would double.

More detailed work provoked by this discovery would probably uncover higher figures - which is probably why it wasn't undertaken.

Summary: I am pleased to see that the Sandlings survey (not undertaken by SCDC) has been worked through to give a near 10% increase in visitors.

However, if it was possible to do this, why was a survey on similar lines (I believe it copied the Sandlings methodology) conducted in the Deben AONB within the last six months not extrapolated in a similar fashion?

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Attachments:
4317  
Comment

5 - Methods of assessing European site visitor increases  
Table 8  
form an increased human population

Respondent:  Suffolk Wildlife Trust (Mr James Meyer) [2605]  
Agent:  N/A

Full Text:  
RE: Consultation on Updated Sustainability Appraisal and Appropriate Assessment Documents (August 2011)  
Thank you for consulting us on the updated Sustainability Appraisal and Appropriate Assessment documents which support Suffolk Coastal District Council's Core Strategy document. We have the following comments:  
Updated Appropriate Assessment (August 2011)  
We are pleased to note that the Council and their consultant have sought to address several of the issues that we have raised previously regarding the Appropriate Assessment, mostly recently in our letter of 7th July 2011. The amendments which have been made to the document, in particular the changes to Table 8; the clarification of the level of use of Natural England Site of Special Scientific Interest (SSSI) condition assessments in the assessment of European (Natura2000) sites condition and the clarification of the inconsistency relating to car parking at Waldringfield, substantially address our concerns over inaccuracies in the Appropriate Assessment report. We also welcome the extra information which has been provided regarding the level and detail of mitigation measures required to ensure that the implementation of policies in the Core Strategy do not have significant adverse effects on sites of European nature conservation importance.  
However, whilst the scope of the mitigation measures proposed in the Appropriate Assessment may prove adequate to assess that the implementation of Core Strategy policies will not have a significant adverse impact on European sites, we maintain our concern about how the proposed mitigation recommendations will be incorporated into Core Strategy policy. It is vital that appropriate wording is included within the Core Strategy policies to enable the implementation and maintenance of the necessary mitigation measures.  
Updated Sustainability Appraisal (August 2011)  
Non-Technical Summary Paragraph 1.2; bullet 6 - We note that this paragraph recognises the need for the creation of a country park or other similar high quality provision in the north Ipswich area as mitigation for the proposed housing growth. However this paragraph also states that this provision is not part of any mitigation requirements. We disagree with this statement as the provision of these measures is integral to mitigating the impact of increased recreational pressure on sites of European nature conservation importance.  
Section C; Policy SP20 Ipswich Policy Area - The assessment of policy SP20 recognises the need to provide mitigation for impacts on the Deben Estuary Special Protection Area (SPA) and states that this will be achieved through the provision of "...open space as part of the housing development at the beginning of the development (because Foxhall Country Park is unlikely to be developed within the plan period)...". However, no reference is made to the need to mitigate the impacts on the Sandlings SPA which will result from the new development in this area. As recognised in the updated Appropriate Assessment (e.g. para. 7.2.10) the provision of a new country park or similar high quality facility is necessary to mitigate the impacts on both the Deben Estuary SPA and the Sandlings SPA. Such a facility should therefore be delivered at the same time as the new development, or preferably in advance of it.  
We hope the above is helpful, if you wish to discuss these matters further please do not hesitate to contact us.

Summary:  
The amendments which have been made to the document, in particular the changes to Table 8; the clarification of the level of use of Natural England SSSI condition assessments in the assessment of Natura2000 sites condition and the clarification of the inconsistency relating to car parking at Waldringfield are necessary to mitigate the impacts on both the Deben Estuary SPA and the Sandlings SPA. Such a facility should therefore be delivered at the same time as the new development, which will result from the new development in this area. As recognised in the updated Appropriate Assessment (e.g. para. 7.2.10) the provision of a new country park or similar high quality facility is necessary to mitigate the impacts on both the Deben Estuary SPA and the Sandlings SPA. Such a facility should therefore be delivered at the same time as the new development, or preferably in advance of it.  
We hope the above is helpful, if you wish to discuss these matters further please do not hesitate to contact us.

Change to Plan

Not Specified  Not Specified  Not Specified  Not Specified  None

Attachments:  LETTER

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
In 5.6.2 it is quite unrealistic to use data from a 6 year old study on Dorset heathland to measure and make conclusions to the Suffolk Coastland. NANT found in its survey that people would drive miles to get to the water and walk for miles having got there. The draw of a river/estuary environment is very strong.
5 - Methods of assessing European site visitor increases
form an increased human population

5.6.4 concludes that people won't drive more than 8km or walk more than 1km which is quite wrong and VERY misleading
3920 Object
5 - Methods of assessing European site visitor increases 5.6: Impact on specific sites form an increased human population

Respondent: Mr Jonathan Ruffle [2578]  Agent: N/A

Full Text:

It is stated in 5.6.4 that no one will walk further than 1km or drive more than 8km.

In the main this evidence only really comes from studies made in Dorset six years ago (although there is a brave attempt to point up the similarities in the Sandlings survey). The areas studied in the Dorset are so dissimilar to this locality geographically, socially and economically as to render the data almost useless.

Also -- What about the vast numbers of people who are being encouraged to travel by bike? They have been ignored in these calculations, as has the encouragement people have been getting to walk greater distances since the Dorset report was published six years ago.

Summary:

Outdated inappropriate evidence is used to support over-rigorous definitions of distance driven or walked.

This area has strong attractions that would get the laziest out and about.

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Attachments:
Appropriate Assessment for Core Strategy (August 2011)

3965  Comment
5 - Methods of assessing European site visitor increases
5.6: Impact on specific sites
form an increased human population

Respondent: Bawdsey Parish Council (Mrs Heidi Grant) [2433]  Agent: N/A

Full Text: This document is full of pseudo-scientific statistics that do nothing but conceal facts. For instance, it is clearly absurd to argue that you can place thousands of houses between Martlesham and Waldringfield and this will have no impact on the River Deben because percentage wise this is a small fraction of the population of Ipswich.

This point is finally conceded in Section 5.6.7 (page 26) but no attempt is made to recalculate the tiny figures presented in Table 5 (page 17).

Emphasis has been put on the damage to European Wildlife sites, but to reach these sites visitors have to use roads. The impact on local residents of the increased visitor traffic was not addressed in the last survey and has not been addressed in this one.

Creating green spaces for new housing developments will not stop people flooding to the beach and water in the summer months (6.6.3 & 7.2.9 - 7.2.17)

Mitigation (section 7)
This section is full of very strange logic; Section 7.2.8 Paragraph 2 (Page 45) claims two-thirds of people visiting a site will travel up to 3.2km to get there. However, in section 7.2.6 it claims you only have to put houses 1km away from the River Deben to stop significant visits.

Even more surprisingly it claims people will not travel 1km to the River Deben because they will be travelling to the new Country Park, location unknown but possibly to the North or North-East of Ipswich, a distance almost certainly greater than 5km. Is SCDC up to enforcing this and who is to say that this strategy will work?

Comments from Bawdsey Parish Council Continued:
An up-to-date, accurate survey is vital to show current visitor and traffic numbers on our part of the coast in the summer.

Suggested New Mitigation Statements (Section 7)
1. No new developments should be within 3km of an SPA. (Explanation: figures of 1km are too low and only cover Rivers Deben and Orwell.)
2. No new development should be visible from anywhere within an envelope up to 100m around an SPA. For example, for up to 100 meters from the bank of the River Deben it should not be possible to see any new developments (including roofs) on either side of the River. (Explanation: this report only considers the impact of people travelling from the new developments to the site. We contend that a site is also damaged if the view from these sites is altered/damaged.)

Summary: This document is full of pseudo-scientific statistics that do nothing but conceal facts. For instance, it is clearly absurd to argue that you can place thousands of houses between Martlesham and Waldringfield and this will have no impact on the River Deben because percentage wise this is a small fraction of the population of Ipswich.

This point is finally conceded in Section 5.6.7 (page 26) but no attempt is made to recalculate the tiny figures presented in Table 5 (page 17).

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Attachments: full text

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Please see below my comments and reasons for my strong objection to the allocation of 2000 homes on the land owned by BT (and others) adjacent to Adastral Park. These are based on my opinion that the Appropriate Assessment is flawed in its methodology and illogical in the conclusions it draws.

The Habitats Directive Article 6(3), contains two important requirements: (a) that any plan or project which is likely to have a significant effect on a Special Area of Conservation must be the subject of an appropriate assessment by a competent national authority; and (b) that the authority may only approve the plan or project when it has ascertained that there will be no adverse effect on the SAC. Specifically it states:-

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

It is my opinion that the August 2011 revision of the Appropriate Assessment fails to demonstrate that the BT site allocation will not have an adverse effect on the SACs in the surrounding area for the following reasons:-

1) The previous version of the AA took into account the data contained in the survey of visitors to the Sandlings area to the NE of Woodbridge. This looked at visitor numbers from a wide area, including for example Ipswich, the IPA portion of SCDC, and the Felixstowe area, and drew conclusions about the degree of impact on that Sandlings area. However the AA went on to draw conclusions about the impact, or otherwise, of the proposed developments (including the BT site) on the SACs in the vicinity of the BT site, despite the fact that there was no data to justify this conclusion, and was based erroneous information about car parking for members of the public at the locations which would give access to the Deben SACs (the AA said there was none, whereas in fact there is at all the relevant locations).

2) The revised August version of the AA has now corrected these errors and makes reference to the small scale study carried out by NANT (which shows that there will be a risk that increased visitor numbers will have an adverse effect on the SAC). However these revisions to the document do not address the continuing fundamental issue that no substantive data is available to assess the degree of risk. Para 9.2 points to the need for further studies.

3) The previous version used the absence of car parking as part of its justification for saying there was little risk. Now that the latest document states (somewhat grudgingly) that there IS in fact car parking it cannot logically follow that the risk is now no greater than was stated in the previous version.

4) The August AA specifically says in para 7.2.6:-

"Further mitigation to reduce harm, as described in paragraphs 7.2.7 - 7.2.15 below remains to be required. A planning application Appropriate Assessment would be needed to look at site- and plan-specific issues. Natural England advised in its email of 15th February 2011 to Suffolk Coastal District that it believes 'that any adverse effects on N2K sites could be mitigated by the use of planning conditions/obligations/legal agreements (S106) to allow us to conclude no adverse effect on integrity. Suitable strategies are detailed in our letter to SCDC of 12 February 2010 which could be employed following AA at project level.'"

The AA also states in para 7.2.8

"The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites"

At the present time there is no information publicly available to demonstrate that there ARE any viable and effective mitigation solutions which are realistically deliverable in the timescale to meet the requirement set out in para 7.2.8. The amount of green space available on the BT site will be very limited for many years due to the mineral extraction programme. The only other nearby site which has been mentioned is the conversion of the Foxhall landfill site into a country park. This site has just completed a programme to line out and prepare capacity for another 300,000 cubic
The previous version of the AA took into account the data contained in the survey of visitors to the Sandlings area. This looked at visitor numbers from a wide area concluded the degree of impact on that Sandlings area. AA went on to conclude about the impact, or otherwise, of the proposed developments on the SACs in the vicinity of the BT site, despite the fact that there was no data to justify this conclusion, and was based erroneous information about car parking (the AA said there was none, whereas in fact there is at all the relevant locations).

Summary:

5) If, despite all the reservations and concerns expressed above, SCDC go ahead and approve the LDF and subsequently take the BT application to planning committee, SCDC should publicly assure its residents that approval WILL NOT be given unless and until substantive and deliverable mitigation measures are identified which are a) evidence based using real visitor data and b) deliverable in the timescales set out in the AA. These are issues which should not be swept under the carpet for later assessment as by then it will be too late to reverse any consents given.

Yours faithfully

Stephen Denton
I object to the revised sustainability appraisal and appropriate assessment of the core strategy on the grounds that there are a large number of errors in the document. I highlight the main ones below.

APPROPRIATE ASSESSMENT

Table 3 estimates the increase in population as a result of the proposed housing. It takes a value of 1.57 as the number of new people per dwelling. No justification is provided for this value. Since the total number of people arising from these houses is a key input to this report this is unacceptable. Either this number is justified or a much higher number assumed to provide a margin of error. In any case the conclusions based on this value are suspect and should be identified as such. Further on in the document it states that the low figure of 1.57 is due to an unstated assumption that roughly one third of the future residents of any new housing will move out of existing housing in the area and hence will not be adding to the number of extra people living near the sensitive sites. This is an unproven assertion and again any conclusions based on this should be removed unless it can be proven or justified.

The document comments about lack of parking in the area limiting the number of people visiting. But this only applies at peak times. For the majority of the time parking is not an issue.

The document states "Estuary-side footpaths north and south of Waldringfield are eroded and impassable ... This limits the walking routes available from Waldringfield." This is true but does not mean that no one will ever use the path. It is still used along its navigable part.

Having acknowledged that the data is poor, the assessment makes the unsupportable claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." Since a major planning decision is being made on this evidence it beggars belief that the council can ignore this fundamental weakness. There appears to be no intention of obtaining any further evidence either. Is this because it might actually contradict the conclusions of this assessment?

No change has been made to the conclusions which the assessment reaches regarding mitigation: "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This is only true if mitigation is actually implemented and is available at the start of house building. There is no mention of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

The impact of extra people visiting the Waldringfield area is discussed in the document. There has been no alteration of the unsubstantiated claim that people are unlikely to walk further than 1km or drive further than 8km. These claims are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed. The 1km figure is invalid because:

- the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
- the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing.
- the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
- the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. This was confirmed by a study made by NANT, which showed that people walked an average of 3.8km to the Deben Estuary.
4026  Object

5 - Methods of assessing European site visitor increases  5.6: Impact on specific sites
form an increased human population

Although the document admits that there is only a small amount of data regarding visitor numbers to sites in Europe it goes on to draw a significant number of important conclusions from this data. This is a flawed approach and requires either more data to substantiate the claim or that the conclusions drawn be removed from the document.

Finally the true increase in the number of people visiting the sites cannot be given because the current number of visitors is unknown as no accurate survey has been undertaken.

SUSTAINABILITY APPRAISAL

In the review of SCDC's responses to consultation comments on the sustainability assessment and Reviewed Core Strategy many of the responses are inadequate and many simply state "No change to SA required" without any attempt to justify why this might be. Given the significance of the core strategy this is not acceptable.

This policy is described as "marginally more sustainable" by virtue of "the creation of a countryside park on the Foxhall tip by the end of the plan period". The reference to the Foxhall Tip is contradicted in the last paragraph where it states that designated areas will need to be safeguarded "by providing open space as part of the housing development at the beginning of the development". Also it is pointed out that "Foxhall Country Park is unlikely to be developed within the plan period". Consequently the policy is not more sustainable than before and in fact is less sustainable since no proposals have been made for any countryside parks at the beginning of the development.

Only the briefest mention is made of the potential impact of increased boating activities on the River Deben. In fact this is a potentially serious problem and has been ignored and passed across to the area action plan. Large boats, and particularly motor boats, have a powerful disturbing affect on feeding birds, and they are a major cause of erosion of the fragile saltmarsh ecosystem. This point has been made several times by NANT and Waldringfield PC and has been consistently ignored.

The document states "There is uncertainty as to when a country park could be delivered at Foxhall tip". The key point is that it will not be in place when any development on the 2000 houses at Martlesham begins. In spite of this the assertion is still present in the document that these 2,000 houses will have an insignificant impact on the nearby European sites. This will only be the case if mitigation appears at the start of house building, and is very unlikely to happen.

Summary: There has been no alteration of the unsubstantiated claim that people are unlikely to walk further than 1km or drive further than 8km. The 1km figure is invalid because:

- the Deben Estuary is a different habitat from Dorset
- the pattern of housing in surrounding areas is different
- the Dorset heathland sites lack features comparable
- the Dorset study is 5 years out of date and has been superseded

Many people will walk further than 1km to reach an area like the River Deben. This was confirmed by NANT's study, showing that people walked an average of 3.8km to the Deben Estuary.
I OBJECT to the Findings of the Appropriate Assessment as I consider the proposed development of Adastral Park in the East of Ipswich Policy Area plus kindred developments in Ipswich are bound to have a significant, negative effect on the River Deben part of the AONB and it associated SPA and SAC designated under the Ramsar Convention in contravention of PPS9.

Data from Suffolk Coasts & Heaths AONB 2004 is out of date and seems inapplicable. Common sense suggests that a significant proportion of the 4,500 or so new residents in the 2,100 new homes will introduce about 2,000 motor vehicles that a significant proportion of the residents will use to try to reach the Waldringfield road head in the hope of parking (see 5.3.23.3) during their recreation. A substantial number of them may well bring boats to launch on the Deben. As the Foxhall Country Park is likely to be delayed and will anyway be to wrong side of the A12, so many will acquire the habit of seeking recreation on or beside the Deben with Waldringfield as a focal point. 5.3.26 is a false assumption.

I OBJECT to the Findings of the Appropriate Assessment as I consider the proposed development of Adastral Park in the East of Ipswich Policy Area plus kindred developments in Ipswich are bound to have a significant, negative effect on the River Deben part of the AONB and it associated SPA and SAC designated under the Ramsar Convention in contravention of PPS9.
### 4251 Object

**5 - Methods of assessing European site visitor increases**  
5.6: Impact on specific sites form an increased human population

**Respondent:** Mrs Ruth Lubbock [1752]  
**Agent:** N/A

**Full Text:**

Please note that I still object to the proposed loss of agricultural land.

AA paragraph 5.3 The low figure of 1.57 residents per house is not convincing; if there is work available this denoted families.

5.6 Healthy people regularly walk more than 1km. The proposed site is within easy walking distance of Waldringfield, and therefore likely to cause disturbance to wildlife.

**Summary:**

5.6 Healthy people regularly walk more than 1km. The proposed site is within easy walking distance of Waldringfield, and therefore likely to cause disturbance to wildlife.

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**Attachments:**

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Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I object to SCDC accepting (and paying Landscape Partnership for) this AA while it is such a shoddy piece of work. It does not consider the results of the NANT Visitor Survey, which shows that the 1 km visitor boundary is nonsense.
Although a few changes have been made to the AA and SA documents, there remain several serious flaws.

1. The assessment of increased visitor impact appears still to be based on a survey carried out in 2004.

2. A limited number of Land Managers were consulted and their evidence was generally anecdotal.

3. A survey of an area of heathland in Dorset was used to help predict visitor patterns - this is too different a scenario for any valid conclusions to be drawn.

4. The total increase in population from all the development plans does not seem to have been factored in when considering the increased visitor impact on the European sites. By this I mean the proposed developments at Martlesham, Felixstowe and the Ipswich Borough Council area.

5. A Country Park is proposed to help to alleviate pressure on the European sites, this is supposed to be available for use before the proposed developments get underway. However the only site put forward is Foxhall Tip, which, it is stated further on the same document, will not be available for many years. A clear contradiction.

Summary:
A limited number of Land Managers were consulted and their evidence was generally anecdotal.
5 - Methods of assessing European site visitor increases from an increased human population

4083

Comment

5.7: Survey of site managers opinion of impacts of additional visitors

Respondent: Waldringfield Parish Council (Mrs Jean Potter) [509]
Agent: N/A

Full Text:

Á§5 Methods of assessing European site visitor increases from an increased human population

Point 1, Summary:
There is no up to date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites or concerns to the Appropriate Assessment. Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"There is a limited amount of data regarding the quantity of visitors to European sites" (Á§5.1.10) Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available, and can be used to predict increases in visitor numbers from new housing." (Á§5.1.10). This survey covers the AONB as a whole. It makes no mention of the Deben Estuary SPA/SSSI/RAMSAR Site. Neither does it mention the other SSSIs near to Adastral Park (Newbourne Springs, Ipswich Heaths and Sink Valley, Kesgrave), because they are not in the AONB. The only interview locations on the River Deben are at Melton and Bawdsey, which are irrelevant to the proposed housing at Adastral Park and Felixstowe. All the interviews were conducted in August, none in spring, autumn or winter. These facts make the AONB 2004 survey completely irrelevant to any prediction of increases in visitor numbers from new housing. In particular, the phrase "can be used to predict increases in visitor numbers from new housing" refers to visitors to the European Sites potentially affected, as listed in Á§2.1.2. In Á§2 (European sites potentially affected) it makes no mention of the AONB.

Throughout Á§5.3 (Calculations to predict additional visitors to European sites across the Suffolk Coast and Heaths AONB using Tourist Board data) the distinction between the AONB and the European Sites is regularly confused. For example:

* in Á§5.3.5 it says: "Many of the sites in the AONB involved in the visitor study were European sites, so the study is relevant to this Appropriate Assessment." The AONB (2004) study makes no mention of (and certainly does not 'involve') any environmentally designated sites, European or otherwise.

* in Á§5.3.21 it says: "...roughly one-quarter of all visits to the AONB originate from Ipswich Borough and Suffolk Coastal District. This assumption is also applied to the European sites within the AONB." On what basis is this assumption also applied to European sites within the AONB?

* in Á§5.3.18 it says: "Table 6 shows that the increase in visitors to the Suffolk Coast and Heaths AONB, as a result of the proposed developments is predicted to be 2.83%." In Á§5.3.25 it says: "To allow for these assumptions, the approximate 2.83% increase in total visitors to the AONB is given as a range of 2% - 5%." (our emphasis). Both of these refer to the AONB, not any European Site or Sites. But then in Á§5.3.26 it says: "it would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% ..." No justification is given for jumping from a conclusion about visitors to the AONB to one about visitors to European Sites.

Not only is there a confusion between the AONB and European sites within the AONB, but no attempt is made in Á§5.3 to distinguish between individual European Sites. For example, the Deben Estuary SPA is obviously more likely to receive a greater increase in visitors due the proposed housing at Adastral Park than more northerly sites such as the Minsmere-Walberswick SPA, but this is not mentioned. (The discussion of the South Sandlings Survey in Á§5.5 rectifies this for the European Sites within the survey area, but of course this does not cover the Deben Estuary, and it does not clarify the confusions in Á§5.3.)

Point 2, Summary:
The estimate of the net increase in people for the East Ipswich Plan Area, based as it is on 1.57 new people per dwelling, is a serious under-estimate. The figure of 1.57 comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. It contains the absurd hidden assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding. There is no evidence that there is any overcrowding in these villages.

In Á§5.3.7 to Á§5.3.13, and particularly in Table 3, an attempt is made to estimate the increase in population due to the proposed housing. To do this it uses the 'number of new people per new dwelling', which in Suffolk Coastal is supposed to be 1.57. This is more realistic than the previous figure of 0.9, but is still seriously flawed. It comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. According to the Oxford Economics Study the occupancy rate in the East was 2.31 (in 2009) decreasing to 2.22 (in 2027), giving an average of 2.27. (p34)

In Á§5.3.9 the figure of 1.57 is explained: "This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy." It is extremely unlikely that any of the 2,000 dwellings proposed for Adastral Park will be bought for holiday homes, so the difference between the 4,540 (2,000x2.27) new occupants and the 3,140 (2,000x1.57) new people to the area must be accounted for by assuming that 1,400 (4,540-3,140) people will move to Adastral Park because of the fragmentation of multiple person households in the area, and so will not be adding to the number of extra people living near the Deben Estuary. This dubious assumption is not explained or even mentioned, let alone properly justified. It is in fact totally implausible: In order for an occupant of the new housing at Adastral Park not to count as a 'new' additional person, he/she must:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
1. move to Adastral Park from somewhere at least equally near the Deben Estuary (approximately)
2. move out of a multiple person household into one with the same or lower occupancy at Adastral Park
3. not be replaced by anyone moving into the area from further afield
4. not be part of a house-moving chain involving anyone moving into the area from further afield

The only places that qualify for inclusion in (1) are: Waldringfield, Newbourne, Hemley, Brightwell, Martlesham Village and Martlesham Heath (just). Kesgrave and Grange Farm are roughly twice the distance from the Deben Estuary so can be excluded, and Woodbridge can be excluded because although it is on the River Deben, it is not on a sensitive part: "the Deben Estuary is not assessed by Natural England as being unfavourable due to human disturbance" (AS6.2.35). The combined populations of these 6 villages is 6,630, so the Appropriate Assessment contains the absurd hidden assumption that 1,400 (21%) of the residents of these villages will move to Adastral Park because of pressures of overcrowding. There is no evidence that there is any overcrowding in these areas, or that there is any desire for the residents to move to the proposed housing at Adastral Park - the idea is quite ludicrous.

The upshot of this is that the figure of 3,462 for the 'Estimated net increase in people' for the East Ipswich Plan Area, (Table 3), based as it is on 1.57 new people per dwelling, is a serious under-estimate. It is far more likely that the entire population of the 2,000 new houses at Adastral Park will come from outside the immediate area, and will be about 4,540 (2,000x2.27). The same criterion can be applied to the Felixstowe, Walton and the Trimleys figure of 2,763 (Table 3).

Point 3, Summary:
The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing the upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.

The actual increase in the number of people visiting the sites is not given, because the current number of visitors is unknown (because of the lack of a proper survey - see above).

The assumptions given in AS5.3.14 are all highly dubious (except one):
1. * "the proportional increase in the number of day visitors is similar to that of the existing population" This is very unlikely.
2. * "the proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries.*
3. * "the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey" It is not clear if 'sites' is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.
4. * "an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity" OK, this is an acceptable assumption.
5. * "the relative proportions of day visitors and overnight visitors does not change" Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase.
6. * "the summer snapshot survey is typical of visitors all year round." This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to - be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

Table 4 (AS5.3.13), second column reads 'Estimated increase in people (table 2)'. The data is actually taken from Table 3.

Table 5 (AS5.3.16), second column reads 'proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1.' The data is actually taken from Table 2.

The calculations in Table 5 and described in AS5.3.15 are an attempt to predict the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as stated in the title of Table 6. However, in several places the restriction (in bold above) is not made clear, for example in AS5.3.14-16. This gives the impression that it predicts the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from all potential sources. 50.5% of the total day visitors to the AONB come from outside Suffolk Coastal and Ipswich Borough/Pinewood. Increases in the populations in the areas these people come from have been excluded from the calculations. This is unrealistic - Babergh, Tendring, Waveney and all the other nearby districts all have LDF Core Strategies that propose large housing allocations and correspondingly large increases in populations. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as described in AS5.3.15 and shown in Table 5, is logically flawed. Column A only includes day visitors who live in Suffolk Coastal and Ipswich Borough/Pinewood. In Column B this is multiplied by the proportion of visitors who are day visitors (55%). However, the figure of 55% applies to visitors from all locations, not just those from Suffolk Coastal and Ipswich Borough/Pinewood. Common sense tells us that local visitors are more likely to be on day trips than those coming from further afield, and this is confirmed by comparing Map3 (p11) with Map 4 (p12) in the Suffolk Coast and Heaths AONB Survey (2004). It is therefore reasonable to assume that a far larger value than 55% should be used as the multiplier in Column B (the data shown in the Suffolk Coast and Heaths AONB Survey (2004) isn't sufficiently detailed to tell us what the value should be.) In fact it would be much more realistic to have different multipliers for the different areas - for example we know that about 95% of visitors to Martlesham are on day trips (Suffolk Coast and Heaths AONB Survey (2004) Chart 3), so if most of these came from...
Comment

5 - Methods of assessing European site visitor increases form an increased human population

5.7: Survey of site managers opinion of impacts of additional visitors

the East Ipswich Plan Area we could use 95% as the multiplier in Column B, 2nd row.

Two of the three assumptions given in Â§5.3.23 are highly dubious:

* "'New' people in the Borough / District will have the same visiting pattern as 'existing' people" This is very unlikely - see comments on Â§5.3.14, first bullet point

* "Visits by holiday makers will not be affected by any increased use by local visitors" It is possible that overcrowding at popular sites will put off holidaymakers. Holiday makers generally want to visit unspoiled countryside; the urbanisation resulting from the housing allocations, particularly at Adastral Park, is very likely to deter holidaymakers.

* "Sites, including their car parks, will not constrain the number of visits by becoming 'full' and turning away visitors" OK, this is an acceptable assumption.

The uncertainties in the calculations are acknowledged by the vagueness of the conclusion (Â§5.3.26): "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% as a result ..." It would also be reasonable to assume that the increase is far higher than 5%. What justification is there for choosing 5% as the upper limit rather than, say, 10%? The flaws in the methodology, the likelihood that the assumptions in Â§5.3.14 and Â§5.3.23 are invalid, and the inappropriateness of using the Suffolk Coast and Heaths AONB Survey (2004) results in the first place all combine to make this conclusion completely worthless.

Point 4, Summary:
The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the proposed new housing in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area than the average across the AONB. One would expect the increase in the Orwell and Deben Estuary SPAs to be far greater than the 8.8% estimated for the South Sandlings area. Nowhere is this obvious conclusion stated.

Another reason the figure of 2-5% is worthless is that it is an average across the whole of the AONB. 77% of the proposed new housing is in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area, all of which are far closer to the Orwell and Deben Estuaries than the other European Sites in the AONB, and these sites will therefore receive a far greater increase in visitors than the average across the whole of the AONB. Even if the figure of 2-5% is correct it tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs. This point is made in Â§5.8.1 with regard to the South Sandlings area "Fewer people living in or east of Ipswich might visit distant parts of the AONB compared to the South Sandlings, thus having a smaller impact over the AONB", but unfortunately the obvious extension of this argument to the Deben and Orwell Estuaries hasn't been made.

"It is a reasonable assumption that an increase in dwellings would generate a proportionate increase in visitors from any particular distance band. For example, if the number of houses doubled in a particular distance band the number of visitors from that area would also double" (Â§5.5.6). We agree with this. It is a pity that this logic can't also be applied to the impact on the Deben Estuary of the 2,000 houses proposed for Adastral Park. The calculation method described in Â§5.5.9 and Â§5.10 seems to be far more realistic than those used in Â§5.3 (criticised above), and there seems to be no good reason why it couldn't also be applied to the Adastral Park - Deben Estuary situation if basic data on visitor numbers were known.

"The distribution of proposed housing is not precisely specified within the Core Strategies." (Â§5.5.7) This is not entirely true. One of our main complaints about the SCDC LDF Core Strategy is that it is very site-specific. 2,000 houses 'to the south and east of Adastral Park' could hardly be more site-specific.

In Â§5.5.12 the increase in the number of visitors to the South Sandlings area as a result of the Ipswich and Suffolk Coastal Core Strategies is predicted to be 8.8% (broadened to 6-12% in Â§5.5.14). Most of the housing proposed in these Core Strategies is far nearer to the Deben Estuary than it is to the South Sandlings area, so one would expect the increase in the number of visitors to the former to be far greater than 8.8%. Nowhere is this obvious conclusion stated.

(No estimate is given for the increase in the number of visitors to the Deben Estuary as a result of the Ipswich and Suffolk Coastal Core Strategies, which is a pity as this is the SPA most affected by the extra housing.)

Point 5, Summary:
The claim that people are unlikely to walk further than 1km is absurd. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.

Throughout Â§5.6 various references are made to the ridiculous claims that people are unlikely to walk further than 1km or drive further than 8km. For example: "...only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur..." (Â§5.6.6). These are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed.

The 1km figure is invalid because:

1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked less than 1km was that they lived less than 1km from the site, so didn't need to walk further.
3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

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The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. The inappropriateness of the 1km figure is borne out by the Deben Estuary Survey, which shows that 57.1% (far more than the 11% in Dorset) of visitors to the River Deben who arrived on foot walked more than 1km (Deben Estuary Survey, A§2.19). The average distance travelled by people on foot (3.8km) easily puts the Deben Estuary SPA within the orbit of the proposed LDF Core Strategy site at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption.

"The allocation east of Ipswich around Martlesham would be close to the Deben Estuary SPA" (A§5.7.6.7). The allocation east of Ipswich around Martlesham is close to the Deben Estuary SPA - it is 1.8km away (as the crow flies). The use of the term 'could be' is disingenuous - it implies there is some leeway in where the housing goes, which isn't the case. The LDF Core Strategy specifies 'To the south and east of Adastral Park' which can only mean one thing - BT's land (see BT's planning application C09/0555).

The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings" (A§5.8.5). Whilst this is factually correct, its significance is questionable, as the Deben Estuary Survey did not cover the winter period, so it simply asked interviewees if they also visited in the winter. The Deben Estuary visitor survey... does not have the data or analysis to predict changes in visitor numbers" (A§5.8.8). This is partly true, a more comprehensive survey carried out by professionals would be needed for that. The survey says: "We hope that the data we have collected is helpful in providing some baseline information from which further studies can be conducted or more realistic projections made regarding increased visitor numbers resulting from the Adastral Park, Martlesham development and the consequent impact on the wildlife." (Deben Estuary visitor survey, A§1.9). The point is that the Appropriate Assessment makes predictions of increases to visitor numbers without any data on current visitor numbers, so although the Deben Estuary visitor survey isn't scientifically rigorous, it is better than nothing. A§6.2 Policy SP2. Housing numbers

Point 6. Summary: The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The conclusion that it is unlikely that many visitors would walk from their homes to the Deben Estuary SPA at Martlesham, and that it is expected there will be no new high levels of disturbance, are based on the flawed assumption that people won't walk more than 1km and an unrealistic reliance on greenspace provision.

"...the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk". There is nothing wrong with the estuary-side path, it is perfectly walkable for about 2.5km up to the breach opposite Methersgate Quay.

We agree with most of A§6.2.28, although the location of the proposed housing is known precisely - it is 'To the south and east of Adastral Park' see comments on A§5.6.7. above. We agree with the conclusion in A§6.2.30: "It therefore cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA near Martlesham". However, this is then contradicted in A§6.2.31: "Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the greenspace provision is adequate, it is unlikely that many visitors would walk from their home to the estuary, so this recreational activity would not substantially increase on the foreshore of Deben Estuary SPA at Martlesham, and there is expected to be no new high levels of disturbance...". The assumption that people won't walk more than 1km is invalid (see our comments on A§5.6.7 above), and the reliance on greenspace provision is equally flawed (even if the greenspace appears in time, which is doubtful) - see our comments on A§7, below. The Deben Estuary Survey showed that 32% of visitors on foot walked more than 3km to the Deben Estuary at Martlesham (Deben Estuary Survey, A§2.19).

"It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2 - 2.5km from the Martlesham church car park (The Deben Estuary Visitor Survey by NANT of July 2011 gives 2.5km)." (A§6.2.34) It depends on whether this distance is 'as the crow flies' or by the shortest road route. The Deben Estuary Survey actually states them as 1.6km and 3.0km respectively (Deben Estuary Survey, A§3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.2km.

Point 7. Summary: The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren't necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as 'lost due to erosion' is grossly misleading. These paths are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

"This limit to parking suggests that there is limited availability for an increase in visitors arriving by car to Waldringfield...". "Given the limit to available parking the increase in visitors walking along the estuary might be less than that predicted." (A§6.2.35) Obviously the parking space is 'limited', i.e. it isn't infinite! In fact there is space for about 75 cars in the public parking area and about 22 in the patrons only area. However, too much emphasis has been placed on the "limit to available parking" - this only applies at peak times, most of the year there is plenty of space. A letter to the Chair of Waldringfield PC from the manager of the Maybush, dated 16/2/10 says: "...the car park, generally, is not at capacity at any other time than school holidays, bank holidays and weekends. It is however often at capacity during these times out of our hours i.e. before 11am if the weather is fine and/or there is an event on at the sailing club." When the car park is full visitors aren't necessarily deterred - it is common for visitors to park in Cliff Road, and recently in Church Field Car Park, causing extra congestion (Cliff Road is narrow and single lane in places).

"It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2.5 - 3km from the Deben
estuary at Waldringfield (The Deben Estuary Visitor Survey by NANT of July 2011 gives 3km).” (§6.2.35) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 2.0km and 2.5km respectively (Deben Estuary Survey, §3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.1km.

"Estuary-side footpaths north and south of Waldringfield are eroded and impassable, according to data received from Suffolk County Council in August 2011 (see Figure 03). This limits the walking routes available from Waldringfield.” (§6.2.36). Figure 03 shows the footprint extending about 1km north of Manor House and about 1.5km south of the reservoir as ‘Section lost due to erosion’. This is completely untrue and is grossly misleading. In fact the path north of Waldringfield is breached opposite Metershgate Quay about 2/3 of the way along the section shown as ‘lost’, and the path south of Waldringfield is breached just beyond Early Creek, at the southern end the section shown as ‘lost’. In places these paths can get muddy in poor weather, but otherwise are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

Point 8, Summary: The conclusion that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA is based on the invalid assumption that people won’t walk more than 1km, and the unrealistic reliance on greenspace provision.

"It can be ascertained that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA, given a location well over 1km from the estuary and with adequate greenspace provision.” (§6.2.42). This is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on §5.6), and the unrealistic reliance on greenspace provision - see our comments on §7.

"It is therefore concluded that there would be no adverse affect upon the integrity of the respective European sites.” (§6.2.45). Again, this is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on §5.6), and the unrealistic reliance on greenspace provision - see our comments on §7.

Point 9, Summary: No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment.

No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is important because: “On one estuarine site, disturbance to birds from boats was thought to be the biggest problem” (§5.7.6). Motor boats and jet skis, which create a large wake, also contribute to erosion of the river banks, endangering the delicate saltmarsh ecosystem. This is a serious omission from the Appropriate Assessment.

§7 Mitigation

Point 10, Summary: The Appropriate Assessment places great reliance on the creation of a new country park as mitigation. This is despite the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Even if a site is found it will not have any of the attractive features of the Deben Estuary, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

The Appropriate Assessment places great reliance on the creation of a new country park, which it claims will provide mitigation by diverting visitors (and particularly dog walkers) away from the Deben Estuary. No specific site is suggested, although a location vaguely described as “to the north or north-east of Ipswich” is proposed (§7.2.10). However, no mention is made of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

Various wish-lists of desirable features of this mitigating greenspace are presented throughout §7.2. However, the ones that could actually attract visitors away from the Deben Estuary are conspicuous by their absence. Most people who visit the Deben Estuary do so because of the river. They walk along its banks, their children play on the beach and swim in the river, they sail, fish, birdwatch and engage in many other river-based activities, and of course the Maybush at Waldringfield attracts people from far and wide. A country park will not have any of these attractive features, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

There isn’t an abundance of suitable sites “to the north or north-east of Ipswich”. The phrase “to the north or north-east of Ipswich” suggests that it is likely that the site will be west of the A12, and if this is the case then the Deben Estuary will be far more accessible to the residents of the proposed Adastral Park development than the mitigation site, as the A12 presents a significant barrier to walkers.

Following the dubious logic of the Appropriate Assessment, if the mitigating greenspace is more than 1km from the development, visitors are unlikely to walk there. A circle of radius 1km from Adastral Park barely reaches beyond Martlesham Heath to the west or Tesco’s car park to the north, an area that contains no significant candidate spaces, so it is difficult to see where this greenspace could come from. Unless, that is, people are expected to drive to the mitigation site, in which case it won’t have any effect on visitors going to the Deben Estuary on foot, but will increase traffic congestion west of the A12.

Recent evidence from Dorset casts serious doubt on the effectiveness of alternative greenspace in mitigating against increases in visitors to environmentally sensitive sites: “Almost all responding households had some ‘Other’ greenspace within 1.5km. The presence of this ‘Other’ greenspace had no apparent effect on reducing either the likelihood or frequency of visiting heaths... Some of the results suggest that people with more greenspace surrounding their homes may actually visit heaths more... The most critical conclusion is that there appears to be only a slender relationship between the amount of (existing) alternative greenspace nearby and the amount of heathland visits” (East Dorset District Council Public Report - Household Survey, Footprint Ecology, May 2009, p27).

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No change has been made to the conclusions on mitigation (§7.4): “It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site.” This of course depends on the mitigation being implemented and available at the start of house building. However, even if it is, it is highly unlikely that “the impacts of additional housing provisions in Policy SP2 and related policies ... will be reduced to an insignificant level” (§7.4.1). Where is the evidence that this (as yet hypothetical) mitigation will reduce the ‘adverse effect’ to an ‘insignificant level’? The current number of visitors to the European sites isn’t even known, and the increase isn’t known either, so how can it be said with confidence that this increase will be eradicated with appropriate mitigation? It is pure speculation, without any basis in fact.

§8 Conclusions

Point 11, Summary:

Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

"It is concluded that policy SP2 would have an adverse effect upon the integrity of a number of European sites, alone and in combination with the Ipswich Borough Core Strategy and Policies." (§8.6.1). This we do agree with. “Mitigation is proposed which, if implemented, would reduce the adverse effect to an insignificant level and would enable a conclusion that it can be ascertained that there will be no adverse effect upon the integrity of any European site.” (§8.6.1). As explained above, given that no sites or funding have been found, mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. We believe there is no justification for this optimism, and that it is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

§9.2 Further work needed

Point 12, Summary:

It is claimed that further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. Yet it is acknowledged that the data upon which major decisions have been based is poor. No attempt will be made to get better data before the decisions are formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment’s conclusions. This is not how decision making is supposed to work.

“Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected.” (§9.1.1). This decision was made in 2009. If SCDC had instead decided to commission a proper visitor survey at that time, it would probably be complete by now (2 years later), and could have provided a far more reliable basis for assessing the impact of the housing proposed in the Ipswich Borough and Suffolk Coastal Core Strategies. Having acknowledged that the data is poor, the Appropriate Assessment makes the highly dubious claim that: “further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress.” (§9.2.3) So a major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment’s conclusions.

Summary:

No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment.
3921  Object

5 - Methods of assessing European site visitor increases  Table 9
form an increased human population

Respondent: Mr Jonathan Ruffle [2578]  Agent: N/A

Full Text: 5.7.2: The process of gathering of information for this section seems so full of excuses and randomness as to render the whole section redundant.

Summary: 5.7.2: The process of gathering of information for this section seems so full of excuses and randomness as to render the whole section redundant.

Change to Plan

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Attachments:
Although a few changes have been made to the AA and SA documents, there remain several serious flaws.

1. The assessment of increased visitor impact appears still to be based on a survey carried out in 2004.

2. A limited number of Land Managers were consulted and their evidence was generally anecdotal.

3. A survey of an area of heathland in Dorset was used to help predict visitor patterns - this is too different a scenario for any valid conclusions to be drawn.

4. The total increase in population from all the development plans does not seem to have been factored in when considering the increased visitor impact on the European sites. By this I mean the proposed developments at Martlesham, Felixstowe and the Ipswich Borough Council area.

5. A Country Park is proposed to help to alleviate pressure on the European sites, this is supposed to be available for use before the proposed developments get underway. However the only site put forward is Foxhall Tip, which, it is stated further on the same document, will not be available for many years. A clear contradiction.

Summary:

1. The assessment of increased visitor impact appears still to be based on a survey carried out in 2004.
Appropriate Assessment for Core Strategy (August 2011)

3958 Object

5 - Methods of assessing European site visitor increases 5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

form an increased human population

Respondent: Mariah Skellorn [1758]
Agent: N/A

Full Text:
My name is Mariah Skellorn and I OBJECT to the findings in the revised AA and SA dated August 2011.

The issues identified in my previous consultation responses have not been addressed by the revisions in the AA and SA.

- The AA still uses out of date and irrelevant data.

- New data, i.e. the South Sandlings Survey and the Deben Visitor Survey have been acknowledged and then thoroughly ignored in the conclusions.

- The so called "suite of mitigation measures" includes a new country park. No site has been identified or costed for this and there is no evidence that this will materialise.

- On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Summary:
The AA still uses out of date and irrelevant data.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments:
comments from M Skellorn

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I am writing to OBJECT to the findings in the revised Appropriate Assessment and Sustainability Appraisal. The issues I, and others, raised in previous consultation responses are not addressed in either the Appropriate Assessment or the Sustainability Appraisal. The data is flawed (based on a five year-old study in Dorset, an area very different in character from Suffolk); and more recent surveys (South Sandlings Survey, Deben Visitor Survey) have been ignored. There is no detail on the "country park" proposed as a mitigation measure. The LDF needs much more detailed and relevant debate.

Summary: The data is flawed (based on a five year-old study in Dorset, an area very different in character from Suffolk); and more recent surveys (South Sandlings Survey, Deben Visitor Survey) have been ignored.
This document is full of pseudo-scientific statistics that do nothing but conceal facts. For instance, it is clearly absurd to argue that you can place thousands of houses between Martlesham and Waldringfield and this will have no impact on the River Deben because percentage wise this is a small fraction of the population of Ipswich.

This point is finally conceded in Section 5.6.7 (page 26) but no attempt is made to recalculate the tiny figures presented in Table 5 (page 17).

Emphasis has been put on the damage to European Wildlife sites, but to reach these sites visitors have to use roads. The impact on local residents of the increased visitor traffic was not addressed in the last survey and has not been addressed in this one.

Creating green spaces for new housing developments will not stop people flooding to the beach and water in the summer months (6.6.3 & 7.2.9 - 7.2.17)

Mitigation (section 7)
This section is full of very strange logic; Section 7.2.8 Paragraph 2 (Page 45) claims two-thirds of people visiting a site will travel up to 3.2km to get there. However, in section 7.2.6 it claims you only have to put houses 1km away from the River Deben to stop significant visits.

Even more surprisingly it claims people will not travel 1km to the River Deben because they will be travelling to the new Country Park, location unknown but possibly to the North or North-East of Ipswich, a distance almost certainly greater than 5km. Is SCDC up to enforcing this and who is to say that this strategy will work?

Comments from Bawdsey Parish Council Continued:
An up-to-date, accurate survey is vital to show current visitor and traffic numbers on our part of the coast in the summer.

Suggested New Mitigation Statements (Section 7)
1. No new developments should be within 3km of an SPA. (Explanation: figures of 1km are too low and only cover Rivers Deben and Orwell.)
2. No new development should be visible from anywhere within an envelope up to 100m around an SPA. For example, for up to 100 meters from the bank of the River Deben it should not be possible to see any new developments (including roofs) on either side of the River. (Explanation: this report only considers the impact of people travelling from the new developments to the site. We contend that a site is also damaged if the view from these sites is altered/damaged.)

Summary:
An up-to-date, accurate survey is vital to show current visitor and traffic numbers on our part of the coast in the summer.
Appropriate Assessment for Core Strategy (August 2011)

**Object**

5 - Methods of assessing European site visitor increases 5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

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**Respondent:** mrs jill stredwick [2579]  
**Agent:** N/A

**Full Text:**

We are addressing this e-mail to you with regard to the above subject as we feel that the issues identified in previous correspondence have not been properly addressed by the revisions in the AA and SA.

Additionally, we object that the AA still gives inappropriate weight to out-of-date and irrelevant data.

In our opinion the revisions have been seriously flawed and the LDF should be returned to the cabinet for further debate without delay.

**Summary:**

Additionally, we object that the AA still gives inappropriate weight to out-of-date and irrelevant data.

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**Attachments:**

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Dear Sir/Madam

Mr Stephen Denton [125]

Please see below my comments and reasons for my strong objection to the allocation of 2000 homes on the land owned by BT (and others) adjacent to Adastral Park. These are based on my opinion that the Appropriate Assessment is flawed in its methodology and illogical in the conclusions it draws.

The Habitats Directive Article 6(3), contains two important requirements: (a) that any plan or project which is likely to have a significant effect on a Special Area of Conservation must be the subject of an appropriate assessment by a competent national authority; and (b) that the authority may only approve the plan or project when it has ascertained that there will be no adverse effect on the SAC. Specifically it states:-

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

It is my opinion that the August 2011 revision of the Appropriate Assessment fails to demonstrate that the BT site allocation will not have an adverse effect on the SACs in the surrounding area for the following reasons:-

1) The previous version of the AA took into account the data contained in the survey of visitors to the Sandlings area to the NE of Woodbridge. This looked at visitor numbers from a wide area, including for example Ipswich, the IPA portion of SCDC, and the Felixstowe area, and drew conclusions about the degree of impact on that Sandlings area. However the AA went on to draw conclusions about the impact, or otherwise, of the proposed developments (including the BT site) on the SACs in the vicinity of the BT site, despite the fact that there was no data to justify this conclusion, and was based erroneous information about car parking for members of the public at the locations which would give access to the Deben SACs (the AA said there was none, whereas in fact there is at all the relevant locations).

2) The revised August version of the AA has now corrected these errors and makes reference to the small scale study carried out by NANT (which shows that there will be a risk that increased visitor numbers will have an adverse effect on the SAC). However these revisions to the document do not address the continuing fundamental issue that no substantive data is available to assess the degree of risk. Para 9.2 points to the need for further studies.

3) The previous version used the absence of car parking as part of its justification for saying there was little risk. Now that the latest document states (somewhat grudgingly) that there IS in fact car parking it cannot logically follow that the risk is now no greater than was stated in the previous version.

4) The August AA specifically says in para 7.2.6:-

"Further mitigation to reduce harm, as described in paragraphs 7.2.7 - 7.2.15 below remains to be required. A planning application Appropriate Assessment would be needed to look at site- and plan-specific issues. Natural England advised in its email of 15th February 2011 to Suffolk Coastal District that it believes 'that any adverse effects on N2K sites could be mitigated by the use of planning conditions/obligations/legal agreements (S106) to allow us to conclude no adverse effect on integrity. Suitable strategies are detailed in our letter to SCDC of 12 February 2010 which could be employed following AA at project level.'"

The AA also states in para 7.2.8

"The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites"

At the present time there is no information publicly available to demonstrate that there ARE any viable and effective mitigation solutions which are realistically deliverable in the timescale to meet the requirement set out in para 7.2.8. The amount of green space available on the BT site will be very limited for many years due to the mineral extraction programme. The only other nearby site which has been mentioned is the conversion of the Foxhall landfill site into a country park. This site has just completed a programme to line out and prepare capacity for another 300,000 cubic
metres. However the current rate of inert landfill being deposited is some 2000 tons pa, so it clear that unless the rate of landfill is very dramatically changed it will not be available for at least a generation and probably much longer. And even when it is completed and capped off it will require several years to settle and be made safe before public access can be considered. Therefore to even suggest that this site is likely to address the area’s need for diversionary green space with the timeframe of the LDF is misleading. The final suggestion that the open space be linked to the PRoW in the area ignores the fact that most of the PRoWs in the area (and certainly those most likely to be attractive to residents on the BT site) go towards the SACs and so will serve only to increase visitors numbers. One final point on this subject is that the proposal is that use of cycles will be encouraged (with dedicated cycle storage etc). This, in turn will encourage residents to cycle down to the Deben (which is about 10 minutes away via an existing bridleway).

Given that the LDF is very site specific with respect to the BT land, and that this is already the subject of two planning applications, it must be presumed that, if the LDF is approved in its present form, the BT development will go ahead. For the Council to suggest otherwise would be startlingly disingenuous. Therefore if the AA is approved (and inter alia the LDF) it is my strong view that any mitigation measures should be firmly identified and evaluated as being effective before the LDF is approved. If the council fails to do this then there is a very real risk that building will go ahead but the mitigation measures will not materialise - either because none can be identified, or cannot be delivered within the timescales set out in para 7.2.8 of the AA.

5) If, despite all the reservations and concerns expressed above, SCDC go ahead and approve the LDF and subsequently take the BT application to planning committee, SCDC should publicly assure its residents that approval WILL NOT be given unless and until substantive and deliverable mitigation measures are identified which are a) evidence based using real visitor data and b) deliverable in the timescales set out in the AA. These are issues which should not be swept under the carpet for later assessment as by then it will be too late to reverse any consents given.

Yours faithfully

Stephen Denton

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**Summary:**
The previous version used the absence of car parking as part of its justification for saying there was little risk. Now that the latest document states (somewhat grudgingly) that there IS in fact car parking it cannot logically follow that the risk is now no greater than was stated in the previous version.

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**Attachments:**

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Appropriate Assessment for Core Strategy (August 2011)

5 - Methods of assessing European site visitor increases

4019 Object

5: Other visitor surveys, comparison of visitor surveys and calculations of impact

Respondent: No Adastral New Town (NANT) (S Denton) [449]  
Agent: N/A

Full Text:

Please see below my comments and reasons for my strong objection to the allocation of 2000 homes on the land owned by BT (and others) adjacent to Adastral Park. These are based on my opinion that the Appropriate Assessment is flawed in its methodology and illogical in the conclusions it draws.

The Habitats Directive Article 6(3), contains two important requirements: (a) that any plan or project which is likely to have a significant effect on a Special Area of Conservation must be the subject of an appropriate assessment by a competent national authority; and (b) that the authority may only approve the plan or project when it has ascertained that there will be no adverse effect on the SAC. Specifically it states:-

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

It is my opinion that the August 2011 revision of the Appropriate Assessment fails to demonstrate that the BT site allocation will not have an adverse effect on the SACs in the surrounding area for the following reasons:-

1) The previous version of the AA took into account the data contained in the survey of visitors to the Sandlings area to the NE of Woodbridge. This looked at visitor numbers from a wide area, including for example Ipswich, the IPA portion of SCDC, and the Felixstowe area, and drew conclusions about the degree of impact on that Sandlings area. However the AA went on to draw conclusions about the impact, or otherwise, of the proposed developments (including the BT site) on the SACs in the vicinity of the BT site. However, for example Ipswich is based on erroneous information about car parking for members of the public at the locations which would give access to the Deben SACs (the AA said there was none, whereas in fact there is at all the relevant locations).

2) The revised August version of the AA has now corrected these errors and makes reference to the small scale study carried out by NANT (which shows that there will be a risk that increased visitor numbers will have an adverse effect on the SAC). However these revisions to the document do not address the continuing fundamental issue that no substantive data is available to assess the degree of risk. Para 9.2 points to the need for further studies.

3) The previous version used the absence of car parking as part of its justification for saying there was little risk. Now that the latest document states (somewhat grudgingly) that there is in fact car parking it cannot logically follow that the risk is now no greater than was stated in the previous version.

4) The August AA specifically says in para 7.2.6:-

"Further mitigation to reduce harm, as described in paragraphs 7.2.7 - 7.2.15 below remains to be required. A planning application Appropriate Assessment would be needed to look at site- and plan-specific issues. Natural England advised in its email of 15th February 2011 to Suffolk Coastal District that it believes 'that any adverse effects on N2K sites could be mitigated by the use of planning conditions/obligations/legal agreements (S106) to allow us to conclude no adverse effect on integrity. Suitable strategies are detailed in our letter to SCDC of 12 February 2010 which could be employed following AA at project level.'"

The AA also states in para 7.2.8

"The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites" The at the present time there is no information publicly available to demonstrate that there ARE any viable and effective mitigation solutions which are realistically deliverable in the timescale to meet the requirement set out in para 7.2.8.

The amount of green space available on the BT site will be very limited for many years due to the mineral extraction programme. The only other nearby site which has been mentioned is the conversion of the Foxhall landfill site into a country park. This site has just completed a programme to line out and prepare capacity for another 300,000 cubic metres. However the current rate of inert landfill being deposited is some 2000 tons pa, so it clear that unless the rate of landfill is very dramatically changed it will not be available for at least a generation and probably much longer. And even when it is completed and capped off it will require several years to settle and be made safe before public access can be considered. Therefore to even suggest that this site is likely to address the area's need for diversionary green space with the timeframe of the LDF is misleading. The final suggestion that the open space be linked to the PRoW in the area ignores the fact that most of the PRoWs in the area (and certainly those most likely to be attractive to residents on the BT site) go towards the SACs and so will serve only to increase visitors numbers. One final point on this subject is that the proposal is that use of cycles will be encouraged (with dedicated cycle storage etc). This, in turn will encourage residents to cycle down to the Deben (which is about 10 minutes away via an existing bridleway).

Given that the LDF is very site specific with respect to the BT land, and that this is already the subject of two planning applications, it must be presumed that, if the LDF is approved in its present form, the BT development will go ahead.

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For the Council to suggest otherwise would be startlingly disingenuous. Therefore if the AA is approved (and inter alia the LDF) it is my strong view that any mitigation measures should be firmly identified and evaluated as being effective before the LDF is approved. If the council fails to do this then there is a very real risk that building will go ahead but the mitigation measures will not materialise - either because none can be identified, or cannot be delivered within the timescales set out in para 7.2.8 of the AA.

5) If, despite all the reservations and concerns expressed above, SCDC go ahead and approve the LDF and subsequently take the BT application to planning committee, SCDC should publicly assure its residents that approval WILL NOT be given unless and until substantive and deliverable mitigation measures are identified which evidence based using real visitor data and b) deliverable in the timescales set out in the AA. These are issues which should not be swept under the carpet for later assessment as by then it will be too late to reverse any consents given.

Summary: The Appropriate Assessment fails to demonstrate that the BT site allocation will not have an adverse effect on the SACs, because the AA took into account the visitors survey of land to the NE of Woodbridge, but the AA went on to draw conclusions about the degree of impact or otherwise of the proposed developments (including the BT site) on the SAC’s despite there being no data to justify this conclusion and was based on erroneous information about car parking. The previous version used the absence of car parking as part of its justification for saying there was little risk. Now that the latest document acknowledges car parking and therefore there must be greater risk.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments:
full text
I object to the revised sustainability appraisal and appropriate assessment of the core strategy on the grounds that there are a large number of errors in the document. I highlight the main ones below.

APPROPRIATE ASSESSMENT

Table 3 estimates the increase in population as a result of the proposed housing. It takes a value of 1.57 as the number of new people per dwelling. No justification is provided for this value. Since the total number of people arising from these houses is a key input to this report this is unacceptable. Either this number is justified or a much higher number assumed to provide a margin of error. In any case the conclusions based on this value are suspect and should be identified as such. Further on in the document it states that the low figure of 1.57 is due to an unstated assumption that roughly one third of the future residents of any new housing will move out of existing housing in the area and hence will not be adding to the number of extra people living near the sensitive sites. This is an unproven assertion and any conclusions based on this should be removed unless it can be proven or justified.

The document comments about lack of parking in the area limiting the number of people visiting. But this only applies at peak times. For the majority of the time parking is not an issue.

The document states "Estuary-side footpaths north and south of Waldringfield are eroded and impassable ... This limits the walking routes available from Waldringfield." This is true but does not mean that no one will ever use the path. It is still used along its navigable part.

Having acknowledged that the data is poor, the assessment makes the unsupportable claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." Since a major planning decision is being made on this evidence it beggars belief that the council can ignore this fundamental weakness. There appears to be no intention of obtaining any further evidence either. Is this because it might actually contradict the conclusions of this assessment?

No change has been made to the conclusions which the assessment reaches regarding mitigation: "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This is only true if mitigation is actually implemented and is available at the start of house building. There is no mention of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

The impact of extra people visiting the Waldringfield area is discussed in the document. There has been no alteration of the unsubstantiated claim that people are unlikely to walk further than 1km or drive further than 8km. These claims are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed. The 1km figure is invalid because:

the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing.
the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. This was confirmed by a study made by NANT, which showed that people walked an average of 3.8km to the Deben Estuary.
Although the document admits that there is only a small amount of data regarding visitor numbers to sites in Europe it goes on to draw a significant number of important conclusions from this data. This is a flawed approach and requires either more data to substantiate the claim or that the conclusions drawn be removed from the document.

Finally the true increase in the number of people visiting the sites cannot be given because the current number of visitors is unknown as no accurate survey has been undertaken.

SUSTAINABILITY APPRAISAL

In the review of SCDC’s responses to consultation comments on the sustainability assessment and Reviewed Core Strategy many of the responses are inadequate and many simply state “No change to SA required” without any attempt to justify why this might be. Given the significance of the core strategy this is not acceptable.

This policy is described as “marginally more sustainable” by virtue of “the creation of a countryside park on the Foxhall tip by the end of the plan period”. The reference to the Foxhall Tip is contradicted in the last paragraph where it states that designated areas will need to be safeguarded “by providing open space as part of the housing development at the beginning of the development”. Also it is pointed out that “Foxhall Country Park is unlikely to be developed within the plan period”. Consequently the policy is not more sustainable than before and in fact is less sustainable since no proposals have been made for any countryside parks at the beginning of the development.

Only the briefest mention is made of the potential impact of increased boating activities on the River Deben. In fact this is a potentially serious problem and has been ignored and passed across to the area action plan. Large boats, and particularly motor boats, have a powerful disturbing affect on feeding birds, and they are a major cause of erosion of the fragile saltmarsh ecosystem. This point has been made several times by NANT and Waldringfield PC and has been consistently ignored.

The document states "There is uncertainty as to when a country park could be delivered at Foxhall tip". The key point is that it will not be in place when any development on the 2000 houses at Martlesham begins. In spite of this the assertion is still present in the document that these 2,000 houses will have an insignificant impact on the nearby European sites. This will only be the case if mitigation appears at the start of house building, and is very unlikely to happen.

Summary: Although the document admits that there is only a small amount of data regarding visitor numbers to sites in Europe it goes on to draw a significant number of important conclusions from this data. This is a flawed approach and requires either more data to substantiate the claim or that the conclusions drawn be removed from the document.

Finally the true increase in the number of people visiting the sites cannot be given because the current number of visitors is unknown as no accurate survey has been undertaken.

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I wish to OBJECT to the findings in the revised AA and SA dated August 2011.

The revisions in the AA and SA have not addressed the issues identified in my previous consultation responses. Inappropriate weight is still given in the AA to out of date and irrelevant data. Data collected recently and more importantly, locally, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions.

The "suite of mitigation measures" includes a new country park. No site has been identified or examined for suitability either geographically or economically and there is no evidence that this can be provided to attempt to mitigate against the damage done to the sensitive locality.

On the basis of these revisions the LDF should be returned to the cabinet for further debate and it should not be overlooked that insufficient publicity was given to the consultation opportunity on these revisions, and also the impediment placed in the way of the public being able to respond conveniently by the extremely confusing on-line process. The time deadline was also completely misleading.

Summary: I wish to OBJECT to the findings in the revised AA and SA dated August 2011.

The revisions in the AA and SA have not addressed the issues identified in my previous consultation responses. Inappropriate weight is still given in the AA to out of date and irrelevant data. Data collected recently and more importantly, locally, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions.

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Attachments: None
4048  Object

5 - Methods of assessing European site visitor increases
form an increased human population

5.8: Other visitor surveys, comparison of visitor surveys
and calculations of impact

Respondent: Mrs Jennifer Egan [329]  Agent: N/A

Full Text:

I OBJECT to the findings in the revised AA and SA dated August 2011

The issues identified in my previous consultation responses have not be addressed by the revisions in the AA and SA

In addition, the AA is still giving inappropriate weight to out of date and irrelevant data

The South Sandlings Survey and the Deben Visitor Survey have both been acknowledged but then ignored

A new Country Park is going to go where? and at a cost of what? no site has been identified or costed and there is no evidence that if will ever materialise

The LDF should be returned to cabinet for further debate

Summary:
In addition, the AA is still giving inappropriate weight to out of date and irrelevant data

The South Sandlings Survey and the Deben Visitor Survey have both been acknowledged but then ignored

Change to Plan

Not Specified  Not Specified  Not Specified  Not Specified  None

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I wish to OBJECT to the findings in the revised Appropriate Assessment and Sustainability Appraisal.

Concerns raised by objectors have not been dealt with by the revised AA or SA.

New information provided by the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but subsequently ignored.

The AA continues to give inappropriate weight to out of date and inappropriate data.

With reference to the ‘new country park’ in the ‘suite of mitigation measures’ there is no evidence that this would materialise, no site has been identified or costed.

I REMAIN APPALLED AT THE LACK OF AWARENESS IN THE LOCAL POPULATION AT THE PROPOSED DEVELOPMENT AT MARTLESHAM. AS A RESIDENT OF WOODBRIDGE I CONTINUALLY MEET PEOPLE WHO HAVE NOT HEARD ABOUT THESE PLANS. THIS MAKES A MOCKERY OF ANY SO CALLED PUBLIC CONSULTATION. THE COUNCIL HAS FAILED IN IT’S DUTY TO INFORM ITS RESIDENTS AND TAX-PAYERS OF SUCH A HUGE AND IRREVERSIBLE POTENTIAL CHANGE TO THEIR COMMUNITY.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

New information provided by the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but subsequently ignored.

The AA continues to give inappropriate weight to out of date and inappropriate data.
4072  Object
5 - Methods of assessing European site visitor increases 
5.8: Other visitor surveys, comparison of visitor surveys
form an increased human population

O - 4072 - 567 - 5.8: Other visitor surveys, comparison of visitor surveys
and calculations of impact

Respondent: G D M de Margary [567]  
Agent: N/A

Full Text: I OBJECT to the findings in the revised AA and SA dated August 2011.

The issues identified in my previous consultation responses have not been addressed by the revisions in the AA and SA.

In addition, the AA still gives inappropriate weight to out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions. As have various points raised in my earlier two emails, one of which is attached. The comments in those emails are still valid.

I am firmly of the opinion that whatever any of those who live in in the area say are ignored (or mentioned and then ignored).

The govt's view on planning has changed to brown field sites only, and development should be spread throughout the area not just dumped in one place (Martlesham Heath).

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Summary: In addition, the AA still gives inappropriate weight to out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions.

Change to Plan

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Attachments:
5 - Methods of assessing European site visitor increases form an increased human population

Respondent: Waldringfield Parish Council (Mrs Jean Potter) [509]

Full Text:

Å§5 Methods of assessing European site visitor increases from an increased human population

Point 1, Summary:

There is no up to date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites of concern to the Appropriate Assessment. Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"There is a limited amount of data regarding the quantity of visitors to European sites" (Å§5.1.10). Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available, and can be used to predict increases in visitor numbers from new housing." (Å§5.1.10). This survey covers the AONB as a whole. It makes no mention of the Deben Estuary SPA/SSSI/RAMSAR Site. Neither does it mention the other SSSIs near to Adastral Park (Newbourne Springs, Ipswich Heaths and Sinks Valley, Kesgrave), because they are not in the AONB. The only interview locations on the River Deben are at Melton and Bawdsey, which are irrelevant to the proposed housing at Adastral Park and Felixstowe. All the interviews were conducted in August, in early spring, autumn or winter. These facts make the AONB 2004 survey completely irrelevant to any prediction of increases in visitor numbers from new housing. In particular, the phrase "can be used to predict increases in visitor numbers from new housing" refers to visitors to the European Sites potentially affected, as listed in Å§2.1.2. In Å§2 (European sites potentially affected) it makes no mention of the AONB.

Throughout Å§5.3 (Calculations to predict additional visitors to European sites across the Suffolk Coast and Heaths AONB using Tourist Board data) the distinction between the AONB and the European Sites is regularly confused. For example:

- in Å§5.3.5 it says: "Many of the sites in the AONB involved in the visitor study were European sites, so the study is relevant to this Appropriate Assessment."
- The AONB (2004) study makes no mention of (and certainly does not 'involve') any environmentally designated sites, European or otherwise.
- In Å§5.3.21 it says: "... roughly one-quarter of all visits to the AONB originate from Ipswich Borough and Suffolk Coastal District. This assumption is also applied to the European sites within the AONB." On what basis is this assumption also applied to European sites within the AONB?
- In Å§5.3.18 it says: "Table 6 shows that the increase in visitors to the Suffolk Coast and Heaths AONB, as a result of the proposed developments is predicted to be 2.83%." In Å§5.3.25 it says: "To allow for these assumptions, the approximate 2.83% increase in total visitors to the AONB is given as a range of 2% - 5%." (our emphasis). Both of these refer to the AONB, not any European Site or Sites. But then in Å§5.3.26 it says: "it would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% ..." No justification is given for jumping from a conclusion about visitors to the AONB to one about visitors to European Sites.

Not only is there a confusion between the AONB and European Sites within the AONB, but no attempt is made in Å§5.3 to distinguish between individual European Sites. For example, the Deben Estuary SPA is obviously more likely to receive a greater increase in visitors due the proposed housing at Adastral Park than more northerly sites such as the Minsmere-Walberswick SPA, but this is not mentioned. (The discussion of the South Sandlings Survey in Å§5.5 rectifies this for the European Sites within the survey area, but of course this does not cover the Deben Estuary, and it does not clarify the confusions in Å§5.3.)

Point 2, Summary:

The estimate of the net increase in people for the East Ipswich Plan Area, based as it is on 1.57 new people per dwelling, is a serious under-estimate. The figure of 1.57 comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. It contains the absurd hidden assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding. There is no evidence that there is any overcrowding in these villages.

In Å§5.3.7 to Å§5.3.13, and particularly in Table 3, an attempt is made to estimate the increase in population due to the proposed housing. To do this it uses the 'number of new people per new dwelling', which in Suffolk Coastal is supposed to be 1.57. This is more realistic than the previous figure of 0.9, but is still seriously flawed. It comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. According to the Oxford Economics Study the occupancy rate in the East was 2.31 (in 2009) decreasing to 2.22 (in 2022), giving an average of 2.27. (p34)

In Å§5.3.9 the figure of 1.57 is explained: "This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy." It is extremely unlikely that any of the 2,000 dwellings proposed for Adastral Park will be bought for holiday homes, so the difference between the 4,540 (2,000x2.27) new occupants and the 3,140 (2,000x1.57) new people to the area must be accounted for by assuming that 1,400 (4,540-3,140) people will move to Adastral Park because of the fragmentation of multiple person households in the area, and so will not be adding to the number of extra people living near the Deben Estuary. This dubious assumption is not explained or even mentioned, let alone properly justified. It is in fact totally implausible: In order for an occupant of the new housing at Adastral Park not to count as a 'new' additional person, he/she must:
5 - Methods of assessing European site visitor increases

1. move to Adastral Park from somewhere at least equally near the Deben Estuary (approximately)
2. move out of a multiple person household into one with the same or lower occupancy at Adastral Park
3. not be replaced by anyone moving into the area from further afield
4. not be part of a house-moving chain involving anyone moving into the area from further afield

The only places that qualify for inclusion in (1) are: Woodbridge, Newbourne, Henley, Brightwell, Martlesham Village and Martlesham Heath (just). Kesgrave and Grange Farm are roughly twice the distance from the Deben Estuary so can be excluded, and Woodbridge can be excluded because although it is on the River Deben, it is not on a sensitive part: “the Deben Estuary is not assessed by Natural England as being unfavourable due to human disturbance” [AS6.2.35]. The combined populations of these 6 villages is 6,630; so the Appropriate Assessment contains the absurd hidden assumption that 1,400 (21%) of the residents of these villages will move to Adastral Park because of pressures of over-crowding. There is no evidence that there is any over-crowding in these areas, or that there is any desire for the residents to move to the proposed housing at Adastral Park - the idea is quite ludicrous. The upshot of this is that the figure of 3,462 for the Estimated net increase in people for the East Ipswich Plan Area, (Table 3, based as it is on 1.57 new people per dwelling, is a serious under-estimate. It is far more likely that the entire population of the 2,000 new houses at Adastral Park will come from outside the immediate area, and will be about 4,540 (2,000x2.27).

The same criterion can be applied to the Felixstowe, Walton and the Trimleys figure of 2,763 (Table 3).

Point 3, Summary:
The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing the upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.

The actual increase in the number of people visiting the sites is not given, because the specific number of visitors is unknown (because of the lack of a proper survey - see above).

The assumptions given in AS5.3.14 are all highly dubious (except one):
* the proportion of day visitors to sites by the new residents is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity" OK, this is an acceptable assumption.
* the pattern of day visits to sites by the new residents is similar to that of the existing population* This is very unlikely.
* the proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximiy to the Deben and Orwell Estuaries.
* "the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey" It is not clear if 'sites' is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.
* "an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity" OK, this is an acceptable assumption.
* *the relative proportions of day visitors and overnight visitors does not change" Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase.
* "the summer snapshot survey is typical of visitors all year round." This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to - be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

Table 4 (AS5.3.13), second column reads 'Estimated increase in people (table 2)'. The data is actually taken from Table 3.

Table 5 (AS5.3.16), second column reads 'proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1.' The data is actually taken from Table 2.

The calculations in Table 5 and described in AS5.3.15 are an attempt to predict the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as stated in the title of Table 6. However, in several places the restriction (in bold above) is not made clear, for example in AS5.3.14-16. This gives the impression that it predicts the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from all potential sources. 50.5% of the total day visitors to the AONB come from outside Suffolk Coastal and Ipswich Borough/Pinewood. Increases in the populations in the areas these people come from have been excluded from the calculations. This is unrealistic - Babergh, Tendring, Waveney and all the other nearby districts all have LDF Core Strategies that propose large housing allocations and correspondingly large increases in populations. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as described in AS5.3.15 and shown in Table 5, is logically flawed. Column A only includes day visitors who live in Suffolk Coastal and Ipswich Borough/Pinewood. In Column B this is multiplied by the proportion of visitors who are day visitors (55%). However, the figure of 55% applies to visitors from all locations, not just those from Suffolk Coastal and Ipswich Borough/Pinewood. Common sense tells us that local visitors are more likely to be on day trips than those coming from further afield, and this is confirmed by comparing Map3 (p11) with Map 4 (p12) in the Suffolk Coast and Heaths AONB Survey (2004). It is therefore reasonable to assume that a far larger value than 55% should be used as the multiplier in Column B (the data shown in the Suffolk Coast and Heaths AONB Survey (2004) isn't sufficiently detailed to tell us what the value should be.). In fact it would be much more realistic to have different multipliers for the different areas - for example we know that about 95% of visitors to Martlesham are on day trips (Suffolk Coast and Heaths AONB Survey (2004) Chart 3), so if most of these came from...
the East Ipswich Plan Area we could use 95% as the multiplier in Column B, 2nd row.

Two of the three assumptions given in Â§5.3.23 are highly dubious:

* "'New' people in the Borough / District will have the same visiting pattern as 'existing' people" This is very unlikely - see comments on Â§5.3.14, first bullet point
* "Visits by holiday makers will not be affected by any increased use by local visitors" It is possible that overcrowding at popular sites will put off holidaymakers. Holiday makers generally want to visit unspoiled countryside; the urbanisation resulting from the housing allocations, particularly at Adastral Park, is very likely to deter holidaymakers.

The uncertainties in the calculations are acknowledged by the vagueness of the conclusion (Â§5.3.26): "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% as a result ... " It would also be reasonable to assume that the increase is far higher than 5%. What justification is there for choosing 5% as the upper limit rather than, say, 10%? The flaws in the methodology, the likelihood that the assumptions in Â§5.3.14 and Â§5.3.23 are invalid, and the inappropriateness of using the Suffolk Coast and Heaths AONB Survey (2004) results in the first place all combine to make this conclusion completely worthless.

Point 4, Summary:
The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the proposed new housing in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area than the average across the AONB. One would expect the increase in visitors to the Orwell and Deben Estuary SPAs to be far greater than the 8.8% estimated for the South Sandlings area. Nowhere is this obvious conclusion stated.

Another reason the figure of 2-5% is worthless is that it is an average across the whole of the AONB. 77% of the proposed new housing is in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area, all of which are far closer to the Orwell and Deben Estuaries than the other European Sites in the AONB, and these sites will therefore receive a far greater increase in visitors than the average across the whole of the AONB. Even if the figure of 2-5% is correct it tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs. This point is made in Â§5.8.1 with regard to the South Sandlings area "Fewer people living in or east of Ipswich might visit distant parts of the AONB compared to the South Sandlings, thus having a smaller impact over the AONB", but unfortunately the obvious extension of this argument to the Deben and Orwell Estuaries hasn't been made.

"It is a reasonable assumption that an increase in dwellings would generate a proportionate increase in visitors from any particular distance band. For example, if the number of houses doubled in a particular distance band the number of visitors from that area would also double" (Â§5.6). We agree with this. It is a pity that this logic can't also be applied to the impact on the Deben Estuary of the 2,000 houses proposed for Adastral Park. The calculation method described in Â§5.5.9 and Â§5.10 seems to be far more realistic than those used in Â§5.3 (criticised above), and there seems to be no good reason why it couldn't also be applied the Adastral Park - Deben Estuary situation if basic data on visitor numbers were known.

"The distribution of proposed housing is not precisely specified within the Core Strategies." (Â§5.5.7) This is not entirely true. One of my main complaints about the SCDC LDF Core Strategy is that it is very site-specific. 2,000 houses 'to the south and east of Adastral Park' could hardly be more site-specific.

In Â§5.5.12 the increase in the number of visitors to the South Sandlings area as a result of the Ipswich and Suffolk Coastal Core Strategies is predicted to be 8.8% (broadened to 6-12% in Â§5.5.14). Most of the housing proposed in these Core Strategies is far nearer to the Deben Estuary than it is to the South Sandlings area, so one would expect the increase in the number of visitors to the former to be far greater than 8.8%. Nowhere is this obvious conclusion stated. (No estimate is given for the increase in the number of visitors to the Deben Estuary as a result of the Ipswich and Suffolk Coastal Core Strategies, which is a pity as this is the SPA most affected by the extra housing.)

Point 5, Summary:
The claim that people are unlikely to walk further than 1km is absurd. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.

Throughout Â§5.6 various references are made to the ridiculous claims that people are unlikely to walk further than 1km or drive further than 8km. For example: "...only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur..." (Â§5.6.6). These are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed.

The 1km figure is invalid because:

1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked less than 1km was that they were that less than 1km from the site, so didn't need to walk further.
3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.
Appropriate Assessment for Core Strategy (August 2011)

The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. The inappropriateness of the 1km figure is borne out by the Deben Estuary Survey, which shows that 57.1% (far more than the 11% in Dorset) of visitors to the River Deben who arrived on foot walked more than 1km (Deben Estuary Survey, Â§2.19). The average distance travelled by people on foot (3.8km) easily puts the Deben Estuary SPA within the orbit of the proposed LDF Core Strategy site at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption. “The allocation east of Ipswich around Martlesham could be close to the Deben Estuary SPA” (Â§5.6.7). The allocation east of Ipswich around Martlesham is close to the Deben Estuary SPA - it is 1.8km away (as the crow flies). The use of the term ‘could be’ is disingenuous - it implies there is some leeway in where the housing goes, which isn’t the case. The LDF Core Strategy specifies ‘To the south and east of Adastral Park’ which can only mean one thing - BT’s land (see BT’s planning application C09/0555).

“The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings” (Â§5.8.5). Whilst this is factually correct, its significance is questionable, as the Deben Estuary Survey did not cover the winter period, it simply asked interviewees if they also visited in the winter. The Deben Estuary visitor survey … does not have the data or analysis to predict changes in visitor numbers” (Â§5.8.8). This is partly true, a more comprehensive survey carried out by professionals would be needed for that. The survey says: “We hope that the data we have collected is helpful in providing some baseline information from which further studies can be conducted or more realistic projections made regarding increased visitor numbers resulting from the Adastral Park, Martlesham development and the consequent impact on the wildlife.” (Deben Estuary visitor survey, Â§1.9). The point is that the Appropriate Assessment makes predictions of increases to visitor numbers without any data on current visitor numbers, so although the Deben Estuary visitor survey isn’t scientifically rigorous, it is better than nothing. Â§6.2 Policy SP2. Housing numbers

Point 6. Summary: The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The conclusion that it is unlikely that many visitors would walk from their homes to the Deben Estuary SPA at Martlesham, and that it is expected there will be no new high levels of disturbance, are based on the flawed assumption that people won’t walk more than 1km and an unrealistic reliance on greenspace provision. “… the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk” There is nothing wrong with the estuary-side path, it is perfectly walkable for about 2.5km up to the breach opposite Methersgate Quay. We agree with most of Â§6.2.28, although the location of the proposed housing is known precisely - it is 'To the south and east of Adastral Park’ see comments on Â§5.6.7, above.

Point 7. Summary: The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren’t necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as ‘lost due to erosion’ is grossly misleading. These paths are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

“This limit to parking suggests that there is limited availability for an increase in visitors arriving by car to Waldringfield.” “Given the limit to available parking the increase in visitors walking along the estuary might be less than that predicted.” (Â§6.2.35) Obviously the parking space is ‘limited’, i.e. it isn’t infinite! In fact there is space for about 75 cars in the public parking area and about 22 in the patrons only area. However, too much emphasis has been placed on the “limit to available parking” - this only applies at peak times, most of the year there is plenty of space. A letter to the Chair of Waldringfield PC from the manager of the Maybush, dated 16/2/10 says: “… the car park, generally, is not at capacity at any other time than school holidays, bank holidays and weekends. It is however often at capacity during these times. It is well kept!

“The Deben Estuary visitor survey ... does not have the data or analysis to predict changes in visitor numbers” (BT’s planning application C09/0555).

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
estuary at Waldringfield (The Deben Estuary Visitor Survey by NANT of July 2011 gives 3km).” (§6.2.35) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 2.0km and 2.5km respectively (Deben Estuary Survey, §3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.1km.

"Estuary-side footpaths north and south of Waldringfield are eroded and impassable, according to data received from Suffolk County Council in August 2011 (see Figure 03). This limits the walking routes available from Waldringfield.” (§6.2.36). Figure 03 shows the footpath extending about 1km north of the reservoir as ‘Section lost due to erosion’. This is completely untrue and is grossly misleading. In fact the path north of Waldringfield is breached opposite Metersgate Quay about 2/3 of the way along the section shown as ‘lost’, and the path south of Waldringfield is breached just beyond Early Creek, at the southern end the section shown as ‘lost’. In places these paths can get muddy in poor weather, but otherwise are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

Point 8, Summary:

A conclusion that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA is based on the invalid assumption that people won’t walk more than 1km, and the unrealistic reliance on greenspace provision.

“it can be ascertained that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA, given a location well over 1km from the estuary and with adequate greenspace provision.” (§6.2.42). This is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on §5.6), and the unrealistic reliance on greenspace provision - see our comments on §7.

Point 9, Summary:

No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment.

No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is important because: “On one estuarine site, disturbance to birds from boats was thought to be the biggest problem” (§5.7.6). Motor boats and jet skis, which create a large wake, also contribute to erosion of the river banks, endangering the delicate saltmarsh ecosystem. This is a serious omission from the Appropriate Assessment.

Point 10, Summary:

The Appropriate Assessment places great reliance on the creation of a new country park as mitigation. This is despite the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Even if a site is found it will not have any of the attractive features of the Deben Estuary, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

The Appropriate Assessment places great reliance on the creation of a new country park, which it claims will provide mitigation by diverting visitors (and particularly dog walkers) away from the Deben Estuary. No specific site is suggested, although a location vaguely described as “to the north or north-east of Ipswich” is proposed (§7.2.10).

However, no mention is made of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

Various wish-lists of desirable features of this mitigating greenspace are presented throughout §7.2. However, the ones that could actually attract visitors away from the Deben Estuary are conspicuous by their absence. Most people who visit the Deben Estuary do so because of the river. They walk along its banks, their children play on the beach and swim in the river, they sail, fish, birdwatch and engage in many other river-based activities, and of course the Maybush at Waldringfield attracts people from far and wide. A country park will not have any of these attractive features, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

There isn’t an abundance of suitable sites “to the north or north-east of Ipswich”. The phrase “to the north or north-east of Ipswich” suggests that it is likely that the site will be west of the A12, and if this is the case then the Deben Estuary will be far more accessible to the residents of the proposed Adastral Park development than the mitigation site, as the A12 presents a significant barrier to walkers.

Following the dubious logic of the Appropriate Assessment, if the mitigating greenspace is more than 1km from the development, visitors are unlikely to walk there. A circle of radius 1km from Adastral Park barely reaches beyond Martlesham Heath to the west or Tesco’s car park to the north, an area that contains no significant candidate spaces, so it is difficult to see where this greenspace could come from. Unless, that is, people are expected to drive to the mitigation site, in which case it won’t have any effect on visitors going to the Deben Estuary on foot, but will increase traffic congestion west of the A12.

Recent evidence from Dorset casts serious doubt on the effectiveness of alternative greenspace in mitigating against increases in visitors to environmentally sensitive sites: “Almost all responding households had some ‘Other’ greenspace within 1.5km. The presence of this ‘Other’ greenspace had no apparent effect on reducing either the likelihood or frequency of visiting heaths… Some of the results suggest that people with more greenspace surrounding their homes may actually visit heaths more…” The most critical conclusion is that there appears to be only a slender relationship between the amount of (existing) alternative greenspace nearby and the amount of heathland visits” (East Dorset District Council Public Report - Household Survey, Footprint Ecology, May 2009, p27).
No change has been made to the conclusions on mitigation (§7.4): "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This of course depends on the mitigation being implemented and available at the start of house building. However, even if it is, it is highly unlikely that "the impacts of additional housing provisions in Policy SP2 and related policies ... will be reduced to an insignificant level" (§7.4.1). Where is the evidence that this (as yet hypothetical) mitigation will reduce the 'adverse effect' to an 'insignificant level'? The current number of visitors to the European sites isn't even known, and the increase isn't known either, so how can it be said with confidence that this increase will be eradicated with appropriate mitigation? It is pure speculation, without any basis in fact. 

§8 Conclusions

Point 11, Summary:
Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility. 

"It is concluded that policy SP2 would have an adverse effect upon the integrity of a number of European sites, alone and in combination with the Ipswich Borough Core Strategy and Policies." (§8.6.1). This we do agree with. "Mitigation is proposed which, if implemented, would reduce the adverse effect to an insignificant level and would enable a conclusion that it can be ascertained that there will be no adverse effect upon the integrity of any European site." (§8.6.1). As explained above, given that no sites or funding have been found, mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. We believe there is no justification for this optimism, and that it is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility. 

§9.2 Further work needed

Point 12, Summary:
It is claimed that further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. Yet it is acknowledged that the data upon which major decisions have been based is poor. No attempt will be made to get better data before the decisions are formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions. This is not how decision making is supposed to work. 

"Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected." (§9.1.1). This decision was made in 2009. If SCDC had instead decided to commission a proper visitor survey at that time, it would probably be complete by now (2 years later), and could have provided a far more reliable basis for assessing the impact of the housing proposed in the Ipswich Borough and Suffolk Coastal Core Strategies. 

Having acknowledged that the data is poor, the Appropriate Assessment makes the highly dubious claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." (§9.2.3) So a major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions. 

Summary: 
There is no up to date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites of concern to the Appropriate Assessment. Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.
**Appropriate Assessment for Core Strategy (August 2011)**

**4076**  
**Comment**

5 - Methods of assessing European site visitor increases form an increased human population  
5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

**Respondent:** Waldringfield Parish Council (Mrs Jean Potter)  
**Agent:** N/A

**Full Text:**

 Á§5 Methods of assessing European site visitor increases from an increased human population  

Point 1, Summary:  
There is no up to date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites of concern to the Appropriate Assessment. Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.  

“There is a limited amount of data regarding the quantity of visitors to European sites” (Á§5.1.10) Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.  

“A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available, and can be used to predict increases in visitor numbers from new housing.” (Á§5.1.10). This survey covers the AONB as a whole. It makes no mention of the Deben Estuary SPA/SSSI/RAMSAR Site. Neither does it mention the other SSSIs near to Adastral Park (Newbourne Springs, Ipswich Heaths and Sinks Valley, Kesgrave), because they are not in the AONB.  

The only interview locations on the River Deben are at Melton and Bawdsey, which are irrelevant to the proposed housing at Adastral Park and Felixstowe. All the interviews were conducted in August, none in spring, autumn or winter. These facts make the AONB 2004 survey completely irrelevant to any prediction of increases in visitor numbers from new housing. In particular, the phrase “can be used to predict increases in visitor numbers from new housing” refers to visitors to the European Sites potentially affected, as listed in Á§2.1.2. In Á§2 (European sites potentially affected) it makes no mention of the AONB.  

Throughout Á§5.3 (Calculations to predict additional visitors to European sites across the Suffolk Coast and Heaths AONB using Tourist Board data) the distinction between the AONB and the European Sites is regularly confused. For example:  
* In Á§5.3.5 it says: “Many of the sites in the AONB involved in the visitor study were European sites, so the study is relevant to this Appropriate Assessment.” The AONB (2004) study makes no mention of (and certainly does not ‘involve’) any environmentally designated sites, European or otherwise.  
  * In Á§5.3.21 it says: “... roughly one-quarter of all visits to the AONB originate from Ipswich Borough and Suffolk Coastal District. This assumption is also applied to the European sites within the AONB.” On what basis is this assumption also applied to European sites within the AONB?  
* In Á§5.3.18 it says: “Table 6 shows that the increase in visitors to the Suffolk Coast and Heaths AONB, as a result of the proposed developments is predicted to be 2.83%.” In Á§5.3.25 it says: “To allow for these assumptions, the approximate 2.83% increase in total visitors to the AONB is given as a range of 2% - 5%.” (our emphasis). Both of these refer to the AONB, not any European Site or Sites. But then in Á§5.3.26 it says: “It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% ...” No justification is given for jumping from a conclusion about visitors to the AONB to one about visitors to European Sites.  

Not only is there a confusion between the AONB and European Sites within the AONB, but no attempt is made in Á§5.3 to distinguish between individual European Sites. For example, the Deben Estuary SPA is obviously more likely to receive a greater increase in visitors due the proposed housing at Adastral Park than more northerly sites such as the Minsmere-Walberswick SPA, but this is not mentioned. (The discussion of the South Sandlings Survey in Á§5.5 rectifies this for the European Sites within the survey area, but of course this does not cover the Deben Estuary, and it does not clarify the confusion in Á§5.3.)  

Point 2, Summary:  
The estimate of the net increase in people for the East Ipswich Plan Area, based as it is on 1.57 new people per dwelling, is a serious under-estimate. The figure of 1.57 comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. It contains the absurd hidden assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding. There is no evidence that there is any overcrowding in these villages.  

In Á§5.3.7 to Á§5.3.13, and particularly in Table 3, an attempt is made to estimate the increase in population due to the proposed housing. To do this it uses the ‘number of new people per new dwelling’, which in Suffolk Coastal is supposed to be 1.57. This is more realistic than the previous figure of 0.9, but is still seriously flawed. It comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. According to the Oxford Economics Study the occupancy rate in the East was 2.31 (in 2009) decreasing to 2.22 (in 2027), giving an average of 2.27. (p34)  

In Á§5.3.9 the figure of 1.57 is explained: “This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy.” It is extremely unlikely that any of the 2,000 dwellings proposed for Adastral Park will be bought for holiday homes, so the difference between the 4,540 (2,000x2.27) new occupants and the 3,140 (2,000x1.57) new people to the area must be accounted for by assuming that 1,400 (4,540-3,140) people will move to Adastral Park because of the fragmentation of multiple person households in the area, and so will not be adding to the number of extra people living near the Deben Estuary. This dubious assumption is not explained or even mentioned, let alone properly justified. It is in fact totally implausible: In order for an occupant of the new housing at Adastral Park not to count as a ‘new’ additional person, he/she must:  

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
1. move to Adastral Park from somewhere at least equally near the Deben Estuary (approximately)
2. move out of a multiple person household into one with the same or lower occupancy at Adastral Park
3. not be replaced by anyone moving into the area from further afield
4. not be part of a house-moving chain involving anyone moving into the area from further afield

The only places that qualify for inclusion in (1) are: Waldringfield, Newbourne, Hemley, Brightwell, Martlesham Village and Martlesham Heath (just). Kesgrave and Grange Farm are roughly twice the distance from the Deben Estuary so can be excluded, and Woodbridge can be excluded because although it is on the River Deben, it is not on a sensitive part: "the Deben Estuary is not assessed by Natural England as being unfavourable due to human disturbance" (§6.2.35). The combined populations of these 6 villages is 6,630, so the Appropriate Assessment contains the absurd hidden assumption that 1,400 (21%) of the residents of these villages will move to Adastral Park because of pressures of overcrowding. There is no evidence that there is any overcrowding in these areas, or that there is any desire for the residents to move to the proposed housing at Adastral Park - the idea is quite ludicrous.

The upshot of this is that the figure of 3,462 for the 'Estimated net increase in people' for the East Ipswich Plan Area, (Table 3), based as it is on 1.57 new people per dwelling, is a serious under-estimate. It is far more likely that the entire population of the 2,000 new houses at Adastral Park will come from outside the immediate area, and will be about 4,540 (2,000x2.27).

The same criticism can be applied to the Felixstowe, Walton and the Trimleys figure of 2,763 (Table 3).

Point 3, Summary:
The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing the upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.

The actual increase in the number of people visiting the AONB is not given, because the current number of visitors is unknown (because of the lack of a proper survey - see above).

The assumptions given in §5.3.14 are all highly dubious (except one):
* "the pattern of day visitors to sites by the new residents is similar to that of the existing population" This is very unlikely.
* "the proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries.
* "the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey" It is not clear if 'sites' is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.
* "an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity" OK, this is an acceptable assumption.
* "the relative proportions of day visitors and overnight visitors does not change" Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase.
* "the summer snapshot survey is typical of visitors all year round." This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to - be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

Table 4 (§5.3.13), second column reads 'Estimated increase in people (table 2)'. The data is actually taken from Table 3.

Table 5 (§5.3.16), second column reads 'proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1'. The data is actually taken from Table 2.

The calculations in Table 5 and described in §5.3.15 are an attempt to predict the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as stated in the title of Table 6. However, in several places the restriction (in bold above) is not made clear, for example in §5.3.14-16. This gives the impression that it predicts the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from all potential sources. 50.5% of the total day visitors to the AONB come from outside Suffolk Coastal and Ipswich Borough/Pinewood. Increases in the populations in the areas these people come from have been excluded from the calculations. This is unrealistic - Babergh, Trendring, Waveney and all the other nearby districts all have LDF Core Strategies that propose large housing allocations and correspondingly large increases in populations.

The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as described in §5.3.15 and shown in Table 5, is logically flawed. Column A only includes day visitors who live in Suffolk Coastal and Ipswich Borough/Pinewood. In Column B this is multiplied by the proportion of visitors who are day visitors (55%). However, the figure of 55% applies to visitors from all locations, not just those from Suffolk Coastal and Ipswich Borough/Pinewood. Common sense tells us that local visitors are more likely to be on day trips than those coming from further afield, and this is confirmed by comparing Map3 (p11) with Map 4 (p12) in the Suffolk Coast and Heaths AONB Survey (2004). It is therefore reasonable to assume that a far larger value than 55% should be used as the multiplier in Column B (the data shown in the Suffolk Coast and Heaths AONB Survey (2004) isn't sufficiently detailed to tell us what the value should be.) In fact it would be much more realistic to have different multipliers for the different areas - for example we know that about 95% of visitors to Martlesham are on day trips (Suffolk Coast and Heaths AONB Survey (2004) Chart 3), so if most of these came from...
<table>
<thead>
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<th>Point 5, Summary:</th>
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<td>The claim that people are unlikely to walk further than 1km is absurd. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.</td>
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| Throughout A§5.6 various references are made to the ridiculous claims that people are unlikely to walk further than 1km or drive further than 8km. For example: "...only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur..." (A§5.6.6). These are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed. The 1km figure is invalid because: |
| 1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland |
| 2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked less than 1km was that they lived less than 1km from the site, so didn't need to walk further. |
| 3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub. |
| 4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it. |

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**Appropriate Assessment for Core Strategy (August 2011)**

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<th>4076 Comment</th>
<th>5 - Methods of assessing European site visitor increases form an increased human population</th>
<th>5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact</th>
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</thead>
<tbody>
<tr>
<td>Two of the three assumptions given in A§5.3.23 are highly dubious:</td>
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<td>* &quot;’New’ people in the Borough / District will have the same visiting pattern as ’existing’ people&quot; This is very unlikely - see comments on A§5.3.14, first bullet point</td>
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<td>* &quot;Visits by holiday makers will not be affected by any increased use by local visitors&quot; It is possible that overcrowding at popular sites will put off holidaymakers. Holiday makers generally want to visit unspoiled countryside; the urbanisation resulting from the housing allocations, particularly at Adastral Park, is very likely to deter holidaymakers.</td>
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<tr>
<td>* &quot;Sites, including their car parks, will not constrain the number of visits by becoming 'full' and turning away visitors&quot; OK, this is an acceptable assumption.</td>
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The uncertainties in the calculations are acknowledged by the vagueness of the conclusion (A§5.3.26): "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% as a result ..." It would also be reasonable to assume that the increase is far higher than 5%. What justification is there for choosing 5% as the upper limit rather than, say, 10%? The flaws in the methodology, the likelihood that the assumptions in A§5.3.14 and A§5.3.23 are invalid, and the inappropriateness of using the Suffolk Coast and Heaths AONB Survey (2004) results in the first place all combine to make this conclusion completely worthless. |

Point 4, Summary: The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the number of visitors to the Orwell and Deben Estuary SPAs, which are far closer to the proposed new housing in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area than the average across the AONB. One would expect the increase in the Orwell and Deben Estuary SPAs to be far greater than the 8.8% estimated for the South Sandlings area. Nowhere is this obvious conclusion stated. |

Another reason the figure of 2-5% is worthless is that it is an average across the whole of the AONB. 77% of the proposed new housing is in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area, all of which are far closer to the Orwell and Deben Estuaries than the other European Sites in the AONB, and these sites will therefore receive a far greater increase in visitors than the average across the whole of the AONB. Even if the figure of 2-5% is correct it tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs. This point is made in A§5.8.1 with regard to the South Sandlings area "Fewer people living in or east of Ipswich might visit distant parts of the AONB compared to the South Sandlings, thus having a smaller impact over the AONB", but unfortunately the obvious extension of this argument to the Deben and Orwell Estuaries hasn't been made. |

"It is a reasonable assumption that an increase in dwellings would generate a proportionate increase in visitors from any particular distance band. For example, if the number of houses doubled in a particular distance band the number of visitors from that area would also double" (A§5.5.6). We agree with this. It is a pity that this logic can't also be applied to the impact on the Deben Estuary of the 2,000 houses proposed for Adastral Park. The calculation method described in A§5.5.9 and A§5.10 seems to be far more realistic than those used in A§5.3 (criticised above), and there seems to be no good reason why it couldn't also be applied the Adastral Park - Deben Estuary situation if basic data on visitor numbers were known. |

"The distribution of proposed housing is not precisely specified within the Core Strategies." (A§5.5.7) This is not entirely true. One of our main complaints about the SCDC LDF Core Strategy is that it is very site-specific. 2,000 houses 'to the south and east of Adastral Park' could hardly be more site-specific. |

In A§5.5.12 the increase in the number of visitors to the South Sandlings area as a result of the Ipswich and Suffolk Coastal Core Strategies is predicted to be 8.8% (broadened to 6-12% in A§5.5.14). Most of the housing proposed in these Core Strategies is far nearer to the Deben Estuary than it is to the South Sandlings area, so one would expect the increase in the number of visitors to the former to be far greater than 8.8%. Nowhere is this obvious conclusion stated. (No estimate is given for the increase in the number of visitors to the Deben Estuary as a result of the Ipswich and Suffolk Coastal Core Strategies, which is a pity as this is the SPA most affected by the extra housing.) |

* "New’ people in the Borough / District will have the same visiting pattern as ’existing’ people" This is very unlikely - see comments on A§5.3.14, first bullet point |
| 1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland |
| 2. the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben. |
| Throughout A§5.6 various references are made to the ridiculous claims that people are unlikely to walk further than 1km or drive further than 8km. For example: "...only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur..." (A§5.6.6). These are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed. The 1km figure is invalid because: |
| 1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland |
| 2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked less than 1km was that they lived less than 1km from the site, so didn't need to walk further. |
| 3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub. |
| 4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it. |

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The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. The inappropriateness of the 1km figure is borne out by the Deben Estuary Survey, which shows that 57.1% (far more than the 11% in Dorset) of visitors to the River Deben who arrived on foot walked more than 1km (Deben Estuary Survey, A§2.19). The average distance travelled by people on foot (3.8km) easily puts the Deben Estuary SPA within the orbit of the proposed LDF Core Strategy site at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption. “The allocation east of Ipswich around Martlesham could be close to the Deben Estuary SPA” (A§6.6.7). The allocation east of Ipswich around Martlesham is close to the Deben Estuary SPA - it is 1.8km away (as the crow flies). The use of the term ‘could be’ is disingenuous - it implies there is some leeway in where the housing goes, which isn’t the case. The LDF Core Strategy specifies ‘To the south and east of Adastral Park’ which can only mean one thing - BT’s land (see BT’s planning application C09/0555).

“The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings” (A§5.8.5). Whilst this is factually correct, its significance is questionable, as the Deben Estuary Survey did not cover the winter period, it simply asked interviewees if they also visited in the winter. “The Deben Estuary visitor survey … does not have the data or analysis to predict changes in visitor numbers” (A§5.8.8). This is partly true, a more comprehensive survey carried out by professionals would be needed for that. The survey says: “We hope that the data we have collected is helpful in providing some baseline information from which further studies can be conducted or more realistic projections made regarding increased visitor numbers resulting from the Adastral Park, Martlesham development and the consequent impact on the wildlife.” (Deben Estuary visitor survey, A§1.9). The point is that the Appropriate Assessment makes predictions of increases to visitor numbers without any data on current visitor numbers, so although the Deben Estuary visitor survey isn’t scientifically rigorous, it is better than nothing. A§6.2 Policy SP2. Housing numbers

Point 6. Summary:
The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The conclusion that it is unlikely that many visitors would walk from their homes to the Deben Estuary SPA at Martlesham, and that it is expected there will be no new high levels of disturbance, are based on the flawed assumption that people won’t walk more than 1km and an unrealistic reliance on greenspace provision. “… the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk” There is nothing wrong with the estuary-side path, it is perfectly walkable for about 2.5km up to the breach opposite Methersgate Quay.

We agree with most of A§6.2.28, although the location of the proposed housing is known precisely - it is ‘To the south and east of Adastral Park’ see comments on A§5.6.7, above. We agree with the conclusion in A§6.2.30: “It therefore cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA near Martlesham.” However, this is then contradicted in A§6.2.31: “Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the greenspace provision is adequate, it is unlikely that many visitors would walk from their home to the estuary, so this recreational activity would not substantially increase on the foreshore of Deben Estuary SPA at Martlesham, and there is expected to be no new high levels of disturbance …”. The assumption that people won’t walk more than 1km is invalid (see our comments on A§6.6, above), and the reliance on greenspace provision is equally flawed (even if the greenspace appears in time, which is doubtful) - see our comments on A§7, below. The Deben Estuary Survey showed that 32% of visitors walked on foot more than 3km to the Deben Estuary at Martlesham (Deben Estuary Survey, A§2.19).

“It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2 - 2.5km from the Martlesham church car park (The Deben Estuary Visitor Survey by NANT of July 2011 gives 2.5km).” (A§6.2.34) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 1.6km and 3.0km respectively (Deben Estuary Survey, A§3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.2km.

Point 7. Summary:
The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren’t necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as ‘lost due to erosion’ is grossly misleading. These paths are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

“This limit to parking suggests that there is limited availability for an increase in visitors arriving by car to Waldringfield.” “Given the limit to available parking the increase in visitors walking along the estuary might be less than that predicted.” (A§6.2.35) Obviously the parking space is ‘limited’, i.e. it isn’t infinite! In fact there is space for about 75 cars in the public parking area and about 22 in the patrons only area. However, too much emphasis has been placed on the "limit to available parking" - this only applies at peak times, most of the year there is plenty of space. A letter to the Chair of Waldringfield PC from the manager of the Maybush, dated 16/2/10 says: “… the car park, generally, is not at capacity at any other time than school holidays, bank holidays and weekends. It is however often at capacity during these times out of our hours i.e. before 11am if the weather is fine and/or there is an event on at the sailing club.” When the car park is full visitors aren’t necessarily deterred - it is common for visitors to park in Cliff Road, and recently in Church Field Car Park, causing extra congestion (Cliff Road is narrow and single lane in places).

“it is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2.5 - 3km from the Deben
5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

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5 - Methods of assessing European site visitor increases and an increased human population

estuary at Waldringfield (The Deben Estuary Visitor Survey by NANT of July 2011 gives 3km).” (§6.2.35) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 2.0km and 2.5km respectively (Deben Estuary Survey, §3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.1km.

"Estuary-side footpaths north and south of Waldringfield are eroded and impassable, according to data received from Suffolk County Council in August 2011 (see Figure 03). This limits the walking routes available from Waldringfield.” (§6.2.36). Figure 03 shows thefootpath extending about 1km north of Manor House and about 1.5km south of the reservoir as ‘Section lost due to erosion’. This is completely untrue and is grossly misleading. In fact the path north of Waldringfield is breached opposite Metersgate Quay about 2/3 of the way along the section shown as ‘lost’, and the path south of Waldringfield is breached just beyond Early Creek, at the southern end the section shown as ‘lost’. In places these paths can get muddy in poor weather, but otherwise are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

Point 8, Summary: The conclusion that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA is based on the invalid assumption that people won’t walk more than 1km, and the unrealistic reliance on greenspace provision.

"It can be ascertained that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA, given a location well over 1km from the estuary and with adequate greenspace provision.” (§6.2.42). This is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on §5.6), and the unrealistic reliance on greenspace provision - see our comments on §7.

"It is therefore concluded that there would be no adverse affect upon the integrity of the respective European sites.” (§6.2.45). Again, this is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on §5.6), and the unrealistic reliance on greenspace provision - see our comments on §7.

Point 10, Summary: The Appropriate Assessment places great reliance on the creation of a new country park as mitigation. This is despite the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Even if a site is found it will not have any of the attractive features of the Deben Estuary, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

The Appropriate Assessment places great reliance on the creation of a new country park, which it claims will provide mitigation by diverting visitors (and particularly dog walkers) away from the Deben Estuary. No specific site is suggested, although a location vaguely described as "to the north or north-east of Ipswich" is proposed (§7.2.10).

However, no mention is made of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

Various wish-lists of desirable features of this mitigating greenspace are presented throughout §7.2. However, the ones that could actually attract visitors away from the Deben Estuary are conspicuous by their absence. Most people who visit the Deben Estuary do so because of the river. They walk along its banks, their children play on the beach and swim in the river, they sail, fish, birdwatch and engage in many other river-based activities, and of course the Maybush at Waldringfield attracts people from far and wide. A country park will not have any of these attractive features, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

There isn’t an abundance of suitable sites “to the north or north-east of Ipswich”. The phrase “to the north or north-east of Ipswich” suggests that it is likely that the site will be west of the A12, and if this is the case then the Deben Estuary will be far more accessible to the residents of the proposed Adastral Park development than the mitigation site, as the A12 presents a significant barrier to walkers.

Following the dubious logic of the Appropriate Assessment, if the mitigating greenspace is more than 1km from the development, visitors are unlikely to walk there. A circle of radius 1km from Adastral Park barely reaches beyond Martlesham Heath to the west or Tesco’s car park to the north, an area that contains no significant candidate spaces, so it is difficult to see where this greenspace could come from. Unless, that is, people are expected to drive to the mitigation site, in which case it won’t have any effect on visitors going to the Deben Estuary on foot, but will increase traffic congestion west of the A12.

Recent evidence from Dorset casts serious doubt on the effectiveness of alternative greenspace in mitigating against increases in visitors to environmentally sensitive sites: “Almost all responding households had some ‘Other’ greenspace within 1.5km. The presence of this ‘Other’ greenspace had no apparent effect on reducing either the likelihood or frequency of visiting heaths... Some of the results suggest that people with more greenspace surrounding their homes may actually visit heaths more... The most critical conclusion is that there appears to be only a slender relationship between the amount of (existing) alternative greenspace nearby and the amount of heathland visits” (East Dorset District Council Public Report - Household Survey, Footprint Ecology, May 2009, p27).

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
No change has been made to the conclusions on mitigation (§7.4): "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This of course depends on the mitigation being implemented and available at the start of house building. However, even if it is, it is highly unlikely that "the impacts of additional housing provisions in Policy SP2 and related policies ... will be reduced to an insignificant level" (§7.4.1). Where is the evidence that this (as yet hypothetical) mitigation will reduce the 'adverse effect' to an 'insignificant level'? The current number of visitors to the European sites isn't even known, and the increase isn't known either, so how can it be said with confidence that this increase will be eradicated with appropriate mitigation? It is pure speculation, without any basis in fact.

.§8 Conclusions

Point 11, Summary:
Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

"It is concluded that policy SP2 would have an adverse effect upon the integrity of a number of European sites, alone and in combination with the Ipswich Borough Core Strategy and Policies." (§8.6.1). This we do agree with. "Mitigation is proposed which, if implemented, would reduce the adverse effect to an insignificant level and would enable a conclusion that can be ascertained that there will be no adverse effect upon the integrity of any European site." (§8.6.1). As explained above, given that no sites or funding have been found, mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. We believe there is no justification for this optimism, and that it is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

.§9.2 Further work needed

Point 12, Summary:
It is claimed that further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. Yet it is acknowledged that the data upon which major decisions have been based is poor. No attempt will be made to get better data before the decisions are formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions. This is not how decision making is supposed to work.

"Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected." (§9.1.1). This decision was made in 2009. If SCDC had instead decided to commission a proper visitor survey at that time, it would probably be complete by now (2 years later), and could have provided a far more reliable basis for assessing the impact of the housing proposed in the Ipswich Borough and Suffolk Coastal Core Strategies.

Having acknowledged that the data is poor, the Appropriate Assessment makes the highly dubious claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." (§9.2.3) So a major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions.

Summary:
Point 3, Summary:
The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing 5% as the upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.
Respondent: Waldringfield Parish Council (Mrs Jean Potter) [509]  
Agent: N/A

Full Text:  

5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

Towards A§5.3 (Calculations to predict additional visitors to European sites across the Suffolk Coast and Heaths AONB using Tourist Board data) the distinction between the AONB and the European Sites is regularly confused. For example:

* in A§5.3.5 it says: "Many of the sites in the AONB involved in the visitor study were European sites, so the study is relevant to this Appropriate Assessment." The AONB (2004) study makes no mention of (and certainly does not ‘involve’) any environmentally designated sites, European or otherwise.

* in A§5.3.21 it says: "... roughly one-quarter of all visits to the AONB originate from Ipswich Borough and Suffolk Coastal District. This assumption is also applied to the European sites within the AONB." On what basis is this assumption also applied to European sites within the AONB?

* in A§5.3.18 it says: "Table 6 shows that the increase in visitors to the Suffolk Coast and Heaths AONB, as a result of the proposed developments is predicted to be 2.83%." In A§5.3.25 it says: "To allow for these assumptions, the approximate 2.83% increase in total visitors to the AONB is given as a range of 2% - 5%." (our emphasis). Both of these refer to the AONB, not any European Site or Sites. But then in A§5.3.26 it says: "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% ..." No justification is given for jumping from a conclusion about visitors to the AONB to one about visitors to European Sites.

Not only is there a confusion between the AONB and European Sites within the AONB, but no attempt is made in A§5.3 to distinguish between the individual European Sites. For example, the Deben Estuary SPA is obviously more likely to receive a greater increase in visitors due the proposed housing at Adastral Park than more northerly sites such as the Minsmere-Walberswick SPA, but this is not mentioned. (The discussion of the South Sandlings Survey in A§5.5 rectifies this for the European Sites within the survey area, but of course this does not cover the Deben Estuary, and it does not clarify the confusion in A§5.3.)

Point 1, Summary:

There is no up to date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites of concern to the Appropriate Assessment. Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"There is a limited amount of data regarding the quantity of visitors to European sites" (A§5.1.10). Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available, and can be used to predict increases in visitor numbers from new housing." (A§5.3.1.10). This survey covers the AONB as a whole. It makes no mention of the Deben Estuary SPA/SSSI/RAMSAR Site. Neither does it mention the other SSSIs near to Adastral Park/ (Newbourne Springs, Ipswich Heaths and Sink Valley, Kesgrave), because they are not in the AONB.

The only interview locations on the River Deben are at Melton and Bawdsey, which are irrelevant to the proposed housing at Adastral Park and Felixstowe. All the interviews were conducted in August, none in spring, autumn or winter. These facts make the AONB 2004 survey completely irrelevant to any prediction of increases in visitor numbers from new housing. In particular, the phrase "can be used to predict increases in visitor numbers from new housing" refers to visitors to the European Sites potentially affected, as listed in A§2.1.2. In A§2 (European sites potentially affected) it makes no mention of the AONB.

In §5.3.9 the figure of 1.57 is explained: "This is not an assumption about the occupancy rate of new dwellings, in Suffolk Coastal is supposed to be 1.57. This is more realistic than the previous figure of 0.9, but is still seriously flawed. It comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at.

Not only is there a confusion between the AONB and European Sites within the AONB, but no attempt is made in A§5.3 to distinguish between the individual European Sites. For example, the Deben Estuary SPA is obviously more likely to receive a greater increase in visitors due the proposed housing at Adastral Park than more northerly sites such as the Minsmere-Walberswick SPA, but this is not mentioned. (The discussion of the South Sandlings Survey in A§5.5 rectifies this for the European Sites within the survey area, but of course this does not cover the Deben Estuary, and it does not clarify the confusion in A§5.3.)

Point 2, Summary:

The estimate of the net increase in people for the East Ipswich Plan Area, based as it is on 1.57 new people per dwelling, is a serious under-estimate. The figure of 1.57 comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. It contains the absurd hidden assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding. There is no evidence that there is any overcrowding in these villages.

In A§5.3.7 to A§5.3.13, and particularly in Table 3, an attempt is made to estimate the increase in population due to the proposed housing. To do this it uses the ‘number of new people per new dwelling’, which in Suffolk Coastal is supposed to be 1.57. This is more realistic than the previous figure of 0.9, but is still seriously flawed. It comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. According to the Oxford Economics Study the occupancy rate in the East was 2.31 (in 2009) decreasing to 2.22 (in 2027), giving an average of 2.27. (p34)

In A§5.3.9 the figure of 1.57 is explained: "This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy." It is extremely unlikely that any of the 2,000 dwellings proposed for Adastral Park will be bought for holiday homes, so the difference between the 4,540 (2,000x2.27) new occupants and the 3,140 (2,000x1.57) new people to the area must be accounted for by assuming that 1,400 (4,540-3,140) people will move to Adastral Park because of the fragmentation of multiple person households in the area, and so will not be adding to the number of extra people living near the Deben Estuary. This dubious assumption is not explained or even mentioned, let alone properly justified. It is in fact totally implausible: In order for an occupant of the new housing at Adastral Park not to count as a ‘new’ additional person, he/she must:
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1. move to Adastral Park from somewhere at least equally near the Deben Estuary (approximately)
2. move out of a multiple person household into one with the same or lower occupancy at Adastral Park
3. not be replaced by anyone moving into the area from further afield
4. not be part of a house-moving chain involving anyone moving into the area from further afield

The only places that qualify for inclusion in (1) are: Waldringfield, Newbourne, Hamley, Brightwell, Martlesham Village and Martlesham Heath (just). Kesgrave and Grange Farm are roughly twice the distance from the Deben Estuary so can be excluded, and Woodbridge can be excluded because although it is on the River Deben, it is not on a sensitive part: "the Deben Estuary is not assessed by Natural England as being unfavourable due to human disturbance" (Ã§6.2.35). The combined populations of these 6 villages is 6,630, so the Appropriate Assessment contains the absurd hidden assumption that 1,400 (21%) of the residents of these villages will move to Adastral Park because of pressures of overcrowding. There is no evidence that there is any overcrowding in these areas, or that there is any desire for the residents to move to the proposed housing at Adastral Park - the idea is quite ludicrous.

The upshot of this is that the figure of 3,462 for the 'Estimated net increase in people' for the East Ipswich Plan Area, (Table 3), based as it is on 1.57 new people per dwelling, is a serious underestimate. It is far more likely that the entire population of the 2,000 new houses at Adastral Park will come from outside the immediate area, and will be about 4,540 (2,000x2.27).

The same critical comment can be applied to the Felixstowe, Walton and the Trimleys figure of 2,763 (Table 3). Point 3, Summary:

The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing the upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.

The actual increase in the number of people visiting the sites is not given, but because the number of visitors is not known (because of the lack of a proper survey - see above).

The assumptions given in §5.3.14 are all highly dubious (except one):

* "the pattern of day visits to sites by the new residents is similar to that of the existing population" This is very unlikely.
* the proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries.
* "the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey" It is not clear if 'sites' is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.
* "an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity" OK, this is an acceptable assumption.
* "the relative proportions of day visitors and overnight visitors does not change" Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase.
* "the summer snapshot survey is typical of visitors all year round." This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to - be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

Table 4 (Ã§5.3.13), second column reads 'Estimated increase in people (table 2)'. The data is actually taken from Table 3.

Table 5 (Ã§5.3.16), second column reads 'proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1'. The data is actually taken from Table 2.

The calculations in Table 5 and described in §5.3.15 are an attempt to predict the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as stated in the title of Table 6. However, in several places the restriction (in bold above) is not made clear, for example in §5.3.14-16. This gives the impression that it predicts the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from all potential sources. 50.5% of the total day visitors to the AONB come from outside Suffolk Coastal and Ipswich Borough/Pinewood. Increases in the populations in the areas these people come from have been excluded from the calculations. This is unrealistic - Babergh, Tendring, Waveney and all the other nearby districts all have LDF Core Strategies that propose large housing allocations and correspondingly large increases in populations. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as described in §5.3.15 and shown in Table 5, is logically flawed. Column A only includes day visitors who live in Suffolk Coastal and Ipswich Borough/Pinewood. In Column B this is multiplied by the proportion of visitors who are day visitors (55%). However, the figure of 55% applies to visitors from all locations, not just those from Suffolk Coastal and Ipswich Borough/Pinewood. Common sense tells us that local this is more realistic to have different multipliers for the different areas - for example we know that about 95% of visitors to Martlesham are on day trips (Suffolk Coast and Heaths AONB Survey (2004) Chart 3), so if most of these came from...
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5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

the East Ipswich Plan Area we could use 95% as the multiplier in Column B, 2nd row.

Two of the three assumptions given in Â§5.3.23 are highly dubious:
* "'New' people in the Borough / District will have the same visiting pattern as 'existing' people" This is very unlikely - see comments on Â§5.3.14, first bullet point
* "Visits by holiday makers will not be affected by any increased use by local visitors" It is possible that overcrowding at popular sites will put off holidaymakers. Holiday makers generally want to visit unspoiled countryside; the urbanisation resulting from the housing allocations, particularly at Adastral Park, is very likely to deter holidaymakers.

4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially
3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked
2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely
1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland

The uncertainties in the calculations are acknowledged by the vagueness of the conclusion (Â§5.3.26): "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% as a result ...

The uncertainties in the calculations are acknowledged by the vagueness of the conclusion (Â§5.3.26): "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% as a result ... " It would also be reasonable to assume that the increase is far higher than 5%. What justification is there for choosing 5% as the upper limit rather than, say, 10%? The flaws in the methodology, the likelihood that the assumptions in Â§5.3.14 and Â§5.3.23 are invalid, and the inappropriateness of using the Suffolk Coast and Heaths AONB Survey (2004) results in the first place all combine to make this conclusion completely worthless.

Point 4, Summary: The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the proposed new housing in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area than the average across the AONB. One would expect the increase in the Orwell and Deben Estuary SPAs to be far greater than the 8.8% estimated for the South Sandlings area. Nowhere is this obvious conclusion stated.

Another reason the figure of 2-5% is worthless is that it is an average across the whole of the AONB. 77% of the proposed new housing is in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area, all of which are far closer to the Orwell and Deben Estuaries than the other European Sites in the AONB, and these sites will therefore receive a far greater increase in visitors than the average across the whole of the AONB. Even if the figure of 2-5% is correct it tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs. This point is made in Â§5.8.1 with regard to the South Sandlings area "Fewer people living in or east of Ipswich might visit distant parts of the AONB compared to the South Sandlings, thus having a smaller impact over the AONB", but unfortunately the obvious extension of this argument to the Deben and Orwell Estuaries hasn't been made.

"It is a reasonable assumption that an increase in dwellings would generate a proportionate increase in visitors from any particular distance band. For example, if the number of houses doubled in a particular distance band the number of visitors from that area would also double" (Â§5.5.6). We agree with this. It is a pity that this logic can't also be applied to the impact on the Deben Estuary of the 2,000 houses proposed for Adastral Park. The calculation method described in Â§5.5.9 and Â§5.10 seems to be far more realistic than those used in Â§5.3 (criticised above), and there seems to be no good reason why it couldn't also be applied the Adastral Park - Deben Estuary situation if basic data on visitor numbers were known.

"The distribution of proposed housing is not precisely specified within the Core Strategies." (Â§5.5.7) This is not entirely true. One of our main complaints about the SCDC LDF Core Strategy is that it is very site-specific. 2,000 houses 'to the south and east of Adastral Park' could hardly be more site-specific.

In Â§5.5.12 the increase in the number of visitors to the South Sandlings area as a result of the Ipswich and Suffolk Coastal Core Strategies is predicted to be 8.8% (broadened to 6-12% in Â§5.5.14). Most of the housing proposed in these Core Strategies is far nearer to the Deben Estuary than it is to the South Sandlings area, so one would expect the increase in the number of visitors to the former to be far greater than 8.8%. Nowhere is this obvious conclusion stated.

(Point estimate is given for the increase in the number of visitors to the Deben Estuary as a result of the Ipswich and Suffolk Coastal Core Strategies, which is a pity as this is the SPA most affected by the extra housing.)

Point 5, Summary: The claim that people are unlikely to walk further than 1km is absurd. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.

Throughout Â§5.6 various references are made to the ridiculous claims that people are unlikely to walk further than 1km or drive further than 8km. For example: "...only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur..." (Â§5.6.6). These are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed.

The 1km figure is invalid because:
1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked less than 1km was that the Deben is less than 1km from the site, so didn't need to walk further.
3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Appropriate Assessment for Core Strategy (August 2011)

4079 Comment

5 - Methods of assessing European site visitor increases form an increased human population

5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. The inappropriateness of the 1km figure is borne out by the Deben Estuary Survey, which shows that 57.1% (far more than the 11% in Dorset) of visitors to the River Deben who arrived on foot walked more than 1km (Deben Estuary Survey, A§2.19). The average distance travelled by people on foot (3.8km) easily puts the Deben Estuary SPA within the orbit of the proposed LDF Core Strategy site at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption. "The allocation east of Ipswich around Martlesham could be close to the Deben Estuary SPA" (A§5.6.7). The allocation east of Ipswich around Martlesham is close to the Deben Estuary SPA - it is 1.8km away (as the crow flies). The use of the term 'could be' is disingenuous - it implies there is some leeway in where the housing goes, which isn't the case. The LDF Core Strategy specifies 'to the south and east of Adastral Park' which can only mean one thing - BT's land (see BT's planning application C09/0555).

"The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings" (A§5.8.5). Whilst this is factually correct, its significance is questionable, as the Deben Estuary Survey did not cover the winter period, it simply asked interviewees if they also visited in the winter. "The Deben Estuary visitor survey ... does not have the data or analysis to predict changes in visitor numbers" (A§5.8.8). This is partly true, a more comprehensive survey carried out by professionals would be needed for that. The survey says: "We hope that the data we have collected is helpful in providing some baseline information from which further studies can be conducted or more realistic projections made regarding increased visitor numbers resulting from the Adastral Park, Martlesham development and the consequent impact on the wildlife." (Deben Estuary visitor survey, A§1.9). The point is that the Appropriate Assessment makes predictions of increases to visitor numbers without any data on current visitor numbers, so although the Deben Estuary visitor survey isn't scientifically rigorous, it is better than nothing.

A§6.2 Policy SP2. Housing numbers

Point 6, Summary:
The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The conclusion that it is unlikely that many visitors would walk from their homes to the Deben Estuary SPA at Martlesham, and that it is expected there will be no new high levels of disturbance, are based on the flawed assumption that people won't walk more than 1km and an unrealistic reliance on greenspace provision.

"... the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk" There is nothing wrong with the estuary-side path, it is perfectly walkable for about 2.5km up to the breach opposite Methersgate Quay. We agree with most of A§6.2.28, although the location of the proposed housing is known precisely - it is 'to the south and east of Adastral Park' see comments on A§5.6.7, above. We agree with the conclusion in A§6.2.30: "It therefore cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse effect upon the integrity of Deben Estuary SPA near Martlesham". However, this is then contradicted in A§6.2.31: "Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the greenspace provision is adequate, it is unlikely that many visitors would walk from their home to the estuary, so this recreational activity would not substantially increase on the foreshore of Deben Estuary SPA at Martlesham, and there is expected to be no new high levels of disturbance ...". The assumption that people won't walk more than 1km is invalid (see our comments on A§6.6 above), and the reliance on greenspace provision is equally flawed (even if the greenspace appears in time, which is doubtful) - see our comments on A§7, below. The Deben Estuary Survey showed that 32% of visitors on foot walked more than 3km to the Deben Estuary at Martlesham (Deben Estuary Survey, A§2.19).

"It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2 - 2.5km from the Martlesham church car park (The Deben Estuary Visitor Survey by NANT of July 2011 gives 2.5km). ' (A§6.2.34) It depends on whether this distance is 'as the crow flies' or by the shortest road route. The Deben Estuary Survey actually states them as 1.6km and 3.0km respectively (Deben Estuary Survey, A§3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.2km.

Point 7, Summary:
The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren't necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as 'lost due to erosion' is grossly misleading. These paths are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

"This limit to parking suggests that there is limited availability for an increase in visitors arriving by car to Waldringfield..." "Given the limit to available parking the increase in visitors walking along the estuary might be less than that predicted." (A§6.2.35) Obviously the parking space is 'limited', i.e. it isn't infinite! In fact there is space for about 75 cars in the public parking area and about 22 in the patrons only area. However, too much emphasis has been placed on the "limit to available parking" - this only applies at peak times, most of the year there is plenty of space. A letter to the Chair of Waldringfield PC from the manager of the Maybush, dated 16/2/10 says: "... the car park, generally, is not at capacity at any other time than school holidays, bank holidays and weekends. It is however often at capacity during these times out of our hours i.e. before 11am if the weather is fine and/or there is an event on at the sailing club." When the car park is full visitors aren't necessarily deterred - it is common for visitors to park in Cliff Road, and recently in Church Field Car Park, causing extra congestion (Cliff Road is narrow and single lane in places).

"It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2.5 - 3km from the Deben
estuary at Waldringfield (The Deben Estuary Visitor Survey by NANT of July 2011 gives 3km).” (Å6.2.35) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 2.0km and 2.5km respectively (Deben Estuary Survey, Å§3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.1km.

"Estuary-side footpaths north and south of Waldringfield are eroded and impassable, according to data received from Suffolk County Council in August 2011 (see Figure 03). This limits the walking routes available from Waldringfield." (Å6.2.36). Figure 03 shows the footpath extending about 1km north of the Manger, and about 1.5km south of the reservoir as ‘Section lost due to erosion’. This is completely untrue and is grossly misleading. In fact the path north of Waldringfield is breached opposite Metersgate Quay about 2/3 of the way along the section shown as ‘lost’, and the path south of Waldringfield is breached just beyond Early Creek, at the southern end the section shown as ‘lost’. In places these paths can get muddy in poor weather, but otherwise are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

Point 8, Summary:
An allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA based on the invalid assumption that people won’t walk more than 1km, and the unrealistic reliance on greenspace provision.

"It can be ascertained that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA, given a location well over 1km from the estuary and with adequate greenspace provision." (Å6.2.42). This is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on Å§5.6), and the unrealistic reliance on greenspace provision - see our comments on Å§7.

Point 9, Summary:
No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment.

No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is important because: "On one estuarine site, disturbance to birds from boats was thought to be the biggest problem" (Å§5.7.6). Motor boats and jet skis, which create a large wake, also contribute to erosion of the river banks, endangering the delicate saltmarsh ecosystem. This is a serious omission from the Appropriate Assessment.

Å7 Mitigation

Point 10, Summary:
The Appropriate Assessment places great reliance on the creation of a new country park as mitigation. This is despite the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Even if a site is found it will not have any of the attractive features of the Deben Estuary, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

The Appropriate Assessment places great reliance on the creation of a new country park, which it claims will provide mitigation by diverting visitors (and particularly dog walkers) away from the Deben Estuary. No specific site is suggested, although a location vaguely described as “to the north or north-east of Ipswich” is proposed (Å7.2.10). However, no mention is made of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

Various wish-lists of desirable features of this mitigating greenspace are presented throughout Å7.2. However, the ones that could actually attract visitors away from the Deben Estuary are conspicuous by their absence. Most people who visit the Deben Estuary do so because of the river. They walk along its banks, their children play on the beach and swim in the river, they sail, fish, birdwatch and engage in many other river-based activities, and of course the Maybush at Waldringfield attracts people from far and wide. A country park will not have any of these attractive features, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

There isn’t an abundance of suitable sites “to the north or north-east of Ipswich”. The phrase “to the north or north-east of Ipswich” suggests that it is likely that the site will be west of the A12, and if this is the case then the Deben Estuary will be far more accessible to the residents of the proposed Adastral Park development than the mitigation site, as the A12 presents a significant barrier to walkers.

Following the dubious logic of the Appropriate Assessment, if the mitigating greenspace is more than 1km from the development, visitors are unlikely to walk there. A circle of radius 1km from Adastral Park barely reaches beyond Martlesham Heath to the west or Tesco’s car park to the north, an area that contains no significant candidate spaces, so it is difficult to see where this greenspace could come from. Unless, that is, people are expected to drive to the mitigation site, in which case it won’t have any effect on visitors going to the Deben Estuary on foot, but will increase traffic congestion west of the A12.

Recent evidence from Dorset casts serious doubt on the effectiveness of alternative greenspace in mitigating against increases in visitors to environmentally sensitive sites: "Almost all responding households had some ‘Other’ greenspace within 1.5km. The presence of this ‘Other’ greenspace had no apparent effect on reducing either the likelihood or frequency of visiting heaths.... Some of the results suggest that people with more greenspace surrounding their homes may actually visit heaths more... The most critical conclusion is that there appears to be only a slender relationship between the amount of (existing) alternative greenspace nearby and the amount of heathland visits" (East Dorset District Council Public Report - Household Survey, Footprint Ecology, May 2009, p27).

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No change has been made to the conclusions on mitigation (§7.4): "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This of course depends on the mitigation being implemented and available at the start of house building. However, even if it is, it is highly unlikely that "the impacts of additional housing provisions in Policy SP2 and related policies ... will be reduced to an insignificant level" (§7.4.1). Where is the evidence that this (as yet hypothetical) mitigation will reduce the 'adverse effect' to an 'insignificant level'? The current number of visitors to the European sites isn't even known, and the increase isn't known either, so how can it be said with confidence that this increase will be eradicated with appropriate mitigation? It is pure speculation, without any basis in fact.

§8 Conclusions

Point 11, Summary:
Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

"It is concluded that policy SP2 would have an adverse effect upon the integrity of a number of European sites, alone and in combination with the Ipswich Borough Core Strategy and Policies." (§8.6.1). This we do agree with.

"Mitigation is proposed which, if implemented, would reduce the adverse effect to an insignificant level and would enable a conclusion that it can be ascertained that there will be no adverse effect upon the integrity of any European site." (§8.6.1). As explained above, given that no sites or funding have been found, mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. We believe there is no justification for this optimism, and that it is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

§9.2 Further work needed

Point 12, Summary:
It is claimed that further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. Yet it is acknowledged that the data upon which major decisions have been based is poor. No attempt will be made to get better data before the decisions are formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions. This is not how decision making is supposed to work.

"Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected." (§9.1.1). This decision was made in 2009. If SCDC had instead decided to commission a proper visitor survey at that time, it would probably be complete by now (2 years later), and could have provided a far more reliable basis for assessing the impact of the housing proposed in the Ipswich Borough and Suffolk Coastal Core Strategies.

Having acknowledged that the data is poor, the Appropriate Assessment makes the highly dubious claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." (§9.2.3) So a major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions.

Summary:
The claim that people are unlikely to walk further than 1km is absurd. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.
WE OBJECT to the findings in the revised AA and SA dated August 2011.

The issues identified in my previous consultation responses have not been addressed by the revisions in the AA and SA.

In addition, the AA still gives inappropriate weight to out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions.

An essential piece of the so called "suite of mitigation measures" is a new country park. No site has been identified or costed - there is no evidence that this will materialise.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Mr & Mrs D Cutler Waldringfield

In addition, the AA still gives inappropriate weight to out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions.

Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I OBJECT to the findings in the revised AA and SA - August 2011.

On previous related consultations I have submitted issues but these have not been addressed by these revisions in the AA and SA.

The data being quoted is still inaccurate - and worse, is now very out of date.

Please include recent detailed studies with more accurate information such as the Deben Visitor Survey and South Sandlings Survey within the conclusions.

The LDF requires much further debate, to ensure that it adequately protects environmentally sensitive, unique and internationally protected sites, and does not merely pretend to cover this all with some sort of unproven ‘mitigation’.

Regards
Margaret
M Wilson
5 Lancaster Drive
IP5 3TJ

Summary:
I OBJECT to the findings in the revised AA and SA - August 2011.

On previous related consultations I have submitted issues but these have not been addressed by these revisions in the AA and SA.

The data being quoted is still inaccurate - and worse, is now very out of date.

Please include recent detailed studies with more accurate information such as the Deben Visitor Survey and South Sandlings Survey within the conclusions.
Appropriate Assessment for Core Strategy (August 2011)

4114  Object
5 - Methods of assessing European site visitor increases form an increased human population
5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

Respondent:  Mr and Mrs Stone [2012]  Agent:  N/A

Full Text:
To whom it may concern

Firstly I would like to say I have had enormous problems trying to navigate my way into your online complaints/objection procedure as I know others have as well. Is this intentional. I was given a direct email link and was unable to use this development.policy@suffolkcoastal.gov.uk , “this page cannot be displayed”.

I OBJECT to the findings in the revised AA and SA dated August 2011.

The issues identified in my previous consultation responses have not been addressed by the revisions in the AA and SA.

In addition, the AA still gives inappropriate weight to out of date and irrelevant data.

New data, such as the South Sandlings Survey and the Deben Visitor Survey, which I and several others took many hours in the freezing cold talking to visitors and collecting information about the wild life and habitats of the Deben have been acknowledged, but then ignored in the conclusions.

An essential piece of the so called “suite of mitigation measures” is a new country park. No site has been identified or costed - there is no evidence that this will materialise.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Finally I would like to point out, there are numerous bridlepaths running around and through the BT land. As you probably know there are very few places for horse riders to be able to get off the roads. Under no circumstances would I want to see the loss of any of these paths, or the re direction nor would I wish to see the surfaces tarmac or signs being displayed no cantering etc etc.

Summary:
I OBJECT to the findings in the revised AA and SA dated August 2011.

In addition, the AA still gives inappropriate weight to out of date and irrelevant data.

New data, such as the South Sandlings Survey and the Deben Visitor Survey, which I and several others took many hours in the freezing cold talking to visitors and collecting information about the wild life and habitats of the Deben have been acknowledged, but then ignored in the conclusions.

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Attachments:

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I OBJECT to the conclusions of both the Appropriate Assessment and Sustainability Appraisal. The Appropriate Assessment draws wide-ranging conclusions which are based on out-of-date and largely irrelevant data, absurd assumptions and flawed logic. No attempt has been made to find out basic information such as the current number of visitors to the Deben and Orwell Estuaries. Far too much reliance is placed on mitigation to magically turn an ‘adverse effect upon the integrity of a number of European sites’ into an ‘insignificant level’ with ‘no adverse effect upon the integrity of any European site.’ (§8.6.1).

The Sustainability Appraisal also places far too much reliance on mitigation, ignoring the fact that a mitigation site hasn’t been found, is unfunded and is unlikely to deter visitor for going to the Deben and Orwell Estuaries even if it does materialise on time.

All the points I have made in previous consultation responses still stand.

Detailed Comments

Sustainability Appraisal

Many of SCDC's responses to the consultation comments are inadequate. I will however only comment on the response to my own consultation comments (RepId: 3354):

My Comments

The Sustainability Appraisal should have been rewritten in the light of the potentially significant changes to the LDF Core Strategy. Admittedly, very little has actually changed, but that is not the point - the removal of the RSS has opened up many new possibilities which should have been evaluated for sustainability. For example, the constraints on the housing numbers and their distribution between the IPA [now the EIPA] and the rest of the district have been completely removed. No assessment of the sustainability of a more even housing distribution or a variety of different overall housing numbers has been done.

SCDC's Response

Noted. New options for housing pending the abolition of the RSS have not been presented for appraisal. The Council has looked at the new evidence gathered and decided on an appropriate housing number and distribution. No change to the SA required.

My Response to SCDC's Response

SCDC's response completely misses the point: the sustainability of all the options should have been assessed, and the decisions about housing numbers and distribution based on those assessments. Instead, these decisions were made without any regard to the sustainability of the various options.

Policy SP20 is not more sustainable

The policy SP20 Ipswich Policy Area is described as marginally more sustainable, on the basis of the creation of a country park at the Foxhall Tip. But this is unlikely to be developed within the plan period, so the policy could not have become more sustainable.

The Area Action Plan will not solve the problem of traffic congestion or safeguard the designated wildlife areas

The idea that an Area Action Plan will solve these problems is absurd. By the time it is produced it will be too late - the decision to build 2,000 houses at Martlesham will already have been adopted, and it is likely that planning application will have been approved on the basis of 'interim planning policies'.

The impact of boating on the River Deben is ignored

Boats, particularly large motor boats, have a powerful disturbing affect on feeding birds, and they are a major cause of erosion of the fragile saltmarsh ecosystem. This problem dramatically affects the sustainability of SP20 and SP21, but is largely ignored. It will not be solved by relegating it to the Area Action Plan.

The sustainability of SP21 has come down dramatically

It is absurd that the score for SP21 (Felixstowe) remains unchanged at 14.5, despite the number of new houses allocated there having increased by 44%, from 1,000 to 1,440.

The risks of over-reliance on mitigation aren't recognised

It is acknowledged that there is uncertainty as to when a country park could be delivered at the Foxhall tip site, but the assertion is still being made that 2,000 houses at Martlesham will have an insignificant impact on the nearby European sites. This entirely dependent on mitigation appearing at the start of house building, and this looks extremely unlikely to happen.

Appropriate Assessment

Conclusions are not based on up-to-date, scientifically valid data

Important conclusions are drawn about visitor numbers and the impact of the proposed housing on the European sites,

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Appropriate Assessment for Core Strategy (August 2011)

O - 4116 - 282 - 5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

4116 Object

5 - Methods of assessing European site visitor increases form an increased human population

and these conclusions are used to justify the LDF Core Strategy’s policies, particularly SP20 and SP21. These are based on one out-of-date visitor survey of the AONB as a whole (and the South Sandlings Survey (2010) which only covers a small number of sites which aren’t the ones most affected).

There is no up to date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites of concern to the Appropriate Assessment. The AONB as a whole and the European Sites within it are regularly confused, with arguments jumping from one to the other without explanation. A proper, scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife. Without this the conclusions about visitor numbers and their impact on European Sites and their wildlife are little more than guesswork.

The estimate of increases in visitor numbers is seriously flawed.

There are many problems with the estimate of increases in visitor numbers:

* It is based on the Suffolk Coast and Heaths AONB survey (2004), which is 7 years out-of-date
* The Suffolk Coast and Heaths AONB survey (2004) cover the whole AONB, not individual sites
* The estimates are based on dubious assumptions, for example, that the relative proportions of day visitors and overnight visitors will not change (§5.3.14) (Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase)
* It is based on the highly implausible assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding.
* The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the new housing proposed in SP20 and SP21 than the average across the AONB.
* The ridiculous claim that people are unlikely to walk further than 1km is still there, despite its flaws having been pointed out on numerous occasions. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben

Information regarding the state of the footpaths around Waldringfield is incorrect

Figure 03, which shows the riverside footpaths north and south of Waldringfield as ‘lost due to erosion’ is misleading. These paths are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

The impact of boating on the River Deben is ignored

No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment. This point has been made many times before and has consistently been ignored.

Unrealistic reliance is placed on mitigation to solve the problems created by SP20 and SP21

Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is totally unrealistic. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

Summary:

Conclusions are not based on up-to-date, scientifically valid data. Important conclusions are drawn about visitor numbers and the impact of the proposed housing on the European sites, and these conclusions are used to justify the LDF Core Strategy’s policies, particularly SP20 and SP21. These are based on one out-of-date visitor survey of the AONB as a whole (and the South Sandlings Survey (2010) which only covers a small number of sites which aren’t the ones most affected).

The estimate of increases in visitor numbers is seriously flawed.

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Object

I continue to object to the allocation of 2000 plus houses on the area next to adastral park as the new documents do not change or address the problems of increased visitor numbers to the Deben estuary, with the figures being quoted based on limited data. There is no evidence of the current number of visitors to the estuary let alone sensible projected figures.

The idea that the number of people in the area being based on 1.57 per household is flawed, coming from the oxford study which you yourselves rejected. Large numbers of people in the area will not move into these new houses and even supposing they did that still leaves houses elsewhere in the area to house new families, all increasing the pressure on local amenities including the Deben estuary, schooling, doctors, dentists and not to mention the road network.

The report talks about a park at foxhall but admits this is unlikely to be available when the houses are built so how can this be used as mitigating the loss of other green area?

I have noticed that recently it has been felt necessary to re mark the roundabout at Main road to emphasise the lanes for each turning. This indicates you are aware of the dangers of this roundabout with the current number of cars using it. Therefore increasing these numbers will make this roundabout more dangerous and encourage drivers to use old main road, through Woodbridge or Felixstowe road as a rat run to avoid the roundabout.

The noise from the A12 in nearby gardens is already high with motorised ignoring the speed limits. This is only going to get worse with more houses in the area.

Therefore I strongly object to the provision of so many houses in one area without true details of the increased visitor numbers and householders and their effect on the local area.

Mrs K Cox
11 carol avenue

Summary:

I continue to object to the allocation of 2000 plus houses on the area next to adastral park as the new documents do not change or address the problems of increased visitor numbers to the Deben estuary, with the figures being quoted based on limited data. There is no evidence of the current number of visitors to the estuary let alone sensible projected figures.

Change to Plan

Not Specified  Not Specified  Not Specified  Not Specified  None

Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I am writing to give my views on the revised Appropriate Assessment, which forms part of the Local Development Framework. I understand that this document is out for public consultation until October 14th 2011.

My comments and complaints are associated with the expected effect on the nearby environmentally sensitive sites, of the proposal to site 2000+ housing units at BT Martlesham.

There are two particular areas of the argument that I cannot accept. The first is that people are unlikely to walk further than 1km to an attractive site such as the Deben. NANT have provided a study, which suggests 3.8km as the average distance walked to this site. Clearly their study is unofficial and therefore not totally reliable, but the study used by the authors of the report is one made in Dorset in 2006 for a completely different type of site and is clearly not appropriate for the Deben.

The second is the calculation of new inhabitants at the level of 1.57 per new dwelling. I understand that this low figure comes from the Oxford Economics Study that SCDC rejected, and that it was based on a suggestion that in Suffolk Coastal around 1/3 of people moving into new housing would be moving out of existing housing in the same area. If this were true, for 2000 dwellings planned for Martlesham, 3140 people would be new to the area, while 1560 would come from the immediate neighbourhood. For the latter not to be swelling the local population, one must assume either that they were all living with their parents, or the dwellings they were living in would be left empty or demolished. Surely this cannot be a true state of affairs.

These two points must make the conclusion that as long as the houses are more than 1km from the Deben SPA unsafe.

The first is that people are unlikely to walk further than 1km to an attractive site such as the Deben. NANT have provided a study, which suggests 3.8km as the average distance walked to this site. Clearly their study is unofficial and therefore not totally reliable, but the study used by the authors of the report is one made in Dorset in 2006 for a completely different type of site and is clearly not appropriate for the Deben.
Appropriate Assessment for Core Strategy (August 2011)

4149  Object

5 - Methods of assessing European site visitor increases

form an increased human population

5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

Respondent: Waldringfield Wildlife Group (Mrs Sally Redfern)  Agent: N/A

Full Text: SUMMARY

Waldringfield Wildlife Group's objections to the revised LDF Core Strategy area:

1. Flawed and inconsistent reasoning
2. Lack of survey of current visitor numbers and their impact on the Deben SPA
3. Failure to consider cumulative impact of development on European sites
4. Contradictory information on mitigation measures
5. A general lack of concern shown towards the environmental issues raised in each of the consultations undertaken so far.

The 41 members of Waldringfield Wildlife Group continue to be deeply concerned with SCDC's LDF/Core Strategy. Following the previous rounds of consultation and the representations from the legal firms instructed by the action group NANT, a few minor changes have been made to the Appropriate Assessment and the Sustainability Appraisal, however these documents remain flawed, with inconsistent reasoning and a stubbornness of purpose which is quite remarkable. Considering that the documents to which these revisions have been made has been 10 years in the making, it is a poor reflection of the council's abilities.

WWG feels that the sum of the impact on protected wildlife areas of the 2000+ houses in the "area east of Ipswich" plus the 1,440 homes near Felixstowe has still not been considered. The whole of the Deben Estuary, including Martlesham Creek, Kirton Creek and Falkenham marshes, are part of the SPA and as such a full survey of existing visitor patterns should be carried out. Current estimates are based on figures from a rather limited survey carried out in 2004 and the anecdotal evidence from the small number of Land Managers consulted (Table 9 5.7.1). The limited survey carried out by NANT volunteers gives an indication of the attraction of a river side setting. Natural England are even recorded in the Revised AA, stating that "any development is likely to bring additional pressures to any of the sites of European interest, however, the area near Martlesham identified as preferred option could have particularly negative impacts on the Deben Estuary SPA/SSSI". NE also expresses similar concern at the proposed development in the areas north of Candlet Road and Felixstowe town, but these comments seem to have been ignored.

Basing predicted patterns of visitor behaviour on a survey of heathland in Dorset is seriously flawed thinking, there are too many variables for scientific validity. Like should be compared with like, similar habitat, similar attractions, similar wider environment. It is nonsense to suggest that as the proposed development site in the "area east of Ipswich" is 1km away from the AONB, people will not walk to the European sites of interest (6.2.45) Natural England's national survey (5.8.9) shows 1.8km as the average distance people will walk from their homes and the NANT survey showed that people walked an average of 3.8km to reach the Deben Estuary. These figures put the European sites well within the range of "the area east of Ipswich".

Mitigation and the much mentioned "Country Park" are put forward as protections for the European sites, but there are contradictions both within the Core Strategy and within common knowledge of SCC financial position. Where is the Country Park to be? Who will pay for its development and maintenance? When will it be available? The original suggestion of the Foxhall tip site (6.5 SP20) seems highly unsuitable, will there be a ban on smoking, barbecues and fireworks because of methane, will any ponds be carefully monitored for tip leachate? Not the "high quality provision" (7.2.9) that people are being led to expect.

It is not only increasing pressure from walkers along the river banks, with or without dogs but an increase in boating activities which will occur if there is a large increase in population. This aspect has been largely disregarded. Canoeists, dinghy sailors and rowers close into the shore disturb feeding birds. The wash from larger motorboats not only disturbs wildlife but is detrimental to the saltmarsh habitat on which so many species rely.

In conclusion, WWG wishes to propose once again that the housing provision needs to be dispersed in small developments, with the inclusion of affordable homes, in villages and towns throughout the SCDC area. This would provide a more sustainable way forward for communities and for the environment.

Summary: The whole of the Deben Estuary, including Martlesham Creek, Kirton Creek and Falkenham marshes, are part of the SPA and as such a full survey of existing visitor patterns should be carried out. Current estimates are based on figures from a rather limited survey carried out in 2004 and the anecdotal evidence from the small number of Land Managers consulted (Table 9 5.7.1). The limited survey carried out by NANT volunteers gives an indication of the attraction of a river side setting.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments: scanned letter

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
4161  

Comment

5 - Methods of assessing European site visitor increases form an increased human population  

5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

Respondent: Veronica Falconer [202]  
Agent: N/A

Full Text:  

With regard to the above consultation, I make the following comments

Sustainability Appraisal

I am sure this will be a valuable document but I am not expert enough to ascertain how correct it is but suggest that before it is submitted eventually to the Planning Inspectorate an independent unbiased person/company are given the opportunity to ensure it is correct. Only having a November 2010 Core Strategy, it is difficult and time consuming to check whether or not the corrections and deletions have been made.

Appropriate Assessment

I believe that had it not been for Mr Buxton's letter on behalf of NANT dated 8th July which highlighted inaccurate information and inconsistencies together with NANTS Visitor Survey which was conducted over 16 days in April and May, and the pertinent comments by Simon Cairns of SPS, the Appropriate Assessment would have been submitted to the Inspector as first published.

This new version - August 2011 - has as a result been modified, updated, increased to 54 pages in 2011 from 34 in 2009 but I feel there are still many flaws to many of the sections where detail is glossed over without enough up to date evidence or fact. The changes are minor and considering it is seven years since it was first drawn up and with all the various input of various bodies and Natural England national visitor survey and NANT’s Visitor Survey earlier this year, I am surprised at how little the revised AA document has changed.

The revised version includes additional paragraphs/sections, changes to various tables and references to areas but these bear little relationship to Suffolk Coastal and the pressure on valuable European protected sites that huge increases in tourists and local dog walkers, bird watchers etc. to these sites, are making.

I suggest too, that instead of quoting Dorset as a study area of heathland, you conduct a study here in Suffolk to see what the residual disturbance of birds caused by local people engaged in low key recreational activities on European sites is; it would make it a more credible document. Afterall, visitor numbers to these areas along the River Deben and River Orwell have increased enormously.

Mitigation for Policy SP2 Housing numbers

In 7.2.10, 7.2.11 and 7.2.15 "A new Country Park or similar" is mentioned. It would be helpful if you could indicate where the Country Park is going to be (one presumes on the Foxhall Tip but this is not confirmed) and also where "similar" high quality provision is going to be in the Ipswich Policy Area. This Peninsula and the surrounds of Ipswich do not have hundreds of spare acres waiting to be turned into “green space”. You mention three Country Parks 7.2.13 throughout the County but they all provide Park/green space areas of 13ha. x2 or158ha. This part of Suffolk does not possess that amount of spare land to offer areas for dog walkers away from heathland sites, capable of offering visitor parking, WCs etc. and as a result is a laughable idea and in not way will be possible especially with the present economic climate where funding is in short supply. I cannot see this provision occurring to form a substantial part of your future mitigation programme to preserve the European sites etc., and all that is so valuable to Suffolk Coastal’s unique habitat in providing much needed greenspace for a huge Housing Development at Adastral Park.

I see no reference to mitigation to the AONB areas bordering the Rivers Deben and Orwell. The impact that 1,440 dwellings close by will impact on the vital habitat and estuaries close to Felixstowe and the Trimleys.

I feel this section on Mitigation is very "woolley" in the revised AA.

I personally have noted in the last twenty five years a huge decline in wild birds. For many years flocks of geese grazed on the fields to the right of my cottage and hundreds of lapwings grazed on the fields to my left. Now neither birds graze. Fieldfares and the lark too have disappeared - the volume of traffic, diesel fumes, increase of buildings, dog walkers, combined with "set aside", which I feel did more damage than good to our natural habitat, has I feel, contributed to the decline and the proposal of 2000 plus dwellings at Adastral Park and 1,440 dwellings down the road at Trimley/Felixstowe four miles away along with all the extra people, cars etc., will totally destroy any bird and wild life, fauna and flora in this area and give a totally urban look to the District. The Mitigation measures suggested will do little to preserve what we at present have, on the AONB, Triple SI and Ramsar sites.

Conclusion

Despite the fact that several "bodies" have brought about a revision of the AA, I am still not convinced that there is any real change backed up by up-to-date current evidence in the August 2011 documents compared with those in September 2009 version.

The integrity of the Deben Estuary will be affected by the proposals for 2000 plus dwellings at Adastral Park and 1440 dwellings further down the road and the proposed mitigation measures mentioned are inadequate and unproven and will result in a serious adverse effect on the Deben Estuary.

Summary:

This new version - August 2011 - has as a result been modified, updated, increased to 54 pages in 2011 from 34 in 2009 but I feel there are still many flaws to many of the sections where detail is glossed over without enough up to date evidence or fact.

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Appropriate Assessment for Core Strategy (August 2011)

4161 Comment

5 - Methods of assessing European site visitor increases

Form an increased human population

5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

Instead of quoting Dorset as a study area of heathland, you conduct a study here in Suffolk to see what the residual disturbance of birds caused by local people engaged in low key recreational activities on European sites is. It would make it a more credible document. After all, visitor numbers to these areas along the River Deben and River Orwell have increased enormously.

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Attachments:
I wish to register my OBJECTION to the Appropriate Assessment (AA) & Sustainability Appraisal (SA) documents (August 2011) which are being used to support SCDC's current LDF draft proposal. The AA & SA are incomplete and inconsistent, with essential mitigation measures (e.g. Country Park near Martlesham) unlikely be implemented in the timescale of the LDF. Furthermore the documents could be viewed as biased and formulated to promote the LDF without giving a balanced viewpoint.

I believe that AA and SA need further work and consequently that the LDF should be passed back to the Full Council for further debate.

Full Response

I wish to register my OBJECTION to the Appropriate Assessment (AA) & Sustainability Appraisal (SA) documents (August 2011) which are being used to support SCDCs current LDF draft proposal. My main concerns are related to the East of Ipswich Plan Area and SP20 and the way SCDC has conducted itself in the development of the LDF.

The reasons for my objection are that the AA & SA documents, and therefore the LDF proposal, are:
1) Incomplete - important mitigation measures (e.g. provision of a Country Park near Martlesham) have not been clearly identified and costed, and by the report's own admission may not be implemented or funded within the timescale of the proposed LDF. As a consequence, such mitigation must be deemed invalid and should be struck from the report.
2) Inconsistent - important data has been acknowledged (e.g. South Sandlings Survey) but ignored in any conclusions, this leaves the reader to form the view that the report is biased and has been formulated in such a way as to promote the proposed LDF.

The LDF proposal and outstanding BT application for Adastral Park (and surrounding land) are inextricably linked. This relationship has been always denied by SCDC since BT's original application in 2008, but Andy Smith (SCDC Planning Portfolio holder) finally admitted it at the public Scrutiny Meeting held on 17th Jan 2011. This statement has never been widely reported or officially minuted only those present at the meeting heard his response which leads one to believe the SCDC is embarrassed by the link.

I therefore believe that all public consultations since and including 2008 have therefore misled the public in SCDC consultation's terms of reference.

The AA or SA refer to the increased traffic load, congestion and pollution but don't take into account the major changes to road infrastructure (ie. A12 at Martlesham) which are planned. Old survey data is used and no account taken of the increased heavy loads using A12 if Sizewell C plans go ahead.

The conversion of 3 roundabouts within half mile of BT Adastral Park entrance to traffic ligh controlled crossroads will cause an increase of toxic pollution to Martlesham residents due to an increase in stationary traffic. These new crossroads will be the ONLY CROSSOARDS ON THE A12 BETWEEN THE M25 AND LOWESTOFT which is an indication of how poorly thought out the new road infrastructure plans have been developed for such an important arterial road.

Traffic lights can fail and therefore halt traffic but roundabouts always allow continuous traffic flow. The use of traffic light controlled junctions is a sign of SCDC's desperation to impose urbanisation on rural and semi-rural villages to accommodate BT. This can be perceived as bias to one local employer.

SCDC make great play of the sustainability aspects of co-siting a single large housing development (2000+ homes) next to BT Adastral Park but the argument for this approach does not hold up to scrutiny for the following reasons:
1) It will not reduce traffic as not everyone living in the new development will work at Adastral Park and with extra visitors will in fact increase the traffic movements in the area.
2) BT has stated that it MAY only develop its site when market conditions are right but it wants the housing development NOW (ie. NO guarantee of jobs but pressure being applied to guarantee an increase in land value/profit for BT) at the expense of environment to the existing communities of Martlesham, Kesgrave, Waldringfield, Kirton, and Brightwell.

I believe that AAS and SA need further work and consequently that the LDF should be passed back to the full Council for further debate.

Summary: Inconsistent - important data has been acknowledged (e.g. South Sandlings Survey) but ignored in any conclusions, this leaves the reader to form the view that the report is biased and has been formulated in such a way as to promote the proposed LDF.
Appropriate Assessment for Core Strategy (August 2011)

4173  Object

5 - Methods of assessing European site visitor increases form an increased human population

5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

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Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I object to the findings in the revised Appropriate Assessment and Sustainability Appraisal dated August 2011. None of the issues raised in my previous consultation responses seem to have been considered and no significant changes have been made.

I am bewildered by the policy which still seeks to concentrate all of the major housing development in the South of the SCDC area and the plans to create the Adastral Park new town, which is completely at odds with all rational thinking.

The Appropriate Assessment still uses out of date data and other recent surveys such as the Deben Visitor Survey and the South Sandlings Survey have been ignored in the conclusions.

The Sustainability Appraisal should have been changed in view of the potential changes to the Core Strategy. This might have allowed for other possibilities for sustainability and in particular consideration could then have been given to a more even distribution of houses throughout the district and on overall housing numbers.

The mitigation measures including a new country park lack any sort of credibility. There is no indication of where this might be located or indeed if there is anywhere suitable in this increasingly congested part of the county.

The Appropriate Assessment still uses out of date data and other recent surveys such as the Deben Visitor Survey and the South Sandlings Survey have been ignored in the conclusions.

### Change to Plan

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**Sound?** | Not Specified  
**Duty to Cooperate?** | Not Specified  
**Soundness Tests** | None  

**Attachments:**

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I object to the findings in the revised AA and SA dated August 2011 on the grounds that the issues identified in my previous consultation responses have not been addressed by revisions in the AA and SA.

There is still use of irrelevant and out of date data, and new data, such as the Deben Visitor and South Sandlings Surveys, although acknowledged, have been largely ignored in the conclusions.

Summary: There is still use of irrelevant and out of date data, and new data, such as the Deben Visitor and South Sandlings Surveys, although acknowledged, have been largely ignored in the conclusions.
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| attachments: |
Object

5 - Methods of assessing European site visitor increases form an increased human population
5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

Respondent: Mr Martin Cottrell [2571]  
Agent: N/A

Full Text:

I object to the findings in the above revised assessments as they do not answer previously notified objections. The Appropriate Assessment still uses out of date and irrelevant data. New information given in the South Sandlings Survey and the Deben Visitor Survey has been noted but then ignored. I understand that a new Country Park has been suggested as a mitigating factor to the high density proposed housing but no site has been identified and no costings are given.

I continue to believe that it is totally unethical for a local planning guideline to exactly match a planning application made by a private company.

On the above matters I believe that the LDF should be returned to he Cabinet for further discussion.

Summary: The Appropriate Assessment still uses out of date and irrelevant data. New information given in the South Sandlings Survey and the Deben Visitor Survey has been noted but then ignored.

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Attachments:
4201 Object
5 - Methods of assessing European site visitor increases
form an increased human population

5.8: Other visitor surveys, comparison of visitor surveys
and calculations of impact

Respondent: Mrs J Whittle [2375] Agent: N/A

Full Text: Once again I am writing to say that I OBJECT most strongly to the proposed development at BT site, Martlesham. The scale of the development is so inappropriate.

I believe that the council's LDF is flawed and concerns expressed in previous consultations have not been addressed by the revisions in the AA and SA. The AA also still gives inappropriate weight to out of date and irrelevant data - new data e.g. South Sandlings Survey & Deben Visitor Survey have been acknowledged but ignored in the conclusions.
Re "suite of mitigation measures", a new Country Park sounds very grand, but no site has been identified or costed, so how can we be sure that years down the line it will ever materialise?
I believe that the spirit of the governments intention to allow planning to be decided at local level is not being followed as the temptations offered by a BT package are greater than the wishes of local residents - who are, lest you forget, your voters!!
The LDF must be returned to the Cabinet for further debate.

Summary: The AA also still gives inappropriate weight to out of date and irrelevant data - new data e.g. South Sandlings Survey & Deben Visitor Survey have been acknowledged but ignored in the conclusions.

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Attachments:

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4214  Object

5 - Methods of assessing European site visitor increases  5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

Respondent:  D A Branch [2603]  
Agent:  N/A

Full Text:  Revised LDF - I OBJECT to the findings on the revised AA and SA dated August 2011

The issues in my previous consultation responses have not been addressed by the revisions in the AA and SA. Also inappropriate weighting has been given in the AA to out of date and irrelevant data. New data, e.g. the South Sandlings Survey and the Deben Visitor Survey, should be considered but these have only been acknowledged then ignored.

An essential piece of the so called "suite of mitigation measures", the new country park, has neither site identified nor costing - so seems unlikely to ever materialise. I strongly suggest that the LDF should be returned to the cabinet for further debate.

Summary:  Also inappropriate weighting has been given in the AA to out of date and irrelevant data. New data, e.g. the South Sandlings Survey and the Deben Visitor Survey, should be considered but these have only been acknowledged then ignored.

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Attachments:
I am responding to the public consultation response (deadline Oct 14th) and the Suffolk Coastal District Council's LDF/Core Strategy.

1 Firstly I should like to say that I am horrified at the squandering of 10 yrs of tax payers money on the production of SCDC strategic document and the errors and time that has been taken up. I have been coming to meetings on the wish of the SCDC to allocate 2000+ houses at BT Martlesham for the last 5 years at least which I am totally against.

2 We have been here for 18 years and there have been some changes in additional housing in the area which is to be expected and helpful as the changes are small ----.----- housing developments are completely different and as families grow, in this area 3 car families will be the norm. Traffic along the road to BT and other ---- will increase considerably and will become unsustainable with regard to the housing policies. Bird life and river life will be swaped.

3 The council so far have used out of date and inappropriate surveys (see NANT and SCDF) and in the revised AA agrees that 2000 houses will increase visitor no's to the Deben SAA.

Summary: The council so far have used out of date and inappropriate surveys (see NANT and SCDF) and in the revised AA agrees that 2000 houses will increase visitor no's to the Deben SAA.
Please find my objections with reference to the above Sustainability Appraisal (SA). They are largely restricted to the area proposed for development in the Martlesham Area East of Ipswich.

In summary, after due consideration of your detailed document I have failed to find your Framework Plan for this area sufficiently plausible & despite the claim on p57 that overall “the latest version of the policy is marginally more sustainable” Notwithstanding the undoubted need for more housing provision in the area, the desperate need for social affordable housing especially, I maintain the Plan's arguments are inadequate on all three of the required Sustainability dimensions. The main reason for this concern, I contend, is the failure to demonstrate in the report that an acceptable, rigorous and proper method and measurement scheme has been deployed before reaching conclusions. My main points to support my view now follow in more detail.

My main points refers to what I see as a crucial weakness throughout this Plan - the weaknesses in the measurement methodology used. Without sound measures, conclusions formed in this appraisal cannot be reliable. In fact, I have found no clear statement of the appraisal methodology used and its limitations. (See Section 3.1 on Method). Look, for example at item 4.4 on p40 “Assumptions and Limitations on information” where it is frankly admitted that there are instances where not supporting data, or only limited data are available to bolster the argument. For a specific illustration of this problem, and again misusing my critique to the Martlesham area proposed for development to the extent of at least 2000 homes, I refer you, as an example, to the lack of any full and clear assessment in the Plan of the likely impact - of what will amount to a suburb of Woodbridge and Ipswich, a new town even - on the surrounding network of country roads, most of them narrow and potentially dangerous to increasing numbers of tourists using them - walkers, cyclists, runners, horse riders. Large farm vehicles use them all the time. Yet to quote the Traffic sub-section in the Plan's heading “Environmental Issues” on p38: “Woodbridge, Felixstowe and several settlements along the coast currently experience congestion especially during the summer”. And: “The dispersed nature of Suffolk’s rural population….could lead to increased demand for private travel” And “It is unreasonable to expect every new resident of the district to use public of sustainable transport all the time” We all know that suburbs have depended on the private car.

I believe these facts conflict with at least one of the “Sustainability Objectives” laid out in table 5.1 on p41, ie “To improve the health of the population overall”. On the contrary, I contend that the development proposed for the area will significantly increase the risks to health and safety of those using the areas, whatever their business, and especially those who are resident here. In table 5.3 on p43 headed “Overall Compatibility of Plan Objectives with SA Objectives” I suggest that there are many conflicting objectives which remain hidden because they are not clearly spelt out, and the prioritising used has not been identified, nor its underpinning values. This may be unintentional. It at least shows a failure of consistency and good reasoning. As far as I am able to judge the method of appraisal has relied heavily on subjective opinion and anecdotes, with assumptions that remain to be strictly tested. I suggest the appraisal has not been sufficiently objective and robust. (See 3.3, p15 on who carried out the SA). The method used is not “fit for purpose”, certainly not for a plan of this scale and magnitude. It is value-laden and insufficiently transparent. Does not central Government's proposed National Planning Policy Framework emphasise the use of an “evidence base”? Facts, and objectivity should trump rhetoric and the subjective, in rational, factual, evidence-based decision-making. Moreover, I have not been able to locate a robust, clear comparison and appraisal, of the full costs and benefits of alternative scenarios such as the dispersal of house building onto smaller sites, a strategy which could benefit local villages, as an alternative to building on a single big site like that of Martlesham East of Ipswich.

The environmental threats to the Deben area posed by the Plan are severe (as its "architects" recognise), with the issue unresolved of the likely full impact on the fragile Deben Estuary and AONB of the proposed Martlesham 2000+ Felixstowe 1440 houses. The mitigation's proposed for environmental protection are wholly inadequate, however. What assurances are there that the mitigation measures proposed will work? There are not data given from a robust survey of current numbers and types of visitors to the area, regardless of the impact of future large increases in visitor numbers resulting from such large scale development. It is also difficult to comment sensibly on the economic aspects of the sustainability issues given the current grave and highly unstable economic situation. For example, will the homes sell in the current climate, the land be paid for, funds be found for the needed infrastructure, country park etc., or will there be unforeseen and unwanted consequences of hasty large-scale over-development? Once done, the damage will not be easily reversed. Further, the rationale for the claims made in the Plan for its social sustainability strike me forcibly as threadbare. Community cohesion for example is a precious commodity, increasingly so these days. But you can't parachute a ready-made community into a new and large suburban estate and spontaneously expect it to be cohesive with an identity and a "sense of place". Such cohesion takes years to grow and it does so with difficulty, requiring constant renewal, as many small town inhabitants and villages will testify. Where does the Plan address these limitations? We are crucially in need of sound balance and clarity of underlying argument. It is wrong to reduce the other sustainability issues involved to the economic based on optimistic but shaky economic predictions about the future. Above all, it should be made clear to us what kind of prioritising has taken place where conflicts of interest occur - as they, perhaps, inevitably, must.

Turning now to my final point, to the unanswered big issues, to the unanswered first questions. The huge number of empty homes/houses in this country, calculated as standing at well over 900,000 by the charity "Empty Homes" is a national scandal. I ask: what is the empty home situation in this district and what is the Council's policy for encouraging their rehabilitation? How many of these properties are there in this district and where are they located? Where are the necessary registers? Surely, we have councillors with the vigour and imagination to match that of Cornwall's and Kent's...
5 - Methods of assessing European site visitor increases

in dealing sensibly with this growing problem, to the benefit of potential occupants and countryside conservation protection? The area in the Plan envisaged for the main development of some 2000+ houses, East of Ipswich is greenfield land. It is estimated that nationally there are 160,000 acres of brownfield land available for development which should cater for 3 million new homes, and that property developers already have planning permission for around 300,000 houses. Encouraging the latter to start to build would be better than moving onto greenfield sites with all the wider “costs” that would entail.

Summary: The environmental threats to the Deben area posed by the Plan are severe (as its “architects” recognise), with the issue unresolved of the likely full impact on the fragile Deben Estuary and AONB of the proposed Martlesham 2000+ and Felixstowe 1440 houses. The mitigation’s proposed for environmental protection are wholly inadequate, however. What assurances are there that the mitigation measures proposed will work? There are not data given from a robust survey of current numbers and types of visitors to the area, regardless of the impact of future large increases in visitor numbers resulting from such large scale development.
I wish to draw your attention to my objection to the findings in the revised AA and SA of August 2011 as I do not believe all the issues have been addressed and the AA is still too dependant on out of date and inappropriate data. New data acquired from the South Sandlings Survey and the Deben Visitor Survey has been ignored and there is nothing to suggest that the mitigation measures in the form of a country park will actually materialise.

In view of the above the LDF should be debated further by the cabinet.

I do not believe all the issues have been addressed and the AA is still too dependant on out of date and inappropriate data. New data acquired from the South Sandlings Survey and the Deben Visitor Survey has been ignored.
I wish to raise my objection to the findings in the revised AA and SA dated August 2011.

Too much out of date and inappropriate data still carries too much weight and new data, i.e. the South Sandlings Survey and the Deben Visitor Survey, although acknowledged, have been ignored in the conclusions. There is no evidence that the proposed country park will in fact materialise as no site has been identified; therefore the LDF should be returned to the cabinet for further discussion and debate.

Summary: Too much out of date and inappropriate data still carries too much weight and new data, i.e. the South Sandlings Survey and the Deben Visitor Survey, although acknowledged, have been ignored in the conclusions.
4239  Object

5 - Methods of assessing European site visitor increases form an increased human population

5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

Respondent: Rosa Waller [499]  Agent: N/A

Full Text: I OBJECT to the findings in the AA and SA as follows:

Appropriate Assessment

1. Assessment of European site visitor increases

OBJECTION

Summary

The data regarding visitor numbers to the Deben SPA is acknowledged to be inadequate - i.e. none exists apart from the Deben Visitor Survey (NANT). Therefore projections regarding the increase in visitor numbers resulting from the proposed housing at Adastral Park are guesswork. As are the resulting projections of potential damage and disturbance to environmentally sensitive sites. It behoves SCDC to conduct proper rigorous studies of visitor numbers to the Deben SPA to create a baseline against which to make realistic assessments.

2. Impact on specific sites

OBJECTION

Summary

It is inappropriate to attempt to predict the impact on the Deben SPA of the inhabitants of 2000 houses at Adastral Park from studies relating to completely different habitats (i.e. Dorset heathland) which are not comparable. The Deben is a tidal estuary, beautiful, remote, wild with many special environmental features and other attractions. NANT’s Visitor Survey showed clearly what a draw the river is and that people with dogs walk/drive a great deal more than 1/8kms suggested here. Proper relevant research needs to be done.

3. Assessment of Policy SP2 Housing numbers

OBJECTION

Summary

The potential for problems and threats to the integrity of the Deben SPA from siting housing at Adastral Park is acknowledged (6.2.28 and 6.2.30) but SCDC continue to assert wrongly (see above) that people will walk/drive only 1/8kms. The need to provide adequate alternative green space is stated without indicating where/what that might be (see below). Contrary to what is stated at 6.2.35 there is now considerable public car parking available in Waldringfield thus increasing the attractiveness of the location. Contrary to what is stated in 6.2.36 the available Riverside route remains attractive for walkers (see below).

4. Mitigation for Policy SP2

OBJECTION

Summary

It is disingenuous to continue to insist that the housing policies will have "no adverse effect" on the integrity of the Deben Estuary SPA (7.4.1). The discredited 1km figure is wheeled our again to justify development at Adastral Park (7.2.6). Provision of alternative green space should "precede or coincide with“ Phase 1 of housing development (7.2.8). Although the idea of a country park is talked up the reality is that no site is available to precede of coincide with phase 1 and anyway SCC no longer funds country parks so it is a matter of pure speculation.

5. Limitations to the Assessment - Further work needed

OBJECTION

Summary

It is scandalous that having admitted that this policy is based on poor and inadequate data SCDC let themselves off the hook by claiming that they don’t need to improve the quality of the data before adopting the Core Strategy and therefore opening the door to the building of 2000 houses at Adastral Park. SCDC need to make policy on the basis of sound and robust data not guesswork and speculation when so much is at stake.

Sustainability Appraisal

1. Appraisal of Core Strategy Policies - Ipswich Policy Area (SP20)

OBJECTION

Summary

It is incorrect to claim that SP20 is "marginally more sustainable" because the policy "seeks to preserve and enhance environmentally sensitive locations” by creating a country park at Foxhall Tip by the end of the plan period. AS stated above alternative green space has to be available at the beginning of the development to act as so-called mitigation in relation to building at Adastral Park.

2. SP20 Ipswich Policy Area

OBJECTION

Summary

It is unacceptable to devolve responsibility for safe-guarding Waldringfield and the Deben Estuary to an Area Acton Plan. Issues like congestion, traffic impacts and the increasing number of boats on the river causing problems to feeding birds and erosion of saltmarsh, the preservation of wildlife and habitat all need to be addressed now otherwise the policy is utterly flawed. The LDF needs to be based on robust policies that have addressed these problems and issues at the outset rather than kicking them into the long grass of an AAP.
4239  
Object

5 - Methods of assessing European site visitor increases form an increased human population

5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

3. Ipswich Policy Area SP20

OBJECTION

Summary

Again the discredited figure of 1km (see above) is used here to suggest that the integrity of the Deben Estuary can be maintained so long as building is more than 1km away from the river. The NANT survey showed that people walk much more than 1 km and therefore 2000 houses at Adastral Park will generate a huge increase in visitor numbers. SCDC are also wrong to suggest that signs saying "no through route" at Waldringfield deter walkers and thereby claim that birds are protected in those areas.

4. Uncertainties and risks (6.9)

OBJECTION

Summary

If additional greenspace is required as mitigation for the 2000 houses at Adastral Park and there is grave uncertainty that it can be delivered at Foxhall Tip (the only potential site mentioned) then this already flawed plan should not go ahead.

The Appropriate Assessment and the Sustainability Appraisal have not addressed the issues of concern that I have raised before.

Summary:

The data regarding visitor numbers to the Deben SPA is acknowledged to be inadequate - i.e. none exists apart from the Deben Visitor Survey (NANT). Therefore projections regarding the increase in visitor numbers resulting from the proposed housing at Adastral Park are guesswork. As are the resulting projections of potential damage and disturbance to environmentally sensitive sites. It behoves SCDC to conduct proper rigorous studies of visitor numbers to the Deben SPA to create a baseline against which to make realistic assessments.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Appropriate Assessment for Core Strategy (August 2011)

4240 Object
5 - Methods of assessing European site visitor increases form an increased human population
5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

Respondent: Rosa Waller [499]  Agent: N/A

Full Text:
I OBJECT to the findings in the AA and SA as follows:

Appropriate Assessment
1. Assessment of European site visitor increases
OBJECTION
Summary
The data regarding visitor numbers to the Deben SPA is acknowledged to be inadequate - i.e. none exists apart from the Deben Visitor Survey (NANT). Therefore projections regarding the increase in visitor numbers resulting from the proposed housing at Adastral Park are guesswork. As are the resulting projections of potential damage and disturbance to environmentally sensitive sites. It behoves SCDC to conduct proper rigorous studies of visitor numbers to the Deben SPA to create a baseline against which to make realistic assessments.

2. Impact on specific sites
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Summary
It is inappropriate to attempt to predict the impact on the Deben SPA of the inhabitants of 2000 houses at Adastral Park from studies relating to completely different habitats (i.e. Dorset heathland) which are not comparable. The Deben is a tidal estuary, beautiful, remote, wild with many special environmental features and other attractions. NANT's Visitor Survey showed clearly what a draw the river is and that people with dogs walk/drive a great deal more than 1/8kms suggested here. Proper relevant research needs to be done.

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The potential for problems and threats to the integrity of the Deben SPA from siting housing at Adastral Park is acknowledged (6.2.28 and 6.2.30) but SCDC continue to assert wrongly (see above) that people will walk/drive only 1/8kms. The need to provide adequate alternative green space is stated without indicating where/what that might be (see below). Contrary to what is stated at 6.2.35 there is now considerable public car parking available in Waldringfield thus increasing the attractiveness of the location. Contrary to what is stated in 6.2.36 the available riverside route remains attractive for walkers (see below).

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5. Limitations to the Assessment - Further work needed
OBJECTION
Summary
It is scandalous that having admitted that this policy is based on poor and inadequate data SCDC let themselves off the hook by claiming that they don't need to improve the quality of the data before adopting the Core Strategy and therefore opening the door to the building of 2000 houses at Adastral Park. SCDC need to make policy on the basis of sound and robust data not guesswork and speculation when so much is at stake.

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1. Appraisal of Core Strategy Policies - Ipswich Policy Area (SP20)
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Summary
It is incorrect to claim that SP20 is "marginally more sustainable" because the policy "seeks to preserve and enhance environmentally sensitive locations" by creating a country park at Foxhall Tip by the end of the plan period. AS stated above alternative green space has to be available at the beginning of the development to act as so-called mitigation in relation to building at Adastral Park.

2. SP20 Ipswich Policy Area
OBJECTION
Summary
It is unacceptable to devolve responsibility for safe-guarding Waldringfield and the Deben Estuary to an Area Acton Plan. Issues like congestion, traffic impacts and the increasing number of boats on the river causing problems to feeding birds and erosion of saltmarsh, the preservation of wildlife and habitat all need to be addressed now otherwise the policy is utterly flawed. The LDF needs to be based on robust policies that have addressed these problems and issues at the outset rather than kicking them into the long grass of an AAP.

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Appropriate Assessment for Core Strategy (August 2011)

Object

5 - Methods of assessing European site visitor increases and calculations of impact

3. Ipswich Policy Area SP20

Summary

Again the discredited figure of 1km (see above) is used here to suggest that the integrity of the Deben Estuary can be maintained so long as building is more than 1km away from the river. The NANT survey showed that people walk much more than 1 km and therefore 2000 houses at Adastral Park will generate a huge increase in visitor numbers. SCDC are also wrong to suggest that signs saying "no through route" at Waldringfield deter walkers and thereby claim that birds are protected in those areas.

4. Uncertainties and risks (6.9)

Summary

If additional greenspace is required as mitigation for the 2000 houses at Adastral Park and there is grave uncertainty that it can be delivered at Foxhall Tip (the only potential site mentioned) then this already flawed plan should not go ahead.

The Appropriate Assessment and the Sustainability Appraisal have not addressed the issues of concern that I have raised before.

Summary:

It is inappropriate to attempt to predict the impact on the Deben SPA of the inhabitants of 2000 houses at Adastral Park from studies relating to completely different habitats (i.e. Dorset heathland) which are not comparable. The Deben is a tidal estuary, beautiful, remote, wild with many special environmental features and other attractions. NANT’s Visitor Survey showed clearly what a draw the river is and that people with dogs walk/drive a great deal more than 1/8kms suggested here. Proper relevant research needs to be done.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Having identified a number of issues in my previous consultation responses, I do not believe these have been sufficiently addressed by the revisions in the AA and SA. Additionally it seems to me that an inappropriate weighting has been given in the AA to out of date and irrelevant data. New data should be considered, e.g. the South Sandlings Survey and the Deben Visitor Survey, whose conclusions have been acknowledged but then disregarded. The new country park, which is an essential piece of the so called "suite of mitigation measures", has neither had its site identified nor been costed - I can only conclude that this seems extremely unlikely ever to materialise. Therefore considering these revisions, I strongly suggest that the LDF should be returned to the cabinet for further debate.

Additionally it seems to me that an inappropriate weighting has been given in the AA to out of date and irrelevant data. New data should be considered, e.g. the South Sandlings Survey and the Deben Visitor Survey, whose conclusions have been acknowledged but then disregarded.

**Summary:**

Having identified a number of issues in my previous consultation responses, I do not believe these have been sufficiently addressed by the revisions in the AA and SA. Additionally it seems to me that an inappropriate weighting has been given in the AA to out of date and irrelevant data. New data should be considered, e.g. the South Sandlings Survey and the Deben Visitor Survey, whose conclusions have been acknowledged but then disregarded.
Appropriate Assessment for Core Strategy (August 2011)

4271 Object
5 - Methods of assessing European site visitor increases to form an increased human population
5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

Respondent: Waldringfield Church Field Trust (Christine Fisher Kay) [420]
Agent: N/A

Full Text: Re: Appropriate Assessment and Sustainability Appraisal (August 2011)

As trustees of Waldringfield Church Field Trust we are again writing to object to these proposals. We do not consider the changes to the document make it any way more acceptable than it was previously. The Trust manages one of two public open spaces in the village of Waldringfield.

OBJECTIONS

Summary

Re: area south and east of Adastral Park: 2000 houses

We consider that the car park at Church Field although meant for users of the field may be used as a starting point for increased use of footpaths along the Deben Estuary leading to significant disturbance of the flocks of birds feeding and roosting there. We continue to have problems with dogs not on leads (in spite of notices) and owners not using the dog waste bins. These problems are likely to be much worse if Waldringfield becomes part of the urban fringe.

Mitigation proposals

Whereas both the revised and original documents attempt to maintain that mitigation can solve problems of disturbance to wildlife on the Deben estuary, a number of things are missing:

* No actual study of the area in question, aimed at assessing effects of the proposals - only a desk based exercise referring to inadequate and largely non relevant data.
* No knowledge of current visitor numbers to either the Deben Estuary or the SPA as a starting point for predictions.
* A continued assumption that the development is too far away at 1km from the SPA to have a significant effect, based on a study of a completely different type of area in Dorset. We increasingly notice use of our small car park by people walking down to the river, perhaps to avoid the £1 car parking fee which applies until 6 p.m. in the public car park behind the pub. It is easy to predict parking on road verges all along Mill Road (a single track road) on a nice weekend in Summer if 2000 houses are located a 5 minute drive away.
* References to wardening as solving the problems. The Deben SPA would be impossible to ‘police’ effectively consisting as it does of tidal mudflats, saltmarsh and winding muddy footpaths. It cannot be fenced either. Dog walkers as we have found take little notice of signs and often refuse to believe their dogs cause a problem of disturbance.
* No reference is made to the potential problems of disturbance and erosion caused by the increased use of powered or other craft on the river which is inevitable.

As before, we consider that the alternative of smaller developments throughout the region in response to local demand and including affordable housing, integrated into existing communities, would be the more logical and desirable.

Summary:

Whereas both the revised and original documents attempt to maintain that mitigation can solve problems of disturbance to wildlife on the Deben estuary, a number of things are missing:

* No actual study of the area in question. only inadequate and largely non relevant data.
* No knowledge of current visitor numbers
* A continued assumption that the development is too far away at 1km from the SPA to have a significant effect.
* References to wardening as solving the problems. The Deben SPA would be impossible to ‘police’.
* No reference is made to the potential problems of disturbance and erosion caused by the increased use of powered or other craft on the river which is inevitable.

Change to Plan

Appear at exam? Not Specified
Legal? Not Specified
Sound? Not Specified
Duty to Cooperate? Not Specified
Soundness Tests None

Attachments: scanned letter

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Simply, we wish to complain that the online response system is not sufficiently accessible for members of the general public. Being asked to submit responses within specific sections of two very long documents only works if stakeholders want to make specific comments at these particular points. This system discourages general comments. Splitting the document into sections also means that it is impossible to search comprehensively. In fact, the process is so complicated and time consuming it could discourage stakeholders from making any comments at all.

Also we wish to complain that the website shows 2 conflicting times for the end of the consultation - on one page it states 4.45 pm and on another it states 04.45. This has been brought to the attention of the Chief Executive of SCDC.

Consultation response

NANT OBJECTS to the findings in the revised AA and SA dated August 2011.

The issues identified in our previous consultation responses of January 2011 and subsequent letters to the council have not been addressed by the revisions in the AA and SA.

The latest version of the Appropriate Assessment demonstrates a lack of rigour when presenting "evidence" for assessing environmental risk, some examples

- it concedes that no data is available on visitor numbers to the nearby Deben Estuary and yet still goes on to draw unfounded conclusions regarding the impact on the area of 2000 houses at Martlesham. New data such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then to a great extent, ignored in the conclusions.
- although it now acknowledges that there is public car parking Waldringfield it describes this as limited. No car park in the world has an infinite number of parking spaces so that statement is literally correct. However, the car park rarely reaches capacity and is capable of accommodating a significant increase in numbers of visitors.
- using this incorrect data it draws the erroneous conclusion that visitors would therefore not be able to arrive by car and would have to arrive on foot.
- it further concludes that this means that as long as the houses are more than 1km from the river, the new residents will not visit the river, therefore there will be no impact on the Internationally Protected Deben Estuary.
- it relies on an out of date 2006 study from Dorset to make the 1 km assumption even though later studies produced in 2008 and 2009 draw quite different conclusions as does the South Sandlings Survey.
- it states that there are breaches in the sea wall and therefore people can not go for circular walks and disturb the over wintering birds and other wildlife. Yes there are breaches, but at greater distances from Waldringfield than stated in the AA. In fact these are precisely at the area best known for over-wintering birds. The Deben Estuary Survey shows that many people use Waldringfield as the starting point for riverside walks.
- some of the proposed mitigation relies on the as yet undefined green space to the north of Ipswich, and/or the conversion of the Foxhall tip to a country park, which elsewhere is highlighted as being undeliverable during the lifetime of the LDF.
- the AA concludes that because of the limited information on visitor numbers, and therefore the inability to assess the impact of the 2000 houses at Martlesham, a full visitor survey should be commissioned by others in order to determine appropriate mitigation. That makes sense - it then states that this is not necessary for the core strategy. This might apply if the LDF was a true "strategic" document. However, the authors of this Core Strategy have decided to include detailed site-specific housing allocations within the LDF, it is therefore essential, logical and fair that site-specific, deliverable mitigation is correctly determined before progressing any further.

On the basis of the significant anomalies and inaccurate information within the AA and the SA the LDF should be returned to the cabinet for further debate.

Janet Elliot
Mill Cottage
Mill Road
Waldringfield
IP12 4PY

On behalf of the 4000+ supporters of NANT

Summary:

- it concedes that no data is available on visitor numbers to the nearby Deben Estuary and yet still goes on to draw unfounded conclusions regarding the impact on the area of 2000 houses at Martlesham. New data such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then to a great extent, ignored in the conclusions.
4323  Object

5 - Methods of assessing European site visitor increases  5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

Change to Plan

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On behalf of the 4000+ supporters of NANT

Summary:
- It relies on an out of date 2006 study from Dorset to make the 1 km assumption even though later studies produced in 2008 and 2009 draw quite different conclusions as does the South Sandlings Survey.

Change to Plan

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### Appropriate Assessment for Core Strategy (August 2011)

<table>
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<tr>
<th>Object</th>
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<tr>
<td>4326</td>
<td>5 - Methods of assessing European site visitor increases and calculations of impact</td>
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#### 5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

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#### Attachments:
- full text

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Appropriate Assessment for Core Strategy (August 2011)

4354 Comment

5 - Methods of assessing European site visitor increases form an increased human population
5.8: Other visitor surveys, comparison of visitor surveys and calculations of impact

Respondent: RSPB (Dr Philip Pearson) [580]  Agent: N/A

Full Text: SUFFOLK COASTAL LOCAL DEVELOPMENT FRAMEWORK - CONSULTATION ON THE UPDATED SUSTAINABILITY APPRAISAL AND APPROPRIATE ASSESSMENT FOR THE REVIEWED CORE STRATEGY

The RSPB is pleased to be able to comment on the updated Sustainability Appraisal (SA) and Appropriate Assessment (AA) for the reviewed Core Strategy. Our detailed comments are provided in Appendix 1.

In our response to the Revised Core Strategy and associated documents dated 21st January 2011, the RSPB highlighted the fact that the Core Strategy provides an insufficient steer on the protection and enhancement of biodiversity (including habitat creation). No changes to the previous submission draft of the Core Strategy appear to have been made to address this issue. Our previous comments on the document therefore remain largely applicable, although we have made some amendments in light of the additional information provided in the updated AA.

1. Use of appropriate baseline information to assess impacts of new development on south Suffolk Natura 2000 sites. The RSPB is pleased that the South Sandlings visitor survey report1 has been used to improve the baseline information supporting the conclusions in the updated AA. As we stated in our response to the preferred options stage (dated 18th November 2009), it is vital that any increase in the district's population must be carefully screened and monitored to ensure that there is not an adverse effect from increased visitor pressure to Natura 2000 sites. We therefore accept that a sufficient baseline understanding of visitors to sites such Rendlesham forest and Sutton Heath is available and that appropriate mitigation measures will be implemented where and when necessary. However, the RSPB remains concerned about the baseline information available to assess impacts to the areas estuaries, notably the Deben Estuary Special Protection Area (SPA) and Stour and Orwell Estuaries SPA. Whilst we are pleased that, particularly for the Deben Estuary SPA, it is noted that even relatively small increases in visitor numbers should not be treated as trivial there still remains the issue of a paucity of visitor data. We recognise that the 'No Adastral New Town' action group have carried out some visitor surveys on the Deben Estuary that broadly reflect the behaviour of the South Sandlings surveys. However, we expect the council to commit to work to ensure a suitable, up to date baseline for all the estuaries2 is in place prior to development taking place within the Martlesham area; something we have urged the council to do since responded to the Site Specific Allocations and Policies Issues and Options Consultation in February 2009.

2. The use of monitoring for assessing impacts on Natura 2000 sites. The Council (in-combination with Ipswich Borough Council) must be able to show that development proposed for the Martlesham and Felixstowe areas will not adversely affect Natura 2000 sites: the Deben Estuary SPA and the Stour and Orwell Estuaries SPA, as well as the Sandlings SPA. Without an up to date baseline of current visitor numbers and their distribution it is not possible to assess the likely effects of future changes and conclude that the proposed Plan will have no adverse effects on Natura 2000 sites arising from recreational disturbance. Monitoring of effects after development, whilst important, cannot be considered as mitigation and used to conclude that there will not be an adverse effect on international sites, as it merely reports effects rather than preventing them.

3. Comments on the Appropriate Assessment conclusions and mitigation proposals. We generally accept the findings of the AA and the proposed mitigation measures that will be necessary to avoid adverse effects on Natura 2000 sites in the future. We are particularly supportive of the need for the provision of greenspace to encourage visitor pressure away from Natura 2000 sites. The effectiveness of this greenspace, particularly a new country park, would need to be carefully monitored and a management strategy prepared for individual sites, or for a collection of smaller sites. We would expect the greenspace to be functioning fully prior to development taking place.

4. Conclusions on the soundness of the reviewed Core Strategy. Whilst the RSPB accepts the general conclusions of the updated Appropriate Assessment, the RSPB considers that the Core Strategy remains unsound. Our comments provided in Appendix 1 reflect the inadequate consideration of biodiversity throughout the document and the need to highlight the importance of Natura 2000 sites within the district. Whilst the RSPB recognises that national guidance (for example, paragraph 5.2 of PPS123) clearly indicates that the Core Strategy should not repeat national legislation, in some circumstances it may be appropriate to provide greater clarity within a few policies by outlining policy approaches in line with legislative procedures, or reference to key policies. The RSPB therefore recommends some minor amendments to various policies (for example, Policies SP8 and SP14) that would benefit from greater reference to the Habitats Regulations.

5. RSPB involvement with the oral examination

The RSPB wishes to attend the oral examination of the evidence-base of the Core Strategy and Development Management Policies DPD, as well as the session covering Policies SP2 (Housing Numbers) and SP14 (Biodiversity). If you have any queries on the issues discussed above, please do not hesitate to contact me. We would be happy to meet to discuss our comments in order to resolve our outstanding concerns in advance of the formal examination of the DPD.

Yours faithfully,
Philip Pearson (Dr)
Conservation Officer

RSPB Eastern England Regional Office
Annex to the RSPB response to Suffolk Coastal District Council's Reviewed Core Strategy
Appendix 1: RSPB comments on the Core Strategy and Sustainability Appraisal
Section 1.20 (p. 18)

The Habitats Regulations Assessment (HRA) recognises that there is a paucity of data to fully assess impacts to key Natura 2000 sites, such as the Deben Estuary SPA, but still concludes that there will not be a likely significant effect.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
from the scale of development near these sites. This is based on the assumption that people will only walk 1km or less and drive 8km or less on a regular basis. In our response to the Preferred Options document we questioned this assumption and we note that the council has not provided any evidence to support these assumptions. We consider that development at greater distances has the potential to significantly impact these sites as well.

Section 2.27 (p. 26)
The RSPB is pleased that the potential adverse effect of increased visitor pressure on the environment has been recognised. This issue could have a significant effect on Natura 2000 in the vicinity of key development areas (Martlesham and Felixstowe) and needs to be address appropriately throughout the Core Strategy and not just this one section.

Environmental Profile (pp. 29-31)
The RSPB is supportive of the Environmental Profile (EP). However, it does not consider the need for habitat creation. For example, it highlights that coastal freshwater habitats within the district will experience increased pressure from rising sea levels and coastal squeeze. These habitats support many rare species that have very limited distributions within the UK. Re-creation of freshwater habitats in more sustainable locations away from the coast is critical if species reliant on freshwater habitats are to be protected.

Strategic Policy SP1 (Sustainable Development, p. 37)
The RSPB is supportive of this policy, especially aims to (a) mitigate against and adapt to the effects of climate change, (c) achieve a local balance between employment opportunities, housing growth and environmental capacity, and (e) give priority to re-using previously developed land and buildings. Aim (j) (to conserve and enhance the best of the areas natural and built environment) should also include habitat creation.

Strategic Policy SP5 (Employment Land, p. 50)
The creation of an additional 30,000 new jobs close to Natura 2000 sites has the potential to increase visitor pressure to such sites. Careful assessment of these areas is required.

Strategic Policy SP8 (Tourism, p. 53)
The current wording of the policy fails to identify the Natura 2000 sites (notably the Deben Estuary SPA, Sandlings SPA, and Stour and Orwell Estuaries SPA) that could be impacted by increased tourism at many of the proposed development areas. These sites contain species and habitats that are highly vulnerable to disturbance from visitors, boats and other vehicles that increase noise levels and trampling. SPAs, SACs and SSSIs should be highlighted as features of importance alongside, for example, the AONB and Heritage Coast.

Section 3.133 (p. 65)
For Natura 2000 sites, it is important that the wording makes it clear that development must avoid an adverse effect in the first instance and the presumption should be that damaging development will not be permitted. Where mitigation may be acceptable, it is important that it is secured and functioning prior to development.

Strategic Policy SP14 (Biodiversity and Geodiversity, p. 67)
For Natura 2000 sites, it is important that the wording makes it clear that development must avoid an adverse effect in the first instance and the presumption should be that damaging development will not be permitted. New development has the potential to reverse the declines of urban bird species such as swift, house sparrow and starling. A range of nest boxes are available that can be included in the construction of new buildings (residential and employment)

5. Development should also incorporate areas of nectar-rich plants to maintain healthy insect populations and plants that will provide seed during the winter. By providing such areas it will ensure there is a sufficient year-round food resource for birds that colonise the development. Good design principles to incorporate biodiversity into new development are contained within the Town and Country Planners Association's Ecotowns Biodiversity Worksheet 6 and Appendix 6 of the UK Green Building Council's (UK GBC) biodiversity guidance (p. 15)7. Table 1 was tailored for the Rackheath Ecotown development in Norfolk, but is based on the UK GBC guidance and would be suitable to be customised for development in the district:

<table>
<thead>
<tr>
<th>Biodiversity</th>
<th>Swifts 5-10 swift bricks per dwelling</th>
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<tr>
<td>House martins</td>
<td>2-3 artificial nests on 1 in 50 buildings</td>
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<tr>
<td>House sparrows</td>
<td>2-3 boxes/bricks on 1 in 40 buildings</td>
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<tr>
<td>Starlings</td>
<td>1 box in 100 buildings</td>
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Sections 4.14 - 4.17 (pp. 85-86)

This section highlights the proposed development of 2000 new homes at Adastral Park. The RSPB has already commented on the planning application for this development and remains opposed to the development due to the failure to provide sufficient mitigation to avoid adverse effects to the Deben Estuary SPA through increased recreational disturbance. We are concerned that the planning application for this development is more advanced than the strategic guidance that would govern sustainable development in the area.

It is important that the international importance of the Deben Estuary is identified. It is designated as a SPA for its wintering avocet population.

Strategic Policy SP20 (Eastern Ipswich Plan Area, pp. 88-89)
See comments on Sections 4.14 - 4.17 above.

Strategic Policy SP21 (Felixstowe, pp. 93-94)
Development within this area could result in a likely significant effect on Trimley Marshes and the Stour and Orwell Estuaries SPA. If development in this location is to be acceptable it must be clearly shown that any potential adverse effects can be avoided. Sufficient information needs to be provided at the Core Strategy stage to justify the allocation at

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5 - Methods of assessing European site visitor increases

from an increased human population

Strategic Policies SP22 (Aldeburgh, pp. 96-97), SP24 (Leiston, pp. 98-99), SP26 (Woodbridge, pp. 101-102)

Development at these specific locations could result in increased recreational disturbance to adjacent SPAs (Alde-Ore Estuary SPA, Sandlings SPA and Deben Estuary SPA). Any development must be carefully assessed to consider the likely impact of new development close to such sites to ensure that they are not adversely affected.

Development Management Policy DM17 (Touring Caravan, Camper Vans and Camping Sites, p. 125)

The RSPB is pleased that extensions to such sites will only be permitted if they will not have an adverse effect on protected sites and wildlife. Bullet Point (i), however, includes the phrase "materially adverse impact". We do not consider this to be in line with the Habitats Regulations terminology and recommend this be amended to "adverse impact" only.

Development Management Policy DM27 (Biodiversity and Geodiversity, p. 133)

The RSPB supports the presumption that damaging development will not be permitted. It is uncertain what is meant by the phrase "unacceptable impact". We recommend this phrase be replaced with "adverse effect" which has a specific meaning under the Habitats Regulations.

Table 6.1 (Monitoring Framework, pp. 149-150)

An additional indicator included for Objective 11 (Protecting and Enhancing the Physical Environment) should be contributions of new development to BAP targets. These should monitor the amount of habitat created and improvement of the status of key species in the district. Using the BAP targets, especially local targets, this would provide an indication of whether the Council was meeting its statutory obligations set out in the NERC Act 2006.

RSPB comments on the Sustainability Appraisal

Table 4.3 (Key social, environmental and economic issues in Suffolk Coastal, p.38)

In the 'Biodiversity' section Natura 2000 sites are not mentioned. Suffolk Coastal supports five Special Protection Areas that are internationally important for the bird populations they support. These should therefore be referenced, as well as the number of Special Areas of Conservation.

Summary:

The RSPB is pleased that the South Sandlings visitor survey report has been used to improve the baseline information supporting the conclusions in the updated AA.

The RSPB remains concerned about the baseline information available to assess impacts to the areas estuaries. We are pleased that, particularly for the Deben Estuary SPA, it is noted that even relatively small increases in visitor numbers should not be treated as trivial there still remains the issue of a paucity of visitor data.

We expect the council to commit to work to ensure a suitable, up to date baseline for all the estuaries is in place prior to development

Change to Plan

Appearance at Exam?

Not Specified

Legal?

Not Specified

Sound?

Not Specified

Duty to Cooperate?

Not Specified

Soundness Tests

None

Attachments:

letter
SUFFOLK COASTAL LOCAL DEVELOPMENT FRAMEWORK - CONSULTATION ON THE UPDATED
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Philip Pearson (Dr)
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Section 3.152 (p. 69) & Development Management Policy DM21 (Design: aesthetics, pp. 128-129)

New development has the potential to reverse the declines of urban bird species such as swift, house sparrow and starling. A range of nest boxes are available that can be included in the construction of new buildings (residential and employment)

5. Development should also incorporate areas of nectar-rich plants to maintain healthy insect populations and plants that will provide seed during the winter. By providing such areas it will ensure there is a sufficient year-round food resource for birds that colonise the development. Good design principles to incorporate biodiversity into new development are contained within the Town and Country Planners Association's Ecotowns Biodiversity Worksheet 6 and Appendix 6 of the UK Green Building Council's (UK GBC) biodiversity guidance (p. 15). Table 1 was tailored for the Raekheath Ecotown development in Norfolk, but is based on the UK GBG guidance and would be suitable to be customised for development in the district:

Table 1: Providing nesting and roosting opportunities in new buildings 8 Species Standards Crevice dwelling bats 1 box in 20 structures Bats requiring flight space Access provided in five public buildings (non-residential) Swifts 5-10 swift bricks per dwelling House martins 2-3 artificial nests on 1 in 50 buildings House sparrows 2-3 boxes/bricks on 1 in 40 buildings Starlings 1 box in 100 buildings

Sections 4.14 - 4.17 (pp. 85-86)

This section highlights the proposed development of 2000 new homes at Adastral Park. The RSPB has already commented on the planning application for this development and remains opposed to the development due to the failure to provide sufficient mitigation to avoid adverse effects to the Deben Estuary SPA through increased recreational disturbance. We are concerned that the planning application for this development is more advanced than the strategic guidance that would govern sustainable development in the area. It is important that the international importance of the Deben Estuary is identified. It is designated as a SPA for its wintering avocet population.

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Summary: The use of monitoring for assessing impacts on Natura 2000 sites. The Council (in-combination with Ipswich Borough Council) must be able to show that development proposed for the Martlesham and Felixstowe areas will not adversely affect Natura 2000 sites: the Deben Estuary SPA and the Stour and Orwell Estuaries SPA, as well as the Sandlings SPA. Without an up to date baseline of current visitor numbers and their distribution it is not possible to assess the likely effects of future changes and conclude that the proposed Plan will have no adverse effects on Natura 2000 sites arising from recreational disturbance.

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Attachments: letter

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I object to the findings of the August 2011 Appropriate Assessment and Sustainability Appraisal.

The Appropriate Assessment give inappropriate weight to out of date and irrelevant data. While the South Sandlings Survey and the Deben Visitor Survey have been acknowledged, their findings have not been taken into account in the conclusion.

A new country park is an essential piece of the mitigation measures, but no site has been identified or costed. This needs to be included as part of the plan otherwise.

The issues identified in my previous consultation responses have not been addressed by the revisions in the Appropriate Assessment and Sustainability Appraisal.

In particular, the Sustainability Appraisal continues to make reference to the "strategic employment site that is also considered for expansion". This is a fallacy that I have pointed out on numerous occasions in previous consultations. BT does not need the site at Martlesham any more. Employment has declined because technology means that many of the jobs are not needed. This is not because there was insufficient housing locally. BT continue to over count the number of employment opportunities on the site as part of a way of trying to add evidence for their case. This is by tricks such as saying that their employees are based at Adastral park in their contract, when actually they work out of another site most of the time. There should be a legal obligation for employment numbers before a certain tranche of houses are built. I am an employee of a small company at Innovation Martlesham. We chose the offices because we got a deal on cheap rent, not because of the touted benefits of co-location which haven't actually materialised. Perhaps it would be better to talk to people (like me) who actually do innovation, rather than those senior managers who talk about innovation. It is astonishing that a commercial organisation is able to profit in this way while failing to run their own business properly.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Summary: The Appropriate Assessment give inappropriate weight to out of date and irrelevant data. While the South Sandlings Survey and the Deben Visitor Survey have been acknowledged, their findings have not been taken into account in the conclusion.

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Attachments:
I am writing to you because I OBJECT to the findings listed in the revised AA and SA of August 2011.

You have still to address issues raised in my earlier responses to your consultations and which are not addressed by the revisions in the AA and SA.

The AA still gives inappropriate weight to out of date and inappropriate data.

New data, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions.

An essential piece of the so called "suite of mitigation measures" is a new country park. No site has been identified or costed - there is no evidence that this will materialise.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Summary:

New data, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions.
Consultation Response

I have objected on two previous occasions to the LDF and the further revisions offered in the current consultation (Area Assessment and Sustainability Appraisal) go nowhere to addressing my previous concerns, ie my previous objections remain in place.

The current LDF proposals will not achieve the demographic balance required to keep the rural and coastal areas sustainable. Furthermore the proposals continue to provide a strategic roadblock to the overall access to the area by overloading the Orwell Bridge and effectively destroying a national economic infrastructure capability to the port of Felixstowe, tourism, and the business that rely on free movement of traffic in the area.

The council has not taken due account of additional information such as the South Sandling Survey and the Deben Visitor Survey in preparing the Area Assessment and has instead given undue emphasis to out of date and inappropriate data.

The suite of mitigation measures offered is not credible. Key objections to the LDF should not be evaded by introducing the concept of a new country park. Given that no site or costing have been identified this mythical device should not be given any credibility as a mitigation measure for such a sensitive area.

The revisions offered in the consultation should not be accepted and therefore returned to Cabinet for reconsideration.

END

Summary: The council has not taken due account of additional information such as the South Sandling Survey and the Deben Visitor Survey in preparing the Area Assessment and has instead given undue emphasis to out of date and inappropriate data.

Change to Plan

No examination

Legal? Not Specified
Sound? Not Specified
Duty to Cooperate? Not Specified
Soundness Tests None

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
4071 Object

I object to the findings in the revised AA and SA dated August 2011. I have written previously several times stating my objections. These have still not been addressed by the revisions in the AA and SA. The so-called provision of a country park in no way mitigates against the wholesale destruction of a large area of countryside, and the subsuming of a small riverside village into a suburb.

I therefore request that the LDF should be debated further, taking into consideration new data which has been supplied e.g. the South Sandlings Survey and the Deben Visitor Survey.

Summary: Request that the LDF should be debated further, taking into consideration new data which has been supplied e.g. the South Sandlings Survey and the Deben Visitor Survey.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Object
5 - Methods of assessing European site visitor increases to form an increased human population
Deben Estuary Visitor Survey Report, July 2011 (5.8.3 - 5.8.8)

Respondent: Mr James Barclay [2495]  
Agent: N/A

Full Text: The NANT survey produced some useful data but "does not have the data or analysis to predict changes to visitor numbers". I strongly suggest that a thorough survey is commissioned along the lines of the Sandlings that will produce fuller and more useful information.

Summary: The NANT survey produced some useful data but "does not have the data or analysis to predict changes to visitor numbers". I strongly suggest that a thorough survey is commissioned along the lines of the Sandlings that will produce fuller and more useful information.

Change to Plan

Appear at exam? Not Specified  
Legal? Not Specified  
Sound? Not Specified  
Duty to Cooperate? Not Specified  
Soundness Tests None

Attachments:
My name is Mariah Skellorn and I OBJECT to the findings in the revised AA and SA dated August 2011.

The issues identified in my previous consultation responses have not been addressed by the revisions in the AA and SA.

-The AA still uses out of date and irrelevant data.

-New data, i.e. the South Sandlings Survey and the Deben Visitor Survey have been acknowledged and then thoroughly ignored in the conclusions.

-The so called "suite of mitigation measures" includes a new country park. No site has been identified or costed for this and there is no evidence that this will materialise.

-On the basis of these revisions the LDF should be returned to the cabinet for further debate.

New data, i.e. the South Sandlings Survey and the Deben Visitor Survey have been acknowledged and then thoroughly ignored in the conclusions.
4151  Object

5 - Methods of assessing European site visitor increases  Natural England Visitor Survey (5.8.9 - 5.8.10) form an increased human population

Respondent:  Waldringfield Wildlife Group (Mrs Sally Redfern)  Agent:  N/A

Full Text:

SUMMARY

Waldringfield Wildlife Group’s objections to the revised LDF Core Strategy area:

1. Flawed and inconsistent reasoning
2. Lack of survey of current visitor numbers and their impact on the Deben SPA
3. Failure to consider cumulative impact of development on European sites
4. Contradictory information on mitigation measures
5. A general lack of concern shown towards the environmental issues raised in each of the consultations undertaken so far.

The 41 members of Waldringfield Wildlife Group continue to be deeply concerned with SCDC’s LDF/Core Strategy. Following the previous rounds of consultation and the representations from the legal firms instructed by the action group NANT, a few minor changes have been made to the Appropriate Assessment and the Sustainability Appraisal, however these documents remain flawed, with inconsistent reasoning and a stubbornness of purpose which is quite remarkable.

Considering that the documents to which these revisions have been made has been 10 years in the making, it is a poor reflection of the council’s abilities.

WWG feels that the sum of the impact on protected wildlife areas of the 2000+ houses in the “area east of Ipswich” plus the 1,440 homes near Felixstowe has still not been considered. The whole of the Deben Estuary, including Martlesham Creek, Kirton Creek and Falkenham marshes, are part of the SPA and as such a full survey of existing visitor patterns should be carried out. Current estimates are based on figures from a rather limited survey carried out in 2004 and the anecdotal evidence from the small number of Land Managers consulted (Table 9.5.7.1). The limited survey carried out by NANT volunteers gives an indication of the attraction of a river side setting. Natural England are even recorded in the Revised AA, stating that “any development is likely to bring additional pressures to any of the sites of European interest, however, the area near Martlesham identified as preferred option could have particularly negative impacts on the Deben Estuary SPA/SSSI”. NE also expresses similar concern at the proposed development in the areas north of Candlet Road and Felixstowe town, but these comments seem to have been ignored.

Basing predicted patterns of visitor behaviour on a survey of heathland in Dorset is seriously flawed thinking, there are too many variables for scientific validity. Like should be compared with like, similar habitat, similar attractions, similar wider environment. It is nonsense to suggest that as the proposed development site in the “area east of Ipswich” is 1km away from the AONB, people will not walk to the European sites of interest (6.2.45) Natural England's national survey (5.8.9) shows 1.6km as the average distance people will walk from their homes and the NANT survey showed that people walked an average of 3.8km to reach the Deben Estuary. These figures put the European sites well within the range of “the area east of Ipswich”.

Mitigation and the much mentioned “Country Park” are put forward as protections for the European sites, but there are contradictions both within the Core Strategy and within common knowledge of SCC financial position. Where is the Country Park to be? Who will pay for its development and maintenance? When will it be available? The original suggestion of the Foxhall tip site (6.5 SP20) seems highly unsuitable, will there be a ban on smoking, barbecues and fireworks because of methane, will any ponds be carefully monitored for tip leachate? Noth the “high quality provision” (7.2.9) that people are being led to expect.

It is not only increasing pressure from walkers along the river banks, with or without dogs but an increase in boating activities which will occur if there is a large increase in population. This aspect has been largely disregarded. Canoeists, dinghy sailors and rowers close into the shore disturb feeding birds. The wash from larger motorboats not only disturbs wildlife but is detrimental to the saltmarsh habitat on which so many species rely.

In conclusion, WWG wishes to propose once again that the housing provision needs to be dispersed in small developments, with the inclusion of affordable homes, in villages and towns throughout the SCDC area. This would provide a more sustainable way forward for communities and for the environment.

Summary:

It is nonsense to suggest that as the proposed development site in the “area east of Ipswich” is 1km away from the AONB, people will not walk to the European sites of interest (6.2.45) Natural England's national survey (5.8.9) shows 1.6km as the average distance people will walk from their homes and the NANT survey showed that people walked an average of 3.8km to reach the Deben Estuary. These figures put the European sites well within the range of “the area east of Ipswich”.

Change to Plan

Not Specified  Not Specified  Not Specified  Not Specified  None

Attachments:  scanned letter

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Full Text:

Although a few changes have been made to the AA and SA documents, there remain several serious flaws.

1. The assessment of increased visitor impact appears still to be based on a survey carried out in 2004.

2. A limited number of Land Managers were consulted and their evidence was generally anecdotal.

3. A survey of an area of heathland in Dorset was used to help predict visitor patterns - this is too different a scenario for any valid conclusions to be drawn.

4. The total increase in population from all the development plans does not seem to have been factored in when considering the increased visitor impact on the European sites. By this I mean the proposed developments at Martlesham, Felixstowe and the Ipswich Borough Council area.

5. A Country Park is proposed to help to alleviate pressure on the European sites, this is supposed to be available for use before the proposed developments get underway. However the only site put forward is Foxhall Tip, which, it is stated further on the same document, will not be available for many years. A clear contradiction.

Summary:

A survey of an area of heathland in Dorset was used to help predict visitor patterns - this is too different a scenario for any valid conclusions to be drawn.

Change to Plan


Attachments:

Letter from Mrs A Maddison
full text
Despite some minor changes to these documents, there remain inconsistencies and invalid arguments:

1. No accurate and rigorous survey of current visitors to the river Deben has been undertaken. Instead figures from a 2004 survey, plus information from a totally different habitat (heathland) in a completely different part of the country (Dorset) have been used to make assumptions about the impact of the proposed development on the Natura 2000 sites.

2. If no accurate data are available for the current situation, how is it possible to make an estimate of future visitor impact from the three large developments proposed - Martlesham, Felixstowe and Ipswich Borough Council?

3. Foxhall tip is proposed as the site of a new Country Park, descriptions are given of the facilities it could provide and how it could attract visitors away from the European sites. However at one point it is stated that the Country Park should be available from the start of the developments and then says that "there is uncertainty as to when a country park could be delivered at Foxhall tip".

4. Who will fund and manage the Country Park? - wherever it might be.

Summary:
No accurate and rigorous survey of current visitors to the river Deben has been undertaken. Instead figures from a 2004 survey, plus information from a totally different habitat (heathland) in a completely different part of the country (Dorset) have been used to make assumptions about the impact of the proposed development on the Natura 2000 sites.
### Respondent: Mrs Gillian Mason [1677]  
**Agent:** N/A

**Full Text:**
I do not consider the level of housing proposed for Felixstowe to be sustainable or justifiable. Housing should be confined to brownfield sites and only then if required to fill a proven need.

**Summary:**
I do not consider the level of housing proposed for Felixstowe to be sustainable or justifiable. Housing should be confined to brownfield sites and only then if required to fill a proven need.

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### Attachments:

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The housing numbers proposed for Felixstowe cannot be justified or considered sustainable.

The housing numbers proposed for Felixstowe cannot be justified or considered sustainable.

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Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
The council has disqualified itself from being able to judge the issues objectively owing to participation by Members with personal interests - employment by BT, close family members employed by BT, or pensioners of BT. The LDF was tailored to fit the massive housing development which BT has proposed. The dependent well-being of the many Members of the council with financial links to BT corrupts the decision-making process. The adverse impact of the proposed development (which the LDF makes possible) appears not to register with some Members where their official role requires them to have put the public interest first.
These figures cannot be relied on, when proved in error it will be too late to remove this new town.

Summary:
These figures cannot be relied on, when proved in error it will be too late to remove this new town.

Change to Plan

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Attachments:
I OBJECT to the findings in the revised AA and SA dated August 2011.

Having read the document I see there are a number of factual errors and incorrect assumptions eg.

The riverside footpath along the River Deben opposite Methersgate Quay down river to Early Creek is noted as impassable. In fact the stretches that are impassable are either side of this stretch and the paths in between are well used. The assumption made from this incorrect information is that people do not walk the path. This is utter rubbish and the path north of Waldringfield forms part of a popular circular walk with the lesser used section north of Manor House still used by local walkers. To the south of Waldringfield the path to Early Creek is a walk in itself. People will walk as far as the breach and then turn back. The breach is positioned roughly where there is a breeding colony of terns. The fields to the inland side of this path both north and south are often used for shooting parties and the paths and river also used for wildfowling in season, amongst other activities.

Most of the visitor surveys carried out are not relevant the area around Martlesham Creek and Waldringfield as they relate to the other side of the Deben. By definition the west bank of the Deben lies much closer to the areas denoted for development and will suffer from much more visitor pressure. Although the survey carried out by NANT is not as comprehensive as some others at least some effort has been made to obtain relevant information relating to these areas. SCDC would appear to have made no effort to obtain any more relevant information and have in fact relied on out of date surveys carried out in Dorset where conditions were different. Incorrect conclusions have thus been drawn.

Parking at Waldringfield is seen as self limiting however although there is now some public parking in a pay and display car park at the Maybush this does not stop people parking at the Sailing Club and causing security and access issues there, but also causing congestion along the narrow access road down to the river along the main route through the village or parking at the car parks in Church Field or the village Hall and walking down to the river along the roads or footpaths. Securing the sailing club car park is not an easy matter as many differing groups require access including guests visiting for sailing events hence a secure barrier is not the simple answer.

Mitigation is seen as essential, however Country Parks are being closed by the County Council who cannot afford to run them anymore and the area suggested would not be available at the commencement of the plan nor indeed at the likely end date. What should residents do in the meantime? and what happens when the proposed area fails to materialise? By then it will be too late! 10 years is a long period of pressure to absorb before any mitigation plans would commence. A country park cannot possibly offer the same attractions as the River Deben and the beach at Waldringfield as this is the only beach along the river. This area is also threatened with having the added attraction of a pontoon close to the Pub to provide even more easy access for yachts and power boats.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Summary:
The riverside footpath along the River Deben opposite Methersgate Quay down river to Early Creek is noted as impassable. The stretches that are impassable are either side of this stretch and the paths in between are well used. The assumption made from this incorrect information is that people do not walk the path. This is utter rubbish and the path north of Waldringfield forms part of a popular circular walk with the lesser used section north of Manor House still used by local walkers. To the south of Waldringfield the path to Early Creek is a walk in itself.
Once again I find myself writing to object to the plans for Adastral Park. How long will it be before Suffolk Coastal listens to the wishes of local people on this issue?

Most particularly I object to the findings in the revised AA and SA dated August 2011 which do not take proper account of recent surveys and pay more attention to out of date and irrelevant data. I myself took part in the Deben Visitor Survey and interviewed between 30 and 40 walkers over a period of two days. Nearly everyone mentioned the peace and quiet and unspoiled beauty of the Deben as well as the wildlife, as their main reasons for visiting the area. Many, unprompted, mentioned their fear that the proposed new town would destroy this tranquility with deleterious effect on the wildlife.

Perhaps the Council do not realize what a treasured resource the Deben and surrounding areas are? I do urge the Council to reconsider the LDF and to take account of local peoples views. We do feel we ARE NOT BEING LISTENED TO.

Another example of this is your website. I tried to register a protest but found it impossible to use your consultation process. I managed to register with great difficulty but found the rest of it unfathomable. It is the least customer-friendly website I have ever come across. I am sure everyone would be grateful if you could make it simpler and easier to use.

Summary:

I object to the findings in the revised AA and SA dated August 2011 which do not take proper account of recent surveys and pay more attention to out of date and irrelevant data. I interviewed between 30 and 40 walkers over a period of two days. Nearly everyone mentioned the peace and quiet and unspoiled beauty of the Deben as well as the wildlife, as their main reasons for visiting the area. Many, unprompted, mentioned their fear that the proposed new town would destroy this tranquility with deleterious effect on the wildlife.
This letter is the formal submission from Save Felixstowe Countryside to the above consultations, as they affect the Felixstowe peninsula, and wishes to register its objection to all aspects of the consultations. We would ask you to note our comment that your on-line submission system is time-consuming, impossible to search sufficiently to target relevant comments and designed to deter stakeholders from responding.

With regard to sustainability, Save Felixstowe Countryside is concerned at the lack of evidence to support this in the following areas:

Traffic / Mitigation
The A14 to the Orwell Bridge is running at 90% capacity now, and the Port is said to be adding another 100,000+ lorries over the next ten years. 1760 new homes on the Felixstowe peninsula will potentially add another 3000 vehicles to the local road network which is already close to gridlock.

We believe that the LDF traffic mitigation aspirations are completely unrealistic and will have, at best, only marginal impacts on the extra congestion.

Mitigation measures are virtually impossible to put in place as it is unrealistic to limit new residents to the use of public or sustainable transport. Even people who live close to their place of work may choose to go by car as this offers a higher degree of flexibility and comfort than public transport or cycling/walking.

Infrastructure / Mitigation
There is no evidence to support the LDF's aspiration that developers will provide all/any of the infrastructure necessary to sustain housing numbers on this scale, and would inevitably look to the District to provide whatever was necessary - or the community would go without, which is the more likely option.

Employment / Mitigation
Currently there is almost total reliance on the Port of Felixstowe, with local tourism and service industries being in serious decline. The London Gateway Port at Southend, whose deep-water berth facilities will be available in less than two years, will pose a serious threat to the Port of Felixstowe which itself will be looking to save money and make savings through automation and reducing staff numbers. Their quote of providing 1600 more jobs is seen as propaganda to support their 125th anniversary celebrations, and is unsubstantiated by any evidence.

For the foreseeable future the economic climate does not offer any mitigation against reliance on one employer. Small specialist companies distributed across the District are likely to be the main sources of employment, therefore a sustainable planning policy would place increased housing within reach of those areas in order to reduce the reliance on commuting.

Affordable Housing / Mitigation
Suffolk Coastal has a 1 in 3 policy of Affordable Homes provision. However, in a number of current small developments this policy has been "factored out" as developers strive to build high-end homes in affluent areas. To compensate for this, they will look to concentrate lower-end homes all together, creating a "ghetto" effect which will detract from the quality of life enjoyed by people in the locality at present.

It is acknowledged within the Core Strategy that the future role of foreign economic migrants is not considered within the Plan. Therefore, to restrict Affordable Housing will be to exclude the inevitable influx of members of this group, while a large supply of executive higher-end homes will ensure the continuing influx of people of/nearing retirement age which the LDF does not consider a "sustainable" group.

Environment / Mitigation
Inevitable increases in traffic on the A.14 and local road network will increase air pollution on a peninsula already suffering light and noise pollution from a busy Port. This will have an unavoidable adverse effect on ALL residents which in our view does not support the planning policy as being sustainable.

Landscape / Mitigation
The visual landscape will be destroyed in many parts of the Felixstowe peninsula, and while no-one is entitled to a "view", taking away a visual amenity is known to have an adverse effect on morale and social behaviour within the local
community.

We also do not agree that sustainable development will respect the character of settlements and landscape, as the character of our rural landscape will be completely destroyed by any housing development.

Flooding / Mitigation

The David Lock report identified brownfield land within the peninsula which could accommodate hundreds of homes without any need to touch greenfield land. These sites were subsequently excluded on grounds that they were subject to flooding.

However, the Environment Agency allows development in flood risk areas where the benefits of development outweigh the risks, as long as these developments include mitigation measures to minimise the risk.

£10 million is currently being spent on new sea defences which are said to be necessary to protect "1000 homes and businesses for the next 100 years".

These defences would therefore provide the mitigation that would allow brownfield sites previously excluded to be brought back into the equation and preserve greenfield land for agricultural use, which was stated by Suffolk Coastal as one of its priorities following the Orwell Hotel meeting in August 2008.

Appropriate Assessment

The Rt Hon David Cameron, when he wrote to the National Trust, assured us that "sustainable development means maintaining a balance between economic, environmental and social concerns". However, we have seen no evidence of this being taken into account by Suffolk Coastal District Council when putting together its Core Strategy, which we continue to reject as being not economically viable, not environmentally friendly and undertaken without the support of the community.

Your own statements confirming that the above factors were considered during plan preparation would indicate that a thorough and independent examination of the plan and its implications had been undertaken. It is therefore a surprise to find that the main contributors are either employed by, or attached to, Suffolk County Council. As the County Council would itself benefit from new development on this scale, it is questionable whether the appraisal has been independently audited for sustainability and soundness.

General

In summary, Save Felixstowe Countryside rejects the Sustainability Appraisal and Appropriate Assessment consultations in their entirety. We also re-state our objection to the scale of new homes proposed for the Felixstowe peninsula and the proposal to build on greenfield land.

The District Council has now been relieved of its obligation to provide a statutory number of homes, and has been told by its own government to make its decisions in the best interests of the local area. It is our view that what is proposed for Felixstowe is not in the Town's best interests.

Summary: The David Lock report identified brownfield land within the peninsula which could accommodate hundreds of homes without any need to touch greenfield land. These sites were subsequently excluded on grounds that they were subject to flooding.

However, the EA allows development in flood risk areas where the benefits of development outweigh the risks, as long as these developments include mitigation measures to minimise the risk.

£10 million is currently being spent on new sea defences which are said to be necessary to protect "1000 homes and businesses for the next 100 years".

These defences would provide the mitigation that would allow brownfield sites to be developed enabling greenfield land to be retained for agricultural use.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
4040  Object
6 - Assessment of Each Policy 6.2: Policy SP2 (Housing Numbers)

full text
Full Text: The revised Appropriate Assessment and Sustainability Assessment dated August 2011 have not satisfied my objection to the housing policies in the LDF. The mitigation proposals include a country park but no proposed location which makes its effectiveness questionable or commitment to provide the facility.

I strongly object to the policy of allocating such a large amount of housing to the Eastern Ipswich Plan Area and in particular to the Adastral Park site.

Summary: I strongly object to the policy of allocating such a large amount of housing to the Eastern Ipswich Plan Area and in particular to the Adastral Park site.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments: Full text
I am writing to give my views on the revised Appropriate Assessment, which forms part of the Local Development Framework. I understand that this document is out for public consultation until October 14th 2011.

My comments and complaints are associated with the expected effect on the nearby environmentally sensitive sites, of the proposal to site 2000+ housing units at BT Martlesham.

There are two particular areas of the argument that I cannot accept. The first is that people are unlikely to walk further than 1km to an attractive site such as the Deben. NANT have provided a study, which suggests 3.8km as the average distance walked to this site. Clearly their study is unofficial and therefore not totally reliable, but the study used by the authors o the report is one made in Dorset in 2006 for a completely different type of site and is clearly not appropriate for the Deben.

The second is the calculation of new inhabitants at the level of 1.57 per new dwelling. I understand that this low figure comes from the Oxford Economics Study that SCDC rejected, and that it was based on a suggestion that in Suffolk Coastal around 1/3 of people moving into new housing would be moving out of existing housing in the same area. If this were true, for 2000 dwellings planned for Martlesham, 3140 people would be new to the area, while 1560 would come from the immediate neighbourhood. For the latter not to be swelling the local population, one must assume either that they were all living with their parents, or the dwellings they were living in would be left empty or demolished. Surely this cannot be a true state of affairs.

These two points must make the conclusion that as long as the houses are more than 1km from the Deben SPA unsafe.
Comment

With regard to the above consultation, I make the following comments:

Sustainability Appraisal

I am sure this will be a valuable document but I am not expert enough to ascertain how correct it is but suggest that before it is submitted eventually to the Planning Inspectorate an independent unbiased person/company are given the opportunity to ensure it is correct. Only having a November 2010 Core Strategy, it is difficult and time consuming to check whether or not the corrections and deletions have been made.

Appropriate Assessment

I believe that had it not been for Mr Buxton's letter on behalf of NANT dated 8th July which highlighted inaccurate information and inconsistencies together with NANTS Visitor Survey which was conducted over 16 days in April and May, and the pertinent comments by Simon Cairns of SPS, the Appropriate Assessment would have been submitted to the Inspector as first published.

This new version - August 2011 - has as a result been modified, updated, increased to 54 pages in 2011 from 34 in 2009 but I feel there are still many flaws to many of the sections where detail is glossed over without enough up to date evidence or fact. The changes are minor and considering it is seven years since it was first drawn up and with all the various input of various bodies and Natural England national visitor survey and NANT’s Visitor Survey earlier this year, I am surprised at how little the revised AA document has changed.

The revised version includes additional paragraphs/sections, changes to various tables and references to areas but these bear little relationship to Suffolk Coastal and the pressure on valuable European protected sites that huge increases in tourists and local dog walkers, bird watchers etc. to these sites, are making.

I suggest too, that instead of quoting Dorset as a study area of heathland, you conduct a study here in Suffolk to see what the residual disturbance of birds caused by local people engaged in low key recreational activities on European sites is, it would make it a more credible document. Afterall, visitor numbers to these areas along the River Deben and River Orwell have increased enormously.

Mitigation for Policy SP2 Housing numbers

In 7.2.10, 7.2.11 and 7.2.15 “A new Country Park or similar” is mentioned. It would be helpful if you could indicate where the Country Park is going to be (one presumes on the Foxhall Tip but this is not confirmed) and also where “similar” high quality provision is going to be in the Ipswich Policy Area. This Peninsula and the surrounds of Ipswich do not have hundreds of spares acres waiting to be turned into “green space”. You mention three Country Parks 7.2.13 throughout the County but they all provide Park/green space areas of 13ha. x2 or158ha. This part of Suffolk does not possess that amount of spare land to offer areas for dog walkers away from heathland sites, capable of offering visitor parking, WCs etc. and as a result is a laughable idea and in not way will be possible especially with the present economic climate where funding is in short supply. I cannot see this provision occurring to form a substantial part of your future mitigation programme to preserve the European sites etc., and all that is so valuable to Suffolk Coastal’s unique habitat in providing much needed greenspace for a huge Housing Development at Adastral Park.

I see no reference to mitigation to the AONB areas bordering the Rivers Deben and Orwell. The impact that 1,440 dwellings close by will impact on the vital habitat and estuaries close to Felixstowe and the Trimleys.

I feel this section on Mitigation is very “woolley” in the revised AA.

I personally have noted in the last twenty five years a huge decline in wild birds. For many years flocks of geese grazed on the fields to the right of my cottage and hundreds of lapwings grazed on the fields to my left. Now neither birds graze. Fieldfares and the lark too have disappeared - the volume of traffic, diesel fumes, increase of buildings, dog walkers, combined with "set aside", which I feel did more damage than good to our natural habitat, has I feel, contributed to the decline and the proposal of 2000 plus dwellings at Adastral Park and 1,440 dwellings down the road at Trimley/Felixstowe four miles away along with all the extra people, cars etc., will totally destroy any bird and wild life, fauna and flora in this area and give a totally urban look to the District. The Mitigation measures suggested will do little to preserve what we at present have, on the AONB, Triple SI and Ramsar sites.

Conclusion

Despite the fact that several “bodies” have brought about a revision of the AA, I am still not convinced that there is any real change backed up by up-to-date current evidence in the August 2011 documents compared with those in September 2009 version.

The integrity of the Deben Estuary will be affected by the proposals for 2000 plus dwellings at Adastral Park and 1440 dwellings further down the road and the proposed mitigation measures mentioned are inadequate and unproven and will result in a serious adverse effect on the Deben Estuary.

Summary

The integrity of the Deben Estuary will be affected by the proposals for 2000 plus dwellings at Adastral Park and 1440 dwellings further down the road and the proposed mitigation measures mentioned are inadequate and unproven and will result in a serious adverse effect on the Deben Estuary.

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### Comment
6 - Assessment of Each Policy

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**Attachments:**

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I wish to register my OBJECTION to the Appropriate Assessment (AA) & Sustainability Appraisal (SA) documents (August 2011) which are being used to support SCDC's current LDF draft proposal.

The AA & SA are incomplete and inconsistent, with essential mitigation measures (e.g. Country Park near Martlesham) unlikely be implemented in the timescale of the LDF. Furthermore the documents could be viewed as biased and formulated to promote the LDF without giving a balanced viewpoint.

I believe that AA and SA need further work and consequently that the LDF should be passed back to the Full Council for further debate.

Full Response

I wish to register my OBJECTION to the Appropriate Assessment (AA) & Sustainability Appraisal (SA) documents (August 2011) which are being used to support SCDC's current LDF draft proposal.

My main concerns are related to the East of Ipswich Plan Area and SP20 and the way SCDC has conducted itself in the development of the LDF.

The reasons for my objection are that the AA & SA documents, and therefore the LDF proposal, are:

1) Incomplete - important mitigation measures (e.g. provision of a Country Park near Martlesham) have not been clearly identified and costed, and by the report's own admission may not be implemented or funded within the timescale of the proposed LDF. As a consequence, such mitigation must be deemed invalid and should be struck from the report.
2) Inconsistent - important data has been acknowledged (e.g. South Sandlings Survey) but ignored in any conclusions, this leaves the reader to form the view that the report is biased and has been formulated in such a way as to promote the proposed LDF.

The LDF proposal and outstanding BT application for Adastral Park (and surrounding land) are inextricably linked. This relationship has been always denied by SCDC since BT's original application in 2008, but Andy Smith (SCDC Planning Portfolio holder) finally admitted it at the public Scrutiny Meeting held on 17th Jan 2011. This statement has never been widely reported or officially minuted only those present at the meeting heard his response which leads one to believe SCDC is embarrassed by the link.

I therefore believe that all public consultations since and including 2008 have therefore misled the public in SCDC consultation's terms of reference.

The AA or SA refer to the increased traffic load, congestion and pollution but don't take into account the major changes to road infrastructure (i.e. A12 at Martlesham) which are planned. Old survey data is used and no account taken of the increased heavy loads using A12 if Sizewell C plans go ahead.

The conversion of 3 roundabouts within half mile of BT Adastral Park entrance to traffic light controlled crossroads will cause an increase of toxic pollution to Martlesham residents due to an increase in stationary traffic. These new crossroads will be the ONLY CROSSROADS ON THE A12 BETWEEN THE M25 AND LOWESTOFT which is an indication of how poorly thought out the new road infrastructure plans have been developed for such an important arterial road.

Traffic lights can fail and therefore halt traffic but roundabouts always allow continuous traffic flow. The use of traffic light controlled junctions is a sign of SCDC's desperation to impose urbanisation on rural and semi-rural villages to accommodate BT. This can be perceived as bias to one local employer.

SCDC make great play of the sustainability aspects of co-siting a single large housing development (2000+ homes) next to BT Adastral Park but the argument for this approach does not hold up to scrutiny for the following reasons:
1) It will not reduce traffic as not everyone living in the new development will work at Adastral Park and with extra visitors will in fact increase the traffic movements in the area.
2) BT has stated that it MAY only develop its site when market conditions are right but it wants the housing development NOW (i.e. NO guarantee of jobs but pressure being applied to guarantee an increase in land value/profit for BT) at the expense of environment to the existing communities of Martlesham, Kesgrave, Waldringfield, Kirton, and Brightwell.

I believe that AAS and SA need further work and consequently that the LDF should be passed back to the full Council for further debate.

Summary:

SCDC make great play of the sustainability aspects of co-siting a single large housing development (2000+ homes) next to BT Adastral Park but the argument for this approach does not hold up to scrutiny for the following reasons:
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**Attachments:**
The revision of the LDF Core Strategy docs does not address sufficiently my objections which I wrote about in my previous letter. There has been little importance given to the impact of 2000 houses on the wildlife areas around the Deben Estuary and the large number of visitors to the Area. It seems that it is easier for SCDC to say ‘No further work is required for the Core Strategy to progress’. This is not proper consultation.

Summary: There has been little importance given to the impact of 2000 houses on the wildlife areas around the Deben Estuary and the large number of visitors to the Area.
Comment

6 - Assessment of Each Policy

6.2: Policy SP2 (Housing Numbers)

Respondent: The Felixstowe Society (Mr Philip Johns) [53]  Agent: N/A

Full Text: The following comments originate from The Felixstowe Society, which as you are aware is registered with the Civic Trust.

With regard to the Appropriate Assessment Documents, page 32 6.2.3 refers, includes that statement that 1760 housing applications are proposed in the Felixstowe and Trimley peninsula up to the year 2027. This number is confirmed in Table 3. Appendix 5.2.12.

We are concerned with the proposed increase in the numbers for this area from the figures given in the Amended LDF Core Strategy 2009. In this the proposed housing numbers for Felixstowe and the Trimleys was reduced from 1600 to 1000.

It would seem appropriate that the early review due in 2015 and subsequent reviews would enable an increase on the 1000 number to be implemented if necessary. This would do much to allay concern by all residents of these districts. This action would concur with Felixstowe Town Council, The Felixstowe Society and other concerned groups proposals regarding the LDF Framework on future housing needs for the Felixstowe peninsula.

We also wish to point out that the Government Targets for Housing numbers set by the previous government no longer apply and that a recent statement by the Communities Secretary stated that “Green Belt land surrounding towns and cities is to be protected from housing development and that it will not longer be possible to concrete over large swathes of the country without any regard to what people want” The Felixstowe Society is most alarmed and concerned that the current proposals by Suffolk Coastal District Council have completely ignored the results of public consultation.

Summary: With regard to the Appropriate Assessment Documents, page 32 6.2.3 refers, includes that statement that 1760 housing applications are proposed in the Felixstowe and Trimley peninsula up to the year 2027. This number is confirmed in Table 3. Appendix 5.2.12.

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Attachments: scanned letter

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Attachments:
scanned letter
We wish to make the following comments.

1. It would appear that Suffolk Coastal has already ignored public opinion and government legislation and designated the Grade 1 farmland adjacent to Treetops as a ‘site identified as sustainable for housing’ - Ref. Walton Green.co.uk
   a) This directly contravenes existing government guidance which states that Grade 1 farmland should not be built on:
   Planning Policy Statement 7 (PPS7): Sustainable Development in rural Areas - paras 28 and 29
   Securing the Future - Delivering UK Sustainable Development Strategy - chapter 5
   A Better Quality of Life
   The Countryside - Environmental Quality and Economic and social Development - paras 2.17 and 2.18
   b) Having contacted the prime minister and our local MP we also have it on good authority that it may contravene the forthcoming National Planning Policy Framework due in April 2012 which will contain sustainable planning guidance relating to rural areas and the preservation of prime farmland.
   c) Being as it is now estimated that only 5% of Britain's farmland is designated Grade 1 why has Suffolk Coastal identified i's only areas of Grade 1 farmland as 'sustainable for housing'?  
   d) This goes against the Felixstowe Town Council proposal to 'take a strategic approach, avoiding prime agricultural land where possible'.
   e) This also contravenes your own Strategic Policy SP1 - Sustainable development, section 11 - 'to conserve soil resources and quality.
   f) And goes against Strategic Policy 21 'whilst preserving as far as possible prime agricultural land for essential food production'.

   We would therefore ask you to reconsider this designation.

2. We support the element of Strategic Policy SP21 - Felixstowe 'Expansion of the retail, service and other facilities available within the town centre will be supported to meet the needs of the whole population both resident and visitor’ and Strategic Policy SP6 - Regeneration ‘The town centres where concern exists over the impact of out-of-centre stores’.
   a) Development of our town centre is crucial to Felixstowe. Whilst Suffolk Coastal may have had a lower percentage of vacant town centre units than other areas of Suffolk in 2005/6 our town centre now suggests otherwise. Development is crucial.
   b) As such we strongly object to any proposals for another supermarket in Felixstowe. We are already served by Morrisons, Solar and Lidl as well as Iceland and Tesco in the town centre. None of these is overcrowded.
   c) The small shops in Walton are well used and appreciated by the locals. Under Strategic Policy SP21 they should be preserved and protected.

   We would therefore ask you to consider these points from your own Core Strategy should any planning applications for a supermarket be made.

3. We support the proposal for areas of open space for recreational exercise: ‘such open space should be developed in the context of habitat creation, creating physical corridors or stepping stones’ - 1.2 Likely significant effects of core strategy policies and mitigation required.
   a) there are insufficient park/recreational areas in Felixstowe for the present number of residents.
   b) Additional allotments are required.

   Should you still wish to consider prime agricultural land as suitable for development we would ask you to consider either of the above options for its development.

Summary: object to development on prime agricultural land near Walton

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Not Specified Not Specified Not Specified Not Specified None

Attachments:
I am writing to object to the Appropriate Assessment report, dated August 2011. In particular I disagree with the conclusions regarding the impact on The Deben Estuary close to Martlesham and Waldringfield. It is clear that the impact will be much greater than the report suggests.

Several of the assumptions used cannot be substantiated. For instance the household size is simply a projection of past trends. There are many reasons why this figure can be challenged: particularly in light of the continuing economic downturn and fuel poverty amongst the elderly and single person households. Even this low figure has been reduced further to 1.57 by considering the district as a whole. When calculating the number of “new people” in the area close to the Deben Estuary at Waldringfield the correct figure should be 2.3 or more. Any calculations based on the low figure are therefore incorrect when applied to specific locations.

The Natural England national visitor survey states that two-thirds of visits were taken within 3.2km of the respondents home. The LDF is proposing that the number of dwellings within this distance from Waldringfield should be increased from around 360 to 2400 or more, with a consequential increase of population of about 600%. The Deben Estuary at Waldringfield and Martlesham are the only areas of public green space within 3.2km of the proposed new settlement and the resulting increase in visitor numbers would have a devastating effect.

Although the report concentrates on the effect of dog walking, there are other problems resulting from increased visitor numbers. As Waldringfield Harbourmaster, I have seen an increasing number of powered vessels launching from Waldringfield. The owners of these vessels are mainly from within 5 miles and I would expect an increase in the local population to result in much more pressure in this respect. The owners often disregard the SCDC speed limit on the river and cause noise and disturbance to birds and other wildlife and erosion to the river banks.

During the summer months I am also aware of an increasing amount of litter from picnics, discarded crabbing lines and bait (mainly bacon and raw meat). This is often left by groups of young people who arrive by cycle. It is likely that they are from the local area (east of Ipswich) and any increase of the local population will certainly exacerbate this problem. Although it is assumed that limited car parking will impose a limit on visitor numbers, the proposed new development is within walking or cycling distance of Waldringfield and the number of visitors from this development would not be so constrained.

It is inconceivable that any of the proposed mitigation measures will have any effect on any of these problems.

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I have read through the Sustainability and Appropriate Assessment documents referred to in your email of 25 August and have the following comments to make:

1. The number of 7590 new dwellings seems to have been confirmed but I agree with the comment that these additional houses between now and 2027 containing an average of 2.25 persons each will most certainly have an adverse effect on the integrity of the area in Suffolk Coastal. It is the responsibility of the Council and the communities to protect the European sites, Ramsar, SSSI, nature reserves and the countryside from overbuilding, unsustainable increases in resident population and most importantly to regulate the numbers of additional tourists.

2. Any additional housing should specifically be for local residents including most importantly first time buyers and should not be designed for 'new people' or second homes. Build to let for those current residents not able to afford a mortgage but to attend a job in a workplace in the District would be a priority case, as a stepping stone for house ownership later.

3. The views of land managers should be regarded as keystones in the resulting policy approval of the Core Strategy, and the Council should be guided by them as they are the prime players in the scenario. The use of countryside landscape green field sites must be avoided at all costs. So called greenfield sites within the boundaries of towns and villages could be candidates for housing development.

4. The reason why there is such a high percentage (over 80%) of residents agreeing that Suffolk Coastal is a good area in which to live and bring up families, is because Suffolk is as it is today, not because of what the developers would have it to be in the future.

5. The services and infrastructure we have today are stretched to their absolute limit. Who in the third millennium would imagine that dwellings within the boundary of towns and villages are still on their own sewerage systems, have unlit roads, no pavements or curbs, private drinking water supplies, overhead electricity supply, inadequate road systems, insufficient post offices forcing residents to increase their carbon footprint even to post a letter and a whole host of other inadequacies, absence of fire hydrants and police patrols on the ground, yet the Core Strategy attempts to increase the numbers of houses so dramatically, it beggars belief. If the council is unable to maintain a reasonable service for the current demand, how does it expect to offer a reasonable service to an expanded community?

6. There have to be two exceptions to the above case, in that the nuclear facility at Sizewell and the docks at Felixstowe are essential service providers for the District and beyond and there may be a case for additional and limited housing for work for local residents primarily and for a very limited number of 'new people' with highly specialist skills only. Naturally, the additional housing needs would be met within a very short radius of these operations.

Thank you very much for the opportunity for consultation.

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Firstly we wish to complain that the online response system is not sufficiently accessible for members of the general public. Being asked to submit responses within specific sections of two very long documents only works if stakeholders want to make specific comments at these particular points. This system discourages general comments. Splitting the document into sections also means that it is impossible to search comprehensively. In fact, the process is so complicated and time consuming it could discourage stakeholders from making any comments at all.

Also we wish to complain that the website shows 2 conflicting times for the end of the consultation - on one page it states 4.45 pm and on another it states 04.45. This has been brought to the attention of the Chief Executive of SCDC.

Consultation response

NANT OBJECTS to the findings in the revised AA and SA dated August 2011.

The issues identified in our previous consultation responses of January 2011 and subsequent letters to the council have not been addressed by the revisions in the AA and SA.

The latest version of the Appropriate Assessment demonstrates a lack of rigour when presenting “evidence” for assessing environmental risk, some examples:

- It concedes that no data is available on visitor numbers to the nearby Deben Estuary and yet still goes on to draw unfounded conclusions regarding the impact on the area of 2000 houses at Martlesham. New data such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then to a great extent, ignored in the conclusions.
- Although it now acknowledges that there is public car parking Waldringfield it describes this as limited. No car park in the world has an infinite number of parking spaces so that statement is literally correct. However, the car park rarely reaches capacity and is capable of accommodating a significant increase in numbers of visitors.
- Using this incorrect data it draws the erroneous conclusion that visitors would not be able to arrive by car and would have to arrive on foot.
- It further concludes that this means that as long as the houses are more than 1km from the river, the new residents will not visit the river, therefore there will be no impact on the Internationally Protected Deben Estuary.
- It relies on an out of date 2006 study from Dorset to make the 1km assumption even though later studies produced in 2008 and 2009 draw quite different conclusions as does the South Sandlings Survey.
- It states that there are breaches in the sea wall and therefore people can not go for circular walks and disturb the over wintering birds and other wildlife. Yes there are breaches, but at greater distances from Waldringfield than stated in the AA. In fact these are precisely at the area best known for over-wintering birds. The Deben Estuary Survey shows that many people use Waldringfield as the starting point for riverside walks.
- Some of the proposed mitigation relies on the as yet undefined green space to the north of Ipswich, and/or the conversion of the Foxhall tip to a country park, which elsewhere is highlighted as being undeliverable during the lifetime of the LDF.
- The AA concludes that because of the limited information on visitor numbers, and therefore the inability to assess the impact of the 2000 houses at Martlesham, a full visitor survey should be commissioned by others in order to determine appropriate mitigation. That makes sense - it then states that this is not necessary for the core strategy. This might apply if the LDF was a true “strategic” document. However, the authors of this Core Strategy have decided to include detailed site-specific housing allocations within the LDF, it is therefore essential, logical and fair that site-specific, deliverable mitigation is correctly determined before progressing any further.

On the basis of the significant anomalies and inaccurate information within the AA and the SA the LDF should be returned to the cabinet for further debate.

Janet Elliot
Mill Cottage
Mill Road
Waldringfield
IP12 4PY

On behalf of the 4000+ supporters of NANT

Summary:

although it now acknowledges that there is public car parking Waldringfield it describes this as limited. No car park in the world has an infinite number of parking spaces so that statement is literally correct. However, the car park rarely reaches capacity and is capable of accommodating a significant increase in numbers of visitors. Using this incorrect data it draws the erroneous conclusion that visitors would not be able to arrive by car and...
4324 Object

6 - Assessment of Each Policy

would have to arrive on foot

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full text

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Firstly we wish to complain that the online response system is not sufficiently accessible for members of the general public. Being asked to submit responses within specific sections of two very long documents only works if stakeholders want to make specific comments at these particular points. This system discourages general comments. Splitting the document into sections also means that it is impossible to search comprehensively. In fact, the process is so complicated and time consuming it could discourage stakeholders from making any comments at all.

Also we wish to complain that the website shows 2 conflicting times for the end of the consultation - on one page it states 4.45 pm and on another it states 04.45. This has been brought to the attention of the Chief Executive of SCDC.

Consultation response

NANT OBJECTS to the findings in the revised AA and SA dated August 2011.

The issues identified in our previous consultation responses of January 2011 and subsequent letters to the council have not been addressed by the revisions in the AA and SA.

The latest version of the Appropriate Assessment demonstrates a lack of rigour when presenting "evidence" for assessing environmental risk, some examples

1. if it concedes that no data is available on visitor numbers to the nearby Deben Estuary and yet still goes on to draw unfounded conclusions regarding the impact on the area of 2000 houses at Martlesham. New data such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then to a great extent, ignored in the conclusions.
2. although it now acknowledges that there is public car parking Waldringfield it describes this as limited. No car park in the world has an infinite number of parking spaces so that statement is literally correct. However, the car park rarely reaches capacity and is capable of accommodating a significant increase in numbers of visitors.
3. using this incorrect data it draws the erroneous conclusion that visitors would therefore not be able to arrive by car and would have to arrive on foot
4. it further concludes that this means that as long as the houses are more than 1km from the river, the new residents will not visit the river, therefore there will be no impact on the Internationally Protected Deben Estuary
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6. it states that there are breaches in the sea wall and therefore people can not go for circular walks and disturb the over wintering birds and other wildlife. Yes there are breaches, but at greater distances from Waldringfield than stated in the AA. In fact these are precisely at the area best known for over-wintering birds. The Deben Estuary Survey shows that many people use Waldringfield as the starting point for riverside walks.
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On behalf of the 4000+ supporters of NANT

Summary:

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Comment

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6 - Assessment of Each Policy

Impact on the suite of European Sites in the wider area

Respondent: Waldringfield Parish Council (Mrs Jean Potter) [509]  
Agent: N/A

Full Text:

Á§5 Methods of assessing European site visitor increases from an increased human population

Point 1, Summary:

There is no up-to-date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites of concern to the Appropriate Assessment. Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"There is a limited amount of data regarding the quantity of visitors to European sites" (Á§5.1.10). Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available, and can be used to predict increases in visitor numbers from new housing." (Á§5.1.10). This survey covers the AONB as a whole. It makes no mention of the Deben Estuary SPA/SSSI/RAMSAR Site. Neither does it mention the other SSSIs near to Adastral Park (Newbourne Springs, Ipswich Heaths and Sink Valley, Kesgrave), because they are not in the AONB.

The only interview locations on the River Deben are at Melton and Bawdsey, which are irrelevant to the proposed housing at Adastral Park and Felixstowe. All the interviews were conducted in August, none in spring, autumn or winter. These facts make the AONB 2004 survey completely irrelevant to any prediction of increases in visitor numbers from new housing. In particular, the phrase "can be used to predict increases in visitor numbers from new housing" refers to visitors to the European Sites potentially affected, as listed in Á§2.2. AONB (European sites potentially affected) it makes no mention of the AONB.

Throughout Á§5.3 (Calculations to predict additional visitors to European sites across the Suffolk Coast and Heaths AONB using Tourist Board data) the distinction between the AONB and the European Sites is regularly confused. For example:

* in Á§5.3.7 it says: "Many of the sites in the AONB involved in the visitor study were European sites, so the study is relevant to this Appropriate Assessment." The AONB (2004) study makes no mention of (and certainly does not "involve") any environmentally designated sites, European or otherwise.

* In Á§5.3.21 it says: "... roughly one-quarter of all visits to the AONB originate from Ipswich Borough and Suffolk Coastal District. This assumption is also applied to the European sites within the AONB." On what basis is this assumption also applied to European sites within the AONB?

* In Á§5.3.18 it says: "Table 6 shows that the increase in visitors to the Suffolk Coast and Heaths AONB, as a result of the proposed developments is predicted to be 2.83%." In Á§5.3.25 it says: "To allow for these assumptions, the approximate 2.83% increase in total visitors to the AONB is given as a range of 2% - 5%." (our emphasis). Both of these refer to the AONB, not any European Site or Sites. But then in Á§5.3.26 it says: "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% ... " No justification is given for jumping from a conclusion about visitors to the AONB to one about visitors to European Sites.

Not only is there a confusion between the AONB and European Sites within the AONB, but no attempt is made in Á§5.3 to distinguish between individual European Sites. For example, the Deben Estuary SPA is obviously more likely to receive a greater increase in visitors due the proposed housing at Adastral Park than more northerly sites such as the Minsmere-Walberswick SPA, but this is not mentioned. (The discussion of the South Sandlings Survey in Á§5.5 rectifies this for the European Sites within the survey area, but of course this does not cover the Deben Estuary, and it does not clarify the confusions in Á§5.3.)

Point 2, Summary:

The estimate of the net increase in people for the East Ipswich Plan Area, based as it is on 1.57 new people per dwelling, is a serious under-estimate. The figure of 1.57 comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. It contains the absurd hidden assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding. There is no evidence that there is any overcrowding in these villages.

In Á§5.3.9 to Á§5.13, and particularly in Table 3, an attempt is made to estimate the increase in population due to the proposed housing. To do this it uses the 'number of new people per new dwelling', which in Suffolk Coastal is supposed to be 1.57. This is more realistic than the previous figure of 0.9, but is still seriously flawed. It comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. According to the Oxford Economics Study the occupancy rate in the East was 2.31 (in 2009) decreasing to 2.22 (in 2027), giving an average of 2.27. (p34)

In Á§5.3.9 the figure of 1.57 is explained: "This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy." It is extremely unlikely that any of the 2,000 dwellings proposed for Adastral Park will be bought for holiday homes, so the difference between the 4,540 (2,000x2.27) new occupants and the 3,140 (2,000x1.57) new people to the area must be accounted for by assuming that 1,400 (4,540-3,140) people will move to Adastral Park because of the fragmentation of multiple person households in the area, and so will not be adding to the number of extra people living near the Deben Estuary. This dubious assumption is not explained or even mentioned, let alone properly justified. It is in fact totally implausible.

In order for an occupant of the new housing at Adastral Park not to count as a 'new' additional person, he/she must:...
1. move to Adastral Park from somewhere at least equally near the Deben Estuary (approximately)
2. move out of a multiple person household into one with the same or lower occupancy at Adastral Park
3. not be replaced by anyone moving into the area from further afield
4. not be part of a house-moving chain involving anyone moving into the area from further afield

The only places that qualify for inclusion in (1) are: Waldringfield, Newbourne, Hemley, Brightwell, Martlesham Village and Martlesham Heath (just). Kesgrave and Grange Farm are roughly twice the distance from the Deben Estuary so can be excluded, and Woodbridge can be excluded because although it is on the River Deben, it is not on a sensitive part: "the Deben Estuary is not assessed by Natural England as being unfavourable due to human disturbance" (A§6.2.35).

The combined populations of these 6 villages is 6,630 so the Appropriate Assessment contains the absurd hidden assumption that 1,400 (21%) of the residents of these villages will move to Adastral Park because of pressures of overcrowding. There is no evidence that there is any overcrowding in these areas, or that there is any desire for the residents to move to the proposed housing at Adastral Park - the idea is quite ludicrous.

The upshot of this is that the figure of 3,462 for the 'Estimated net increase in people' for the East Ipswich Plan Area, (Table 3), based as it on 1.57 new people per dwelling, is a serious under-estimate. It is far more likely that the entire population of the 2,000 new houses at Adastral Park will come from outside the immediate area, and will be about 4,540 (2,000x2.27).

The same critique can be applied to the Felixstowe, Walton and the Trimleys figure of 2,763 (Table 3).

Point 3, Summary:
The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing the upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.  
The actual increase in the number of people visiting the sites is not given, because the current number of visitors is unknown (because of the lack of a proper survey - see above).

The assumptions given in A§5.3.14 are all highly dubious (except one):
* "the pattern of day visits to sites by the new residents is similar to that of the existing population" This is very unlikely.
* The proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries.

* "the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey" It is not clear if ‘sites’ is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.

* "an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity" OK, this is an acceptable assumption.

* "the relative proportions of day visitors and overnight visitors does not change" Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase.

* "the summer snapshot survey is typical of visitors all year round." This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to - be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

Table 4 (A§5.3.13), second column reads ‘Estimated increase in people (table 2)’. The data is actually taken from Table 3.

Table 5 (A§5.3.16), second column reads ‘proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1’. The data is actually taken from Table 2.

The calculations in Table 5 and described in A§5.3.15 are an attempt to predict the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as stated in the title of Table 6. However, in several places the restriction (in bold above) is not made clear, for example in A§5.3.14-16. This gives the impression that it predicts the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from all potential sources. 50.5% of the total day visitors to the AONB come from outside Suffolk Coastal and Ipswich Borough/Pinewood. Increases in the populations in the areas these people come from have been excluded from the calculations. This is unrealistic - Babergh, Tendring, Waveney and all the other nearby districts all have LDF Core Strategies that propose large housing allocations and correspondingly large increases in populations.

The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as described in A§5.3.15 and shown in Table 5, is logically flawed. Column A only includes day visitors who live in Suffolk Coastal and Ipswich Borough/Pinewood. In Column B this is multiplied by the proportion of visitors who are day visitors (55%). However, the figure of 55% applies to visitors from all locations, not just those from Suffolk Coastal and Ipswich Borough/Pinewood. Common sense tells us that local visitors are more likely to be on day trips than those coming from further afield, and this is confirmed by comparing Map3 (p11) with Map 4 (p12) in the Suffolk Coast and Heaths AONB Survey (2004). It is therefore reasonable to assume that a far larger value than 55% should be used as the multiplier in Column B (the data shown in the Suffolk Coast and Heaths AONB Survey (2004) isn't sufficiently detailed to tell us what the value should be.) In fact it would be much more realistic to have different multipliers for the different areas - for example we know that about 95% of visitors to Martlesham are on day trips (Suffolk Coast and Heaths AONB Survey (2004) Chart 3), so if most of these came from

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the East Ipswich Plan Area we could use 95% as the multiplier in Column B, 2nd row.

Two of the three assumptions given in A§5.3.23 are highly dubious:

* "New' people in the Borough / District will have the same visiting pattern as 'existing' people" This is very unlikely - see comments on A§5.3.14, first bullet point

* "Visits by holiday makers will not be affected by any increased use by local visitors" It is possible that overcrowding at popular sites will put off holidaymakers. Holiday makers generally want to visit unspoiled countryside; the urbanisation resulting from the housing allocations, particularly at Adastral Park, is very likely to deter holidaymakers.

* "Sites, including their car parks, will not constrain the number of visits by becoming 'full' and turning away visitors" OK, this is an acceptable assumption.

The uncertainties in the calculations are acknowledged by the vagueness of the conclusion (A§5.3.26): "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% as a result ... " It would also be reasonable to assume that the increase is far higher than 5%. What justification is there for choosing 5% as the upper limit rather than, say, 10%? The flaws in the methodology, the likelihood that the assumptions in A§5.3.14 and A§5.3.23 are invalid, and the inappropriateness of using the Suffolk Coast and Heaths AONB Survey (2004) results in the first place all combine to make this conclusion completely worthless.

Point 4, Summary:
The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the proposed new housing in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area than the average across the AONB. One would expect the increase in the number of visitors to the Orwell and Deben Estuary SPAs to be far greater than the 8.8% estimated for the South Sandlings area. Nowhere is this obvious conclusion stated.

Another reason the figure of 2-5% is worthless is that it is an average across the whole of the AONB. 77% of the proposed new housing is in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area, all of which are far closer to the Orwell and Deben Estuaries than the other European Sites in the AONB, and these sites will therefore receive a far greater increase in visitors than the average across the whole of the AONB. Even if the figure of 2-5% is correct it tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs. This point is made in A§5.8.1 with regard to the South Sandlings area "Fewer people living in or east of Ipswich might visit distant parts of the AONB compared to the South Sandlings, thus having a smaller impact over the AONB", but unfortunately the obvious extension of this argument to the Deben and Orwell Estuaries hasn't been made.

"It is a reasonable assumption that an increase in dwellings would generate a proportionate increase in visitors from any particular distance band. For example, if the number of houses doubled in a particular distance band the number of visitors from that area would also double" (A§5.6). We agree with this. It is a pity that this logic can't also be applied to the impact on the Deben Estuary of the 2,000 houses proposed for Adastral Park. The calculation method described in A§5.5.9 and A§5.10 seems to be far more realistic than those used in A§5.3 (criticised above), and there seems to be no good reason why it couldn't also be applied the Adastral Park - Deben Estuary situation if basic data on visitor numbers were known.

"The distribution of proposed housing is not precisely specified within the Core Strategies." (A§5.5.7) This is not entirely true. One of our main complaints about the SCDC LDF Core Strategy is that it is very site-specific. 2,000 houses 'to the south and east of Adastral Park' could hardly be more site-specific.

In A§5.5.12 the increase in the number of visitors to the South Sandlings area as a result of the Ipswich and Suffolk Coastal Core Strategies is predicted to be 8.8% (broadened to 6-12% in A§5.5.14). Most of the housing proposed in these Core Strategies is far nearer to the Deben Estuary than it is to the South Sandlings area, so one would expect the increase in the number of visitors to the former to be far greater than 8.8%. Nowhere is this obvious conclusion stated. (No estimate is given for the increase in the number of visitors to the Deben Estuary as a result of the Ipswich and Suffolk Coastal Core Strategies, which is a pity as this is the SPA most affected by the extra housing.)

Point 5, Summary:
The claim that people are unlikely to walk further than 1km is absurd. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.

Throughout A§5.6 various references are made to the ridiculous claims that people are unlikely to walk further than 1km or drive further than 8km. For example: "...only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur..." (A§5.6.6). These are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed. The 1km figure is invalid because:

1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked less than 1km was that they lived less than 1km from the site, so didn't need to walk further.
3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

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The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk further than 1km to reach an attractive area like the River Deben. The inappropriateness of the 1km figure is borne out by the Deben Estuary Survey, which shows that 57.1% (far more than the 11% in Dorset) of visitors to the River Deben who arrived on foot walked more than 1km (Deben Estuary Survey, Ä§2.19). The average distance travelled by people on foot (3.8km) easily puts the Deben Estuary SPA within the orbit of the proposed LDF Core Strategy site at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption. "The allocation east of Ipswich around Martlesham could be close to the Deben Estuary SPA" (Ä§5.6.7). The allocation east of Ipswich around Martlesham is close to the Deben Estuary SPA - it is 1.8km away (as the crow flies). The use of the term 'could be' is disingenuous - it implies there is some leeway in where the housing goes, which isn't the case. The LDF Core Strategy specifies 'To the south and east of Adastral Park' which can only mean one thing - BT's land (see BT's planning application C09/0555).

"The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings" (Ä§5.8.5). Whilst this is factually correct, its significance is questionable, as the Deben Estuary Survey did not cover the winter period, it simply asked interviewees if they also visited in the winter. "The Deben Estuary visitor survey... does not have the data or analysis to predict changes in visitor numbers" (Ä§5.8.8). This is partly true, a more comprehensive survey carried out by professionals would be needed for that. The survey says: "We hope that the data we have collected is helpful in providing some baseline information from which further studies can be conducted or more realistic projections made regarding increased visitor numbers resulting from the Adastral Park, Martlesham development and the consequent impact on the wildlife." (Deben Estuary visitor survey, Ä§1.9). The point is that the Appropriate Assessment makes predictions of increases to visitor numbers without any data on current visitor numbers, so although the Deben Estuary visitor survey isn't scientifically rigorous, it is better than nothing.

Ä§6.2 Policy SP2. Housing numbers

Point 6. Summary:
The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The conclusion that it is unlikely that many visitors would walk from their homes to the Deben Estuary SPA at Martlesham, and that it is expected there will be no new high levels of disturbance, are based on the flawed assumption that people won't walk more than 1km and an unrealistic reliance on greenspace provision.

"... the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk" There is nothing wrong with the estuary-side path, it is perfectly walkable for about 2.5km up to the breach opposite Methersgate Quay. We agree with most of Ä§6.2.28, although the location of the proposed housing is known precisely - it is 'To the south and east of Adastral Park' see comments on Ä§5.6.7, above. We agree with the conclusion in Ä§6.2.30: "It therefore cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA near Martlesham". However, this is then contradicted in Ä§6.2.31: "Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the greenspace provision is adequate, it is unlikely that many visitors would walk from their home to the estuary, so this recreational activity would not substantially increase on the foreshore of Deben Estuary SPA at Martlesham, and there is expected to be no new high levels of disturbance...". The assumption that people won't walk more than 1km is invalid (see our comments on Ä§5.6 above), and the reliance on greenspace provision is equally flawed (even if the greenspace appears in time, which is doubtful) - see our comments on Ä§7, below. The Deben Estuary Survey showed that 32% of visitors on foot walked more than 3km to the Deben Estuary at Martlesham (Deben Estuary Survey, Ä§2.19).

"It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2 - 2.5km from the Martlesham church car park (The Deben Estuary Visitor Survey by NANT of July 2011 gives 2.5km). " (Ä§6.2.34) It depends on whether this distance is 'as the crow flies' or by the shortest road route. The Deben Estuary Survey actually states them as 1.6km and 3.0km respectively (Deben Estuary Survey, Ä§3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.2km.

Point 7. Summary:
The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren't necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as 'lost due to erosion' is grossly misleading. These paths are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

"This limit to parking suggests that there is limited availability for an increase in visitors arriving by car to Waldringfield...". "Given the limit to available parking the increase in visitors walking along the estuary might be less than that predicted." (Ä§6.2.35) Obviously the parking space is 'limited', i.e. it isn't 'infinite! In fact there is space for about 75 cars in the public parking area and about 22 in the patrons only area. However, too much emphasis has been placed on the "limit to available parking" - this only applies at peak times, most of the year there is plenty of space. A letter to the Chair of Waldringfield PC from the manager of the Maybush, dated 16/2/10 says: "... the car park, generally, is not at capacity at any other time than school holidays, bank holidays and weekends. It is however often at capacity during these times out of our hours i.e. before 11am if the weather is fine and/or there is an event on at the sailing club." When the car park is full visitors aren't necessarily deterred - it is common for visitors to park in Cliff Road, and recently in Church Field Car Park, causing extra congestion (Cliff Road is narrow and single lane in places)."
estuary at Waldringfield (The Deben Estuary Visitor Survey by NANT of July 2011 gives 3km).” (§6.2.35) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 2.0km and 2.5km respectively (Deben Estuary Survey, §3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.1km. "Estuary-side footpaths north and south of Waldringfield are eroded and impassable, according to data received from Suffolk County Council in August 2011 (see Figure 03). This limits the walking routes available from Waldringfield." (§6.2.36). Figure 03 shows the footpath extending about 1km north of Manor House and about 1.5km south of the reservoir as ‘Section lost due to erosion’. This is completely untrue and is grossly misleading. In fact the path north of Waldringfield is breached opposite Metheradge Quay about 2/3 of the way along the section shown as ‘lost’, and the path south of Waldringfield is breached just beyond Early Creek, at the southern end the section shown as ‘lost’. In places these paths can get muddy in poor weather, but otherwise are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

Point 8, Summary: The conclusion that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA is based on the invalid assumption that people won’t walk more than 1km, and the unrealistic reliance on greenspace provision. "It can be ascertained that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA, given a location well over 1km from the estuary and with adequate greenspace provision." (§6.2.42). This is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on §5.6), and the unrealistic reliance on greenspace provision - see our comments on §7.

"It is therefore concluded that there would be no adverse affect upon the integrity of the respective European sites." (§6.2.45). Again, this is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on §5.6), and the unrealistic reliance on greenspace provision - see our comments on §7.

Point 9, Summary: No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment. No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is important because: "On one estuarine site, disturbance to birds from boats was thought to be the biggest problem” (§5.7.6). Motor boats and jet skis, which create a large wake, also contribute to erosion of the river banks, endangering the delicate saltmarsh ecosystem. This is a serious omission from the Appropriate Assessment.

Point 10, Summary: The Appropriate Assessment places great reliance on the creation of a new country park as mitigation. This is despite the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Even if a site is found it will not have any of the attractive features of the Deben Estuary, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

The Appropriate Assessment places great reliance on the creation of a new country park, which it claims will provide mitigation by diverting visitors (and particularly dog walkers) away from the Deben Estuary. No specific site is suggested, although a location vaguely described as “to the north or north-east of Ipswich” is proposed (¶7.2.10). However, no mention is made of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

Various wish-lists of desirable features of this mitigating greenspace are presented throughout ¶7.2. However, the ones that could actually attract visitors away from the Deben Estuary are conspicuous by their absence. Most people who visit the Deben Estuary do so because of the river. They walk along its banks, their children play on the beach and swim in the river, they sail, fish, birdwatch and engage in many river-based activities, and of course the Maybush at Waldringfield attracts people from far and wide. A country park will not have any of these attractive features, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

There isn’t an abundance of suitable sites “to the north or north-east of Ipswich”. The phrase “to the north or north-east of Ipswich” suggests that it is likely that the site will be west of the A12, and if this is the case then the Deben Estuary will be far more accessible to the residents of the proposed Astraal Park development than the mitigation site, as the A12 presents a significant barrier to walkers.

Following the dubious logic of the Appropriate Assessment, if the mitigating greenspace is more than 1km from the development, visitors are unlikely to walk there. A circle of radius 1km from Astraal Park barely reaches beyond Martlesham Heath to the west or Tesco’s car park to the north, an area that contains no significant candidate spaces, so it is difficult to see where this greenspace could come from. Unless, that is, people are expected to drive to the mitigation site, in which case it won’t have any effect on visitors going to the Deben Estuary on foot, but will increase traffic congestion west of the A12.

Recent evidence from Dorset casts serious doubt on the effectiveness of alternative greenspace in mitigating against increases in visitors to environmentally sensitive sites: “Almost all responding households had some ‘Other’ greenspace within 1.5km. The presence of this ‘Other’ greenspace had no apparent effect on reducing either the likelihood or frequency of visiting heaths.... Some of the results suggest that people with more greenspace surrounding their homes may actually visit heaths more.... The most critical conclusion is that there appears to be only a slender relationship between the amount of (existing) alternative greenspace nearby and the amount of heathland visits” (East Dorset District Council Public Report - Household Survey, Footprint Ecology, May 2009, p27).

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No change has been made to the conclusions on mitigation (§7.4): "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This of course depends on the mitigation being implemented and available at the start of house building. However, even if it is, it is highly unlikely that "the impacts of additional housing provisions in Policy SP2 and related policies ... will be reduced to an insignificant level" (§7.4.1). Where is the evidence that this (as yet hypothetical) mitigation will reduce the 'adverse effect' to an 'insignificant level'? The current number of visitors to the European sites isn't even known, and the increase isn't known either, so how can it be said with confidence that this increase will be eradicated with appropriate mitigation? It is pure speculation, without any basis in fact.

§8 Conclusions

Point 11, Summary:
Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

"It is concluded that policy SP2 would have an adverse effect upon the integrity of a number of European sites, alone and in combination with the Ipswich Borough Core Strategy and Policies." (§8.6.1). This we do agree with.

"Mitigation is proposed which, if implemented, would reduce the adverse effect to an insignificant level and would enable a conclusion that it can be ascertained that there will be no adverse effect upon the integrity of any European site." (§8.6.1). As explained above, given that no sites or funding have been found, mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. We believe there is no justification for this optimism, and that it is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

§9.2 Further work needed

Point 12, Summary:
It is claimed that further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. Yet it is acknowledged that the data upon which major decisions have been based is poor. No attempt will be made to get better data before the decisions are formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions. This is not how decision making is supposed to work.

"Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected." (§9.1.1). This decision was made in 2009. If SCDC had instead decided to commission a proper visitor survey at that time, it would probably be complete by now (2 years later), and could have provided a far more reliable basis for assessing the impact of the housing proposed in the Ipswich Borough and Suffolk Coastal Core Strategies.

Having acknowledged that the data is poor, the Appropriate Assessment makes the highly dubious claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." (§9.2.3) So a major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions.

Summary:
The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The conclusion that it is unlikely that many visitors would walk from their homes to the Deben Estuary SPA at Martlesham, and that it is expected there will be no new high levels of disturbance, are based on the flawed assumption that people won't walk more than 1km and an unrealistic reliance on greenspace provision.

Change to Plan

Appear at exam?
Not Specified

Legal?
Not Specified

Sound?
Not Specified

Duty to Cooperate?
Not Specified

Soundness Tests
None

Attachments:
Full letter

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
4081  Comment
6 - Assessment of Each Policy
Impact on the suite of European Sites in the wider area

Respondent: Waldringfield Parish Council (Mrs Jean Potter)  Agent: N/A

Full Text: 

Å§5 Methods of assessing European site visitor increases from an increased human population

Point 1, Summary:
There is no up to date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites of concern to the Appropriate Assessment. Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"There is a limited amount of data regarding the quantity of visitors to European sites" (Å§5.1.10) Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available, and can be used to predict increases in visitor numbers from new housing." (Å§5.1.10). This survey covers the AONB as a whole. It makes no mention of the Deben Estuary SPA/SSSI/RAMSAR Site. Neither does it mention the other SSSIs near to Adastral Park (Newbourne Springs, Ipswich Heaths and Sinks Valley, Kesgrave), because they are not in the AONB.

The only interview locations on the River Deben are at Melton and Bawdsey, which are irrelevant to the proposed housing at Adastral Park and Felixstowe. All the interviews were conducted in August, not in spring, autumn or winter. These facts make the AONB 2004 survey completely irrelevant to any prediction of increases in visitor numbers from new housing. In particular, the phrase "can be used to predict increases in visitor numbers from new housing" refers to visitors to the European Sites potentially affected, as listed in Å§2.1.2. In Å§2 (European sites potentially affected) it makes no mention of the AONB.

Throughout Å§5.3 (Calculations to predict additional visitors to European sites across the Suffolk Coast and Heaths AONB using Tourist Board data) the distinction between the AONB and the European Sites is regularly confused. For example:

* in Å§5.3.5 it says: "Many of the sites in the AONB involved in the visitor study were European sites, so the study is relevant to this Appropriate Assessment." The AONB (2004) study makes no mention of (and certainly does not "involve") any environmentally designated sites, European or otherwise.

* In Å§5.3.21 it says: "... roughly one-quarter of all visits to the AONB originate from Ipswich Borough and Suffolk Coastal District. This assumption is also applied to the European sites within the AONB." On what basis is this assumption also applied to European sites within the AONB?

* In Å§5.3.18 it says: "Table 6 shows that the increase in visitors to the Suffolk Coast and Heaths AONB, as a result of the proposed developments is predicted to be 2.83%." In Å§5.3.25 it says: "To allow for these assumptions, the approximate 2.83% increase in total visitors to the AONB is given as a range of 2% - 5%." (our emphasis). Both of these refer to the AONB, not any European Site or Sites. But then in Å§5.3.26 it says: "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% ..." No justification is given for jumping from a conclusion about visitors to the AONB to one about visitors to European Sites.

Not only is there a confusion between the AONB and European Sites within the AONB, but no attempt is made in Å§5.3 to distinguish between individual European Sites. For example, the Deben Estuary SPA is obviously more likely to receive a greater increase in visitors due the proposed housing at Adastral Park than more northerly sites such as the Minsmere-Walberswick SPA, but this is not mentioned. (The discussion of the South Sandlings Survey in Å§5.5 rectifies this for the European Sites within the survey area, but of course this does not cover the Deben Estuary, and it does not clarify the confusions in Å§5.3.)

Point 2, Summary:
The estimate of the net increase in people for the East Ipswich Plan Area, based as it is on 1.57 new people per dwelling, is a serious under-estimate. The figure of 1.57 comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. It contains the absurd hidden assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding. There is no evidence that there is any overcrowding in these villages.

In Å§5.3.7 to Å§5.13, and particularly in Table 3, an attempt is made to estimate the increase in population due to the proposed housing. To do this it uses the 'number of new people per new dwelling', which in Suffolk Coastal is supposed to be 1.57. This is more realistic than the previous figure of 0.9, but is still seriously flawed. It comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. According to the Oxford Economics Study the occupancy rate in the East was 2.31 (in 2009) decreasing to 2.22 (in 2027), giving an average of 2.27. (p34)

In Å§5.3.9 the figure of 1.57 is explained: "This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy." It is extremely unlikely that any of the 2,000 dwellings proposed for Adastral Park will be bought for holiday homes, so the difference between the 4,540 (2,000x2.27) new occupants and the 3,140 (2,000x1.57) new people to the area must be accounted for by assuming that 1,400 (4,540-3,140) people will move to Adastral Park because of the fragmentation of multiple person households in the area, and so will not be adding to the number of extra people living near the Deben Estuary. This dubious assumption is not explained or even mentioned, let alone properly justified. It is in fact totally implausible: In order for an occupant of the new housing at Adastral Park not to count as a 'new' additional person, he/she must:..."
1. move to Adastral Park from somewhere at least equally near the Deben Estuary (approximately)
2. move out of a multiple person household into one with the same or lower occupancy at Adastral Park
3. not be replaced by anyone moving into the area from further afield
4. not be part of a house-moving chain involving anyone moving into the area from further afield

The only places that qualify for inclusion in (1) are: Waldringfield, Newbourne, Hemley, Brightwell, Martlesham Village and Martlesham Heath (just). Kesgrave and Grange Farm are roughly twice the distance from the Deben Estuary so can be excluded, and Woodbridge can be excluded because although it is on the River Deben, it is not on a sensitive part: "the Deben Estuary is not assessed by Natural England as being unfavourable due to human disturbance" (§A6.2.35). The combined populations of these 6 villages is 6,630, so the Appropriate Assessment contains the absurd hidden assumption that 1,400 (21%) of the residents of these villages will move to Adastral Park because of pressures of overcrowding. There is no evidence that there is any overcrowding in these areas, or that there is any desire for the residents to move to the proposed housing at Adastral Park - the idea is quite ludicrous.

The upshot of this is that the figure of 3,462 for the 'Estimated net increase in people' for the East Ipswich Plan Area, (Table 3), based as it is on 1.57 new people per dwelling, is a serious under-estimate. It is far more likely that the entire population of the 2,000 new houses at Adastral Park will come from outside the immediate area, and will be about 4,540 (2,000 x 2.27). The same critique can be applied to the Felixstowe, Walton and the Trimleys figure of 2,763 (Table 3).

Point 3, Summary:
The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing an upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.

The actual increase in the number of people visiting the sites is not given, because the current number of visitors is unknown (because of the lack of a proper survey - see above).

The assumptions given in §A5.3.14 are all highly dubious (except one):
* "the pattern of day visits to sites by the new residents is similar to that of the existing population" This is very unlikely.
* The proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries.
* "the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey" It is not clear if 'sites' is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.
* "an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity" OK, this is an acceptable assumption.
* "the relative proportions of day visitors and overnight visitors does not change" Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase.
* "the summer snapshot survey is typical of visitors all year round." This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to - be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

Table 4 (A§5.3.13), second column reads 'Estimated increase in people (table 2)'. The data is actually taken from Table 3.

Table 5 (A§5.3.16), second column reads 'proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1'. The data is actually taken from Table 2.

The calculations in Table 5 and described in A§5.3.15 are an attempt to predict the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as stated in the title of Table 6. However, in several places the restriction (in bold above) is not made clear, for example in A§5.3.14-16. This gives the impression that it predicts the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from all potential sources. 50.5% of the total day visitors to the AONB come from outside Suffolk Coastal and Ipswich Borough/Pine wood. Increases in the populations in the areas these people come from have been excluded from the calculations. This is unrealistic - Babergh, Tendring, Waveney and all the other nearby districts all have LDF Core Strategies that propose large housing allocations and correspondingly large increases in populations. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as described in A§5.3.15 and shown in Table 5, is logically flawed. Column A only includes day visitors who live in Suffolk Coastal and Ipswich Borough/Pine wood. In Column B this is multiplied by the proportion of visitors who are day visitors (55%). However, the figure of 55% applies to visitors from all locations, not just those from Suffolk Coastal and Ipswich Borough/Pine wood. Common sense tells us that local visitors are more likely to be on day trips than those coming from further afield, and this is confirmed by comparing Map3 (g11) with Map 4 (g12) in the Suffolk Coast and Heaths AONB Survey (2004). It is therefore reasonable to assume that a far larger value than 55% should be used as the multiplier in Column B (the data shown in the Suffolk Coast and Heaths AONB Survey (2004) isn't sufficiently detailed to tell us what the value should be.). In fact it would be much more realistic to have different multipliers for the different areas - for example we know that about 95% of visitors to Martlesham are on day trips (Suffolk Coast and Heaths AONB Survey (2004) Chart 3), so if most of these came from
the East Ipswich Plan Area we could use 95% as the multiplier in Column B, 2nd row.

Two of the three assumptions given in Å§5.3.23 are highly dubious:

* "New' people in the Borough / District will have the same visiting pattern as 'existing' people" This is very unlikely - see comments on Å§5.3.14, first bullet point

* "Visits by holiday makers will not be affected by any increased use by local visitors" It is possible that overcrowding at popular sites will put off holidaymakers. Holiday makers generally want to visit unspoiled countryside; the urbanisation resulting from the housing allocations, particularly at Adastral Park, is very likely to deter holidaymakers.

* "Sites, including their car parks, will not constrain the number of visits by becoming 'full' and turning away visitors" OK, this is an acceptable assumption.

The uncertainties in the calculations are acknowledged by the vagueness of the conclusion (Å§5.3.26): "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% as a result ... " It would also be reasonable to assume that the increase is far higher than 5%. What justification is there for choosing 5% as the upper limit rather than, say, 10%? The flaws in the methodology, the likelihood that the assumptions in Å§5.3.14 and Å§5.3.23 are invalid, and the inappropriateness of using the Suffolk Coast and Heaths AONB Survey (2004) results in the first place all combine to make this conclusion completely worthless.

Point 4, Summary:
The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the proposed new housing in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area than the average across the AONB. One would expect the increase in the Orwell and Deben Estuary SPAs to be far greater than the 8.8% estimated for the South Sandlings area. Nowhere is this obvious conclusion stated.

Another reason the figure of 2-5% is worthless is that it is an average across the whole of the AONB. 77% of the proposed new housing is in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area, all of which are far closer to the Orwell and Deben Estuaries than the other European Sites in the AONB, and these sites will therefore receive a far greater increase in visitors than the average across the whole of the AONB. Even if the figure of 2-5% is correct it tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs. This point is made in Å§5.8.1 with regard to the South Sandlings area "Fewer people living in or east of Ipswich might visit distant parts of the AONB compared to the South Sandlings, thus having a smaller impact over the AONB", but unfortunately the obvious extension of this argument to the Deben and Orwell Estuaries hasn't been made.

"It is a reasonable assumption that an increase in dwellings would generate a proportionate increase in visitors from any particular distance band. For example, if the number of houses doubled in a particular distance band the number of visitors from that area would also double" (Å§5.5.6). We agree with this. It is a pity that this logic can't also be applied to the impact on the Deben Estuary of the 2,000 houses proposed for Adastral Park. The calculation method described in Å§5.5.9 and Å§5.5.10 seems to be far more realistic than those used in Å§5.3 (criticised above), and there seems to be no good reason why it couldn't also be applied the Adastral Park - Deben Estuary situation if basic data on visitor numbers were known.

"The distribution of proposed housing is not precisely specified within the Core Strategies." (Å§5.5.7) This is not entirely true. One of our main complaints about the SCDC LDF Core Strategy is that it is very site-specific. 2,000 houses 'to the south and east of Adastral Park' could hardly be more site-specific.

In Å§5.5.12 the increase in the number of visitors to the South Sandlings area as a result of the Ipswich and Suffolk Coastal Core Strategies is predicted to be 8.8% (broadened to 6-12% in Å§5.5.14). Most of the housing proposed in these Core Strategies is far nearer to the Deben Estuary than it is to the South Sandlings area, so one would expect the increase in the number of visitors to the former to be far greater than 8.8%. Nowhere is this obvious conclusion stated. (No estimate is given for the increase in the number of visitors to the Deben Estuary as a result of the Ipswich and Suffolk Coastal Core Strategies, which is a pity as this is the SPA most affected by the extra housing.)

Point 5, Summary:
The claim that people are unlikely to walk further than 1km is absurd. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.

Throughout Å§5.6 various references are made to the ridiculous claims that people are unlikely to walk further than 1km or drive further than 8km. For example: "...only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur..." (Å§6.6.6). These are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed. The 1km figure is invalid because:

1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked less than 1km was that they lived less than 1km from the site, so didn't need to walk further.
3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub
4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

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The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far beyond that distance to reach an attractive area like the River Deben. The inappropriate use of the 1km figure is borne out by the Deben Estuary Survey, which shows that 57.1% (far more than the 11% in Dorset) of visitors travel more than 1km (Deben Estuary Survey, §6.2.19). The average distance walked by people on foot (3.8km) easily puts the Deben Estuary SPA within the orbit of the proposed LDF Core Strategy site at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption. "The allocation east of Ipswich around Martlesham could be close to the Deben Estuary SPA" (Å6.6.7). The allocation east of Ipswich around Martlesham is close to the Deben Estuary SPA - it is 1.8km away (as the crow flies). The use of the term ‘could be’ is disingenuous - it implies there is some leeway in where the housing goes, which isn't the case. The LDF Core Strategy specifies 'To the south and east of Adastral Park' which can only mean one thing - BT's land (see BT's planning application C00/055).

"The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings" (Å6.5.8.5). Whilst this is factually correct, its significance is questionable, as the Deben Estuary Survey did not cover the winter period, it simply asked interviewees if they also visited in the winter. "The Deben Estuary visitor survey ... does not have the data or analysis to predict changes in visitor numbers" (Å6.5.8.8). This is partly true, a more comprehensive survey carried out by professionals would be needed for that. The survey says: "We hope that the data we have collected is helpful in providing some baseline information from which further studies can be conducted or more realistic projections made regarding increased visitor numbers resulting from the Adastral Park, Martlesham development and the consequent impact on the wildlife." (Deben Estuary visitor survey, §1.9). The point is that the Appropriate Assessment makes predictions of increases to visitor numbers without any data on current visitor numbers, so although the Deben Estuary visitor survey isn't scientifically rigorous, it is better than nothing.

Å6.2 Policy SP2. Housing numbers

Point 6. Summary:
The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The conclusion that it is unlikely that many visitors would walk from their homes to the Deben Estuary SPA at Martlesham, and that it is expected there will be no new high levels of disturbance, are based on the flawed assumption that people won't walk more than 1km and an unrealistic reliance on greenspace provision.

"... the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk. There is nothing wrong with the estuary-side path, it is perfectly walkable for about 2.5km up to the breach opposite Methersgate Quay. We agree with most of Å6.2.28, although the location of the proposed housing is known precisely - it is 'To the south and east of Adastral Park' see comments on Å5.6.7, above.

We agree with the conclusion in Å6.2.30: "It therefore cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA near Martlesham". However, this is then contradicted in Å6.2.31: "Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the greenspace provision is adequate, it is unlikely that many visitors would walk from their home to the estuary, so this recreational activity would not substantially increase on the foreshore of Deben Estuary SPA at Martlesham, and there is expected to be no new high levels of disturbance ...". The assumption that people won't walk more than 1km is invalid (see our comments on Å6.6.6 above), and the reliance on greenspace provision is equally flawed (even if the greenspace appears in time, which is doubtful) - see our comments on Å7, below. The Deben Estuary Survey showed that 32% of visitors on foot walked more than 3km to the Deben Estuary at Martlesham (Deben Estuary Survey, Å2.19).

"It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2 - 2.5km from the Martlesham church car park (The Deben Estuary Visitor Survey by NANT of July 2011 gives 2.5km). " (Å6.2.34) It depends on whether this distance is 'as the crow flies' or by the shortest road route. The Deben Estuary Survey actually states them as 1.6km and 3.0km respectively (Deben Estuary Survey, Å3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.2km.

Point 7. Summary:
The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren't necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as 'lost due to erosion' is grossly misleading. These paths are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

"This limit to parking suggests that there is limited availability for an increase in visitors arriving by car to Waldringfield."... "Given the limit to available parking the increase in visitors walking along the estuary might be less than that predicted." (Å6.2.35) Obviously the parking space is 'limited', i.e. it isn't infinite! In fact there is space for about 75 cars in the public parking area and about 22 in the patrons only area. However, too much emphasis has been placed on the "limit to available parking" - this only applies at peak times, most of the year there is plenty of space. A letter to the Chair of Waldringfield PC from the manager of the Maybush, dated 16/2/10 says: "... the car park, generally, is not at capacity at any other time than school holidays, bank holidays and weekends. It is however often at capacity during these times out of our hours i.e. before 11am if the weather is fine and/or there is an event on at the sailing club." When the car park is full visitors aren't necessarily deterred - it is common for visitors to park in Cliff Road, and recently in Church Field Car Park, causing extra congestion (Cliff Road is narrow and single lane in places).

"It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2.5 - 3km from the Deben
estuary at Waldringfield (The Deben Estuary Visitor Survey by NANT of July 2011 gives 3km)." (§6.2.35) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 2.0km and 2.5km respectively (Deben Estuary Survey, §3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.1km.

"Estuary-side footpaths north and south of Waldringfield are eroded and impassable, according to data received from Suffolk County Council in August 2011 (see Figure 03). This limits the walking routes available from Waldringfield." (§6.2.36). Figure 03 shows the footpath extending about 1km north of Manor House and about 1.5km south of the reservoir as ‘Section lost due to erosion’. This is completely untrue and is grossly misleading. In fact the path north of Waldringfield is breached opposite Metersgate Quay about 2/3 of the way along the section shown as ‘lost’, and the path south of Waldringfield is breached just beyond Early Creek, at the southern end the section shown as ‘lost’. In places these paths can get muddy in poor weather, but otherwise are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

Point 8, Summary:
The conclusion that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA is based on the invalid assumption that people won't walk more than 1km, and the unrealistic reliance on greenspace provision.

"It can be ascertained that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA, given a location well over 1km from the estuary and with adequate greenspace provision." (§6.2.42). This is based on the invalid assumption that people won't walk more than 1km (see our earlier comments on §5.6), and the unrealistic reliance on greenspace provision - see our comments on §7.

"It is therefore concluded that there would be no adverse affect upon the integrity of the respective European sites." (§6.2.45). Again, this is based on the invalid assumption that people won't walk more than 1km (see our earlier comments on §5.6), and the unrealistic reliance on greenspace provision - see our comments on §7.

Point 9, Summary:
No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment.

No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is important because: "On one estuarine site, disturbance to birds from boats was thought to be the biggest problem" (§5.7.6). Motor boats and jet skis, which create a large wake, also contribute to erosion of the river banks, endangering the delicate saltmarsh ecosystem. This is a serious omission from the Appropriate Assessment.

Point 10, Summary:
The Appropriate Assessment places great reliance on the creation of a new country park as mitigation. This is despite the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Even if a site is found it will not have any of the attractive features of the Deben Estuary, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

The Appropriate Assessment places great reliance on the creation of a new country park, which it claims will provide mitigation by diverting visitors (and particularly dog walkers) away from the Deben Estuary. No specific site is suggested, although a location vaguely described as “to the north or north-east of Ipswich” is proposed (§7.2.10).

However, no mention is made of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

Various wish-lists of desirable features of this mitigating greenspace are presented throughout §7.2. However, the ones that could actually attract visitors away from the Deben Estuary are conspicuous by their absence. Most people who visit the Deben Estuary do so because of the river. They walk along its banks, their children play on the beach and swim in the river, they sail, fish, birdwatch and engage in many other river-based activities, and of course the Maybush at Waldringfield attracts people from far and wide. A country park will not have any of these attractive features, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

There isn’t an abundance of suitable sites “to the north or north-east of Ipswich”. The phrase “to the north or north-east of Ipswich” suggests that it is likely that the site will be west of the A12, and if this is the case then the Deben Estuary will be far more accessible to the residents of the proposed A12 development than the mitigation site, as the A12 presents a significant barrier to walkers.

Following the dubious logic of the Appropriate Assessment, if the mitigating greenspace is more than 1km from the development, visitors are unlikely to walk there. A circle of radius 1km from A12 development barely reaches beyond Martlesham Heath to the west or Tesco’s car park to the north, an area that contains no significant candidate spaces, so it is difficult to see where this greenspace could come from. Unless, that is, people are expected to drive to the mitigation site, in which case it won’t have any effect on visitors going to the Deben Estuary on foot, but will increase traffic congestion west of the A12.

Recent evidence from Dorset casts serious doubt on the effectiveness of alternative greenspace in mitigating against increases in visitors to environmentally sensitive sites: “Almost all responding households had some ‘Other’ greenspace within 1.5km. The presence of this ‘Other’ greenspace had no apparent effect on reducing either the likelihood or frequency of visiting heaths… Some of the results suggest that people with more greenspace surrounding their homes may actually visit heaths more… The most critical conclusion is that there appears to be only a slender relationship between the amount of (existing) alternative greenspace nearby and the amount of heathland visits” (East Dorset District Council Public Report - Household Survey, Footprint Ecology, May 2009, p27).

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No change has been made to the conclusions on mitigation (§7.4): “It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site.” This of course depends on the mitigation being implemented and available at the start of house building. However, even if it is, it is highly unlikely that “the impacts of additional housing provisions in Policy SP2 and related policies ... will be reduced to an insignificant level” (§7.4.1). Where is the evidence that this (as yet hypothetical) mitigation will reduce the ‘adverse effect’ to an ‘insignificant level’? The current number of visitors to the European sites isn’t even known, and the increase isn’t known either, so how can it be said with confidence that this increase will be eradicated with appropriate mitigation? It is pure speculation, without any basis in fact.

§8 Conclusions

Point 11, Summary: Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

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§9.2 Further work needed

Point 12, Summary: It is claimed that further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. Yet it is acknowledged that the data upon which major decisions have been based is poor. No attempt will be made to get better data before the decisions are formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions. This is not how decision making is supposed to work.

“Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected.” (§9.1.1). This decision was made in 2009. If SCDC had instead decided to commission a proper visitor survey at that time, it would probably be complete by now (2 years later), and could have provided a far more reliable basis for assessing the impact of the housing proposed in the Ipswich Borough and Suffolk Coastal Core Strategies.

Having acknowledged that the data is poor, the Appropriate Assessment makes the highly dubious claim that: “further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress.” (§9.2.3) So a major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment’s conclusions.

Summary: The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren’t necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as 'lost due to erosion' is grossly misleading. These paths are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

Change to Plan

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Attachments: Full letter

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In order for an occupant of the new housing at Adastral Park not to count as a 'new' additional person, he/she must:

Assumption is not explained or even mentioned, let alone properly justified. It is in fact totally implausible:

- That 1,400 (4,540-3,140) people will move to Adastral Park because of the fragmentation of multiple person households (2,000x2.27) new occupants and the 3,140 (2,000x1.57) new people to the area must be accounted for by assuming the 2,000 dwellings proposed for Adastral Park will be bought for holiday homes, so the difference between the 4,540 some multiple person households already living in the area will fragment and disperse into the new dwellings, or some...

According to the Oxford Economics Study the occupancy rate in the East was 2.31 (in 2009) decreasing to 2.22 (in 2011). The occupancy rate of new dwellings, as explained in §5.3.9, is supposed to be 1.57. This is more realistic than the previous figure of 0.9, but is still seriously flawed. It comes from the Oxford Economics Study, which SCDC referred to the AONB and how these affect wildlife.

Not only is there a confusion between the AONB and the European Sites within the AONB, but no attempt is made in §5.3 to distinguish between individual European Sites. For example, the Deben Estuary SPA is obviously more likely to receive a greater increase in visitors due to the proposed housing at Adastral Park than more northerly sites such as the Minsmere-Walberswick SPA, but this is not mentioned. (The discussion of the South Sandlings Survey in §5.5 rectifies this for the European Sites within the survey area, but of course this does not cover the Deben Estuary, and it does not clarify the confusions in §5.3.)

The Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. It contains the absurd hidden assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding. There is no evidence that there is any overcrowding in these villages.

In §5.3.7 to §5.3.13, and particularly in Table 3, an attempt is made to estimate the increase in population due to the proposed housing. To do this it uses the 'number of new people per new dwelling', which in Suffolk Coastal is supposed to be 1.57. This is more realistic than the previous figure of 0.9, but is still seriously flawed. It comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. According to the Oxford Economics Study the occupancy rate in the East was 2.31 (in 2009) decreasing to 2.22 (in 2021), giving an average of 2.27. (p34).

In §5.3.9 the figure of 1.57 is explained: "This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy." It is extremely unlikely that any of the 2,000 dwellings proposed for Adastral Park will be bought for holiday homes, so the difference between the 4,540 (2,000x2.27) new occupants and the 3,140 (2,000x1.57) new people to the area must be accounted for by assuming that 1,400 (4,540-3,140) people will move to Adastral Park because of the fragmentation of multiple person households in the area, and so will not be adding to the number of extra people living near the Deben Estuary. This dubious assumption is not explained or even mentioned, let alone properly justified. It is in fact totally implausible: In order for an occupant of the new housing at Adastral Park not to count as a 'new' additional person, he/she must:
1. move to Adastral Park from somewhere at least equally near the Deben Estuary (approximately)
2. move out of a multiple person household into one with the same or lower occupancy at Adastral Park
3. not be replaced by anyone moving into the area from further afield
4. not be part of a house-moving chain involving anyone moving into the area from further afield

The only places that qualify for inclusion in (1) are: Waldringfield, Newbourne, Henley, Brightwell, Martlesham Village and Martlesham Heath (just). Kesgrave and Grange Park are roughly twice the distance from the Deben Estuary so can be excluded, and Woodbridge can be excluded because although it is on the River Deben, it is not on a sensitive part: “the Deben Estuary is not assessed by Natural England as being unfavourable due to human disturbance” (Å§6.2.35). The combined populations of these 6 villages is 6,630, so the Appropriate Assessment contains the absurd hidden assumption that 1,400 (21%) of the residents of these villages will move to Adastral Park because of pressures of overcrowding. There is no evidence that there is any overcrowding in these areas, or that there is any desire for the residents to move to the proposed housing at Adastral Park - the idea is quite ludicrous.

The upshot of this is that the figure of 3,462 for the ‘Estimated net increase in people’ for the East Ipswich Plan Area, (Table 3), based as it is on 1.57 new people per dwelling, is a serious underestimate. It is far more likely that the entire population of the 2,000 new houses at Adastral Park will come from outside the immediate area, and will be about 4,540 (2,000x2.27).

The same criticism can be applied to the Felixstowe, Walton and the Trimleys figure of 2,763 (Table 3).

Point 3, Summary:
The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing the upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.

The actual increase in the number of people visiting the sites is not given, because the current number of visitors is unknown (because of the lack of a proper survey - see above).

The assumptions given in Å§5.3.14 are all highly dubious (except one):

1. "the pattern of day visits to sites by the new residents is similar to that of the existing population" This is very unlikely.
2. The proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries.
3. "the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey" It is not clear if ‘sites’ is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.
4. "an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity" OK, this is an acceptable assumption.
5. "the relative proportions of day visitors and overnight visitors does not change" Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase.
6. "the summer snapshot survey is typical of visitors all year round." This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

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1. "the pattern of day visits to sites by the new residents is similar to that of the existing population" This is very unlikely.
2. The proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries.
3. "the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey" It is not clear if ‘sites’ is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.
4. "an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity" OK, this is an acceptable assumption.
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6. "the summer snapshot survey is typical of visitors all year round." This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

Table 4 (Å§5.3.13), second column reads ‘Estimated increase in people (table 2)’. The data is actually taken from Table 3.

Table 5 (Å§5.3.16), second column reads ‘proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1’. The data is actually taken from Table 2.

The calculations in Table 5 and described in Å§5.3.15 are an attempt to predict the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as stated in the title of Table 6. However, in several places the restriction (in bold above) is not made clear, for example in Å§5.3.14-16. This gives the impression that it predicts the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from all potential sources. 50.5% of the total day visitors to the AONB come from outside Suffolk Coastal and Ipswich Borough/Pinewood. Increases in the populations in the areas these people come from have been excluded from the calculations. This is unrealistic - Babergh, Tendring, Waveney and all the other nearby districts all have LDF Core Strategies that propose large housing allocations and correspondingly large increases in populations.

The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as described in Å§5.3.15 and shown in Table 5, is logically flawed. Column A only includes day visitors who live in Suffolk Coastal and Ipswich Borough/Pinewood. In Column B this is multiplied by the proportion of visitors who are day visitors (55%). However, the figure of 55% applies to visitors from all locations, not just those from Suffolk Coastal and Ipswich Borough/Pinewood. Common sense tells us that local visitors are more likely to be on day trips than those coming from further afield, and this is confirmed by comparing Map3 (p11) with Map 4 (p12) in the Suffolk Coast and Heaths AONB Survey (2004). It is therefore reasonable to assume that a far larger value than 55% should be used as the multiplier in Column B (the data shown in the Suffolk Coast and Heaths AONB Survey (2004) isn’t sufficiently detailed to tell us what the value should be.). In fact it would be much more realistic to have different multipliers for the different areas - for example we know that about 95% of visitors to Martlesham are on day trips (Suffolk Coast and Heaths AONB Survey (2004) Chart 3), so if most of these came from
the East Ipswich Plan Area we could use 95% as the multiplier in Column B, 2nd row.

Two of the three assumptions given in Â§5.3.23 are highly dubious:
* "New' people in the Borough / District will have the same visiting pattern as 'existing' people" This is very unlikely - see comments on Â§5.3.14, first bullet point
* "Visits by holiday makers will not be affected by any increased use by local visitors" It is possible that overcrowding at popular sites will put off holidaymakers. Holiday makers generally want to visit unspoiled countryside; the urbanisation resulting from the housing allocations, particularly at Adastral Park, is very likely to deter holidaymakers.
* "Sites, including their car parks, will not constrain the number of visits by becoming 'full' and turning away visitors" OK, this is an acceptable assumption.

The uncertainties in the calculations are acknowledged by the vagueness of the conclusion (Â§5.3.26): "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% as a result ... " It would also be reasonable to assume that the increase is far higher than 5%. What justification is there for choosing 5% as the upper limit rather than, say, 10%? The flaws in the methodology, the likelihood that the assumptions in Â§5.3.14 and Â§5.3.23 are invalid, and the inappropriateness of using the Suffolk Coast and Heaths AONB Survey (2004) results in the first place all combine to make this conclusion completely worthless.

Point 4, Summary:
The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the proposed new housing in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area than the average across the AONB. One would expect the increase in the number of visitors to the Orwell and Deben Estuary SPAs to be far greater than the 2.5% estimated for the South Sandlings area. Nowhere is this obvious conclusion stated.

Another reason the figure of 2-5% is worthless is that it is an average across the whole of the AONB. 77% of the proposed new housing is in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area, all of which are far closer to the Orwell and Deben Estuaries than the other European Sites in the AONB, and these sites will therefore receive a far greater increase in visitors than the average across the whole of the AONB. Even if the figure of 2-5% is correct it tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs. This point is made in Â§5.8.1 with regard to the South Sandlings area "Fewer people living in or east of Ipswich might visit distant parts of the AONB compared to the South Sandlings, thus having a smaller impact over the AONB", but unfortunately the obvious extension of this argument to the Deben and Orwell Estuaries hasn't been made.

"It is a reasonable assumption that an increase in dwellings would generate a proportionate increase in visitors from any particular distance band. For example, if the number of houses doubled in a particular distance band the number of visitors from that area would also double" (Â§5.6). We agree with this. It is a pity that this logic can't also be applied to the impact on the Deben Estuary of the 2,000 houses proposed for Adastral Park. The calculation method described in Â§5.5.9 and Â§5.10 seems to be far more realistic than those used in Â§5.3 (criticised above), and there seems to be no good reason why it couldn't also be applied the Adastral Park - Deben Estuary situation if basic data on visitor numbers were known.

"The distribution of proposed housing is not precisely specified within the Core Strategies." (Â§5.5.7) This is not entirely true. One of our main complaints about the SCDC LDF Core Strategy is that it is very site-specific. 2,000 houses 'to the south and east of Adastral Park' could hardly be more site-specific.

In Â§5.5.12 the increase in the number of visitors to the South Sandlings area as a result of the Ipswich and Suffolk Coastal Core Strategies is predicted to be 8.8% (broadened to 6-12% in Â§5.5.14). Most of the housing proposed in these Core Strategies is far nearer to the Deben Estuary than it is to the South Sandlings area, so one would expect the increase in the number of visitors to the former to be far greater than 8.8%. Nowhere is this obvious conclusion stated. (No estimate is given for the increase in the number of visitors to the Deben Estuary as a result of the Ipswich and Suffolk Coastal Core Strategies, which is a pity as this is the SPA most affected by the extra housing.)

Point 5, Summary:
The claim that people are unlikely to walk further than 1km is absurd. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.

Throughout Â§5.6 various references are made to the ridiculous claims that people are unlikely to walk further than 1km or drive further than 8km. For example: "...only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur..." (Â§6.6). These are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed.

The 1km figure is invalid because:
1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked less than 1km was that they lived less than 1km from the site, so didn't need to walk further
3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.
The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. The inappropriateness of the 1km figure is borne out by the Deben Estuary Survey, which shows that 57.1% (far more than the 11% in Dorset) of visitors to the River Deben who arrived on foot walked more than 1km (Deben Estuary Survey, A§2.19). The average distance travelled by people on foot (3.8km) easily puts the Deben Estuary SPA within the orbit of the proposed LDF Core Strategy site at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption.

"The allocation east of Ipswich around Martlesham could be close to the Deben Estuary SPA" (A§6.7). The allocation east of Ipswich around Martlesham is close to the Deben Estuary SPA - it is 1.8km away (as the crow flies). The use of the term ‘could be’ is disingenuous - it implies there is some leeway in where the housing goes, which isn’t the case. The LDF Core Strategy specifies ‘To the south and east of Adastral Park’ which can only mean one thing - BT’s land (see BT’s planning application C09/0555).

"The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings” (A§5.8.5). Whilst this is factually correct, its significance is questionable, as the Deben Estuary Survey did not cover the winter period, it simply asked interviewees if they also visited in the winter. The Deben Estuary visitor survey … does not have the data or analysis to predict changes in visitor numbers” (A§5.8.8). This is partly true, a more comprehensive survey carried out by professionals would be needed for that. The survey says: “We hope that the data we have collected is helpful in providing some baseline information from which further studies can be conducted or more realistic projections made regarding increased visitor numbers resulting from the Adastral Park, Martlesham development and the consequent impact on the wildlife.” (Deben Estuary visitor survey, A§1.9). The point is that the Appropriate Assessment makes predictions of increases to visitor numbers without any data on current visitor numbers, so although the Deben Estuary visitor survey isn’t scientifically rigorous, it is better than nothing.

A§6.2 Policy SP2. Housing numbers

Point 6. Summary:
The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The conclusion that it is unlikely that many visitors would walk from their homes to the Deben Estuary SPA at Martlesham, and that it is expected there will be no new high levels of disturbance, are based on the flawed assumption that people won’t walk more than 1km and an unrealistic reliance on greenspace provision.

"... the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk” There is nothing wrong with the estuary-side path; it is perfectly walkable for about 2.5km up to the breach opposite Metersgate Quay.

We agree with most of A§6.2.28, although the location of the proposed housing is known precisely - it is ‘To the south and east of Adastral Park’ see comments on A§5.6.7 above.

We agree with the conclusion in A§6.2.30: "It therefore cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA near Martlesham”. However, this is then contradicted in A§6.2.31: “Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the greenspace provision is adequate, it is unlikely that many visitors would walk from their home to the estuary, so this recreational activity would not substantially increase on the foreshore of Deben Estuary SPA at Martlesham, and there is expected to be no new high levels of disturbance …". The assumption that people won’t walk more than 1km is invalid (see our comments on A§5.6 above), and the reliance on greenspace provision is equally flawed (even if the greenspace appears in time, which is doubtful) - see our comments on A§7. below. The Deben Estuary Survey showed that 32% of visitors on foot walked more than 3km to the Deben Estuary at Martlesham (Deben Estuary Survey, A§2.19).

“It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2 - 2.5km from the Martlesham church car park (The Deben Estuary Visitor Survey by NANT of July 2011 gives 2.5km).” (A§6.2.34) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 1.6km and 3.0km respectively (Deben Estuary Survey, A§3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.2km.

Point 7. Summary:
The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren’t necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as ‘lost due to erosion’ is grossly misleading. The distance by public footpaths is roughly 2.2km.

"This limit to parking suggests that there is limited availability for an increase in visitors arriving by car to Waldringfield.” "...Given the limit to available parking the increase in visitors walking along the estuary might be less than that predicted.” (A§6.2.35) Obviously the parking space is ‘limited’, i.e. it isn’t infinite! In fact there is space for about 75 cars in the public parking area and about 22 in the patrons only area. However, too much emphasis has been placed on the "limit to available parking" - this only applies at peak times, most of the year there is plenty of space. A letter to the Chair of Waldringfield PC from the manager of the Maybush, dated 16/2/10 says: “…the car park, generally, is not at capacity at any other time than school holidays, bank holidays and weekends. It is however often at capacity during these times out of our hours i.e. before 11am if the weather is fine and/or there is an event on at the sailing club.” When the car park is full visitors aren’t necessarily deterred - it is common for visitors to park in Cliff Road, and recently in Church Field Car Park, causing extra congestion (Cliff Road is narrow and single lane in places).

"It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2.5 - 3km from the Deben

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estuary at Waldringfield (The Deben Estuary Visitor Survey by NANT of July 2011 gives 3km).” (§6.2.35) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 2.0km and 2.5km respectively (Deben Estuary Survey, Â§3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.1km.

“Estuary-side footpaths north and south of Waldringfield are eroded and impassable, according to data received from Suffolk County Council in August 2011 (see Figure 03). This limits the walking routes available from Waldringfield.” (Â§6.2.36). Figure 03 shows the footpath extending about 1km north of Martlesham Heath and about 1.5km south of the reservoir as ‘Section lost due to erosion’. This is completely untrue and is grossly misleading. In fact the path north of Waldringfield is breached opposite Methersgate Quay about 2/3 of the way along the section shown as ‘lost’, and the path south of Waldringfield is breached just beyond Early Creek, at the southern end the section shown as ‘lost’. In places these paths can get muddy in poor weather, but otherwise are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

Point 8, Summary:
The conclusion that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA is based on the invalid assumption that people won’t walk more than 1km, and the unrealistic reliance on greenspace provision.

“it can be ascertained that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA, given a location well over 1km from the estuary and with adequate greenspace provision.” (Â§6.2.42). This is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on Â§5.6), and the unrealistic reliance on greenspace provision - see our comments on Â§7.

“It is therefore concluded that there would be no adverse affect upon the integrity of the respective European sites.” (Â§6.2.45). Again, this is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on Â§5.6), and the unrealistic reliance on greenspace provision - see our comments on Â§7.

Point 9, Summary:
No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment.

No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is important because: “On one estuarine site, disturbance to birds from boats was thought to be the biggest problem” (Â§5.7.6). Motor boats and jet skis, which create a large wake, also contribute to erosion of the river banks, endangering the delicate saltmarsh ecosystem. This is a serious omission from the Appropriate Assessment.

Â§7 Mitigation

Point 10, Summary:
The Appropriate Assessment places great reliance on the creation of a new country park as mitigation. This is despite the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Even if a site is found it will not have any of the attractive features of the Deben Estuary, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

The Appropriate Assessment places great reliance on the creation of a new country park, which it claims will provide mitigation by diverting visitors (and particularly dog walkers) away from the Deben Estuary. No specific site is suggested, although a location vaguely described as “to the north or north-east of Ipswich” is proposed (Â§7.2.10).

However, no mention is made of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

Various wish-lists of desirable features of this mitigating greenspace are presented throughout Â§7.2. However, the ones that could actually attract visitors away from the Deben Estuary are conspicuous by their absence. Most people who visit the Deben Estuary do so because of the river. They walk along its banks, their children play on the beach and swim in the river, they sail, fish, birdwatch and engage in many other river-based activities, and of course the Maybush at Waldringfield attracts people from far and wide. A country park will not have any of these attractive features, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

There isn’t an abundance of suitable sites “to the north or north-east of Ipswich”. The phrase “to the north or north-east of Ipswich” suggests that it is likely that the site will be west of the A12, and if this is the case then the Deben Estuary will be far more accessible to the residents of the proposed Adastral Park development than the mitigation site, as the A12 presents a significant barrier to walkers.

Following the dubious logic of the Appropriate Assessment, if the mitigating greenspace is more than 1km from the development, visitors are unlikely to walk there. A circle of radius 1km from Adastral Park barely reaches beyond Martlesham Heath to the west or Tesco’s car park to the north, an area that contains no significant candidate spaces, so it is difficult to see where this greenspace could come from. Unless, that is, people are expected to drive to the mitigation site, in which case it won’t have any effect on visitors going to the Deben Estuary on foot, but will increase traffic congestion west of the A12.

Recent evidence from Dorset casts serious doubt on the effectiveness of alternative greenspace in mitigating against increases in visitors to environmentally sensitive sites: “Almost all responding households had some ‘Other’ greenspace within 1.5km. The presence of this ‘Other’ greenspace had no apparent effect on reducing either the likelihood or frequency of visiting heaths... Some of the results suggest that people with more greenspace surrounding their homes may actually visit heaths more... The most critical conclusion is that there appears to be only a slender relationship between the amount of (existing) alternative greenspace nearby and the amount of heathland visits” (East Dorset District Council Public Report - Household Survey, Footprint Ecology, May 2009, p27).

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Appropriate Assessment for Core Strategy (August 2011)

4082 Comment

6 - Assessment of Each Policy
Impact on the suite of European Sites in the wider area

No change has been made to the conclusions on mitigation (§7.4): "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This of course depends on the mitigation being implemented and available at the start of house building. However, even if it is, it is highly unlikely that "the impacts of additional housing provisions in Policy SP2 and related policies ... will be reduced to an insignificant level" (§7.4.1). Where is the evidence that this (as yet hypothetical) mitigation will reduce the 'adverse effect' to an 'insignificant level'? The current number of visitors to the European sites isn't even known, and the increase isn't known either, so how can it be said with confidence that this increase will be eradicated with appropriate mitigation? It is pure speculation, without any basis in fact.

§8 Conclusions

Point 11, Summary:
Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

"It is concluded that policy SP2 would have an adverse effect upon the integrity of a number of European sites, alone and in combination with the Ipswich Borough Core Strategy and Policies." (§8.6.1). This we do agree with. "Mitigation is proposed which, if implemented, would reduce the adverse effect to an insignificant level and would enable a conclusion that it can be ascertained that there will be no adverse effect upon the integrity of any European site." (§8.6.1). As explained above, given that no sites or funding have been found, mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. We believe there is no justification for this optimism, and that it is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

§9.2 Further work needed

Point 12, Summary:
It is claimed that further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. Yet it is acknowledged that the data upon which major decisions have been based is poor. No attempt will be made to get better data before the decisions are formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions. This is not how decision making is supposed to work.

"Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected." (§9.1.1). This decision was made in 2009. If SCDC had instead decided to commission a proper visitor survey at that time, it would probably be complete by now (2 years later), and could have provided a far more reliable basis for assessing the impact of the housing proposed in the Ipswich Borough and Suffolk Coastal Core Strategies.

Having acknowledged that the data is poor, the Appropriate Assessment makes the highly dubious claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." (§9.2.3) So a major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment's conclusions.

Summary:
The conclusion that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA is based on the invalid assumption that people won't walk more than 1km, and the unrealistic reliance on greenspace provision.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments:
Full letter

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Waldringfield Wildlife Group's objections to the revised LDF Core Strategy area:
1. Flawed and inconsistent reasoning
2. Lack of survey of current visitor numbers and their impact on the Deben SPA
3. Failure to consider cumulative impact of development on European sites
4. Contradictory information on mitigation measures
5. A general lack of concern shown towards the environmental issues raised in each of the consultations undertaken so far.

The 41 members of Waldringfield Wildlife Group continue to be deeply concerned with SCDC's LDF/Core Strategy. Following the previous rounds of consultation and the representations from the legal firms instructed by the action group NANT, a few minor changes have been made to the Appropriate Assessment and the Sustainability Appraisal, however these documents remain flawed, with inconsistent reasoning and a stubbornness of purpose which is quite remarkable. Considering that the documents to which these revisions have been made has been 10 years in the making, it is a poor reflection of the council's abilities.

WWG feels that the sum of the impact on protected wildlife areas of the 2000+ houses in the "area east of Ipswich" plus the 1,440 homes near Felixstowe has still not been considered. The whole of the Deben Estuary, including Martlesham Creek, Kirton Creek and Falkenham marshes, are part of the SPA and as such a full survey of existing visitor patterns should be carried out. Current estimates are based on figures from a rather limited survey carried out in 2004 and the anecdotal evidence from the small number of Land Managers consulted (Table 9.5.7.1). The limited survey carried out by NANT volunteers gives an indication of the attraction of a river side setting. Natural England are even recorded in the Revised AA, stating that "any development is likely to bring additional pressures to any of the sites of European interest, however, the area near Martlesham identified as preferred option could have particularly negative impacts on the Deben Estuary SPA/SSSI". NE also expresses similar concern at the proposed development in the areas north of Candlet Road and Felixstowe town, but these comments seem to have been ignored.

Basing predicted patterns of visitor behaviour on a survey of heathland in Dorset is seriously flawed thinking, there are too many variables for scientific validity. Like should be compared with like, similar habitat, similar attractions, similar wider environment. It is nonsense to suggest that as the proposed development site in the "area east of Ipswich" is 1km away from the AONB, people will not walk to the European sites of interest (6.2.45) Natural England's national survey (5.8.9) shows 1.6km as the average distance people will walk from their homes and the NANT survey showed that people walked an average of 3.8km to reach the Deben Estuary. These figures put the European sites well within the range of "the area east of Ipswich".

Mitigation and the much mentioned "Country Park" are put forward as protections for the European sites, but there are contradictions both within the Core Strategy and within common knowledge of SCC financial position. Where is the Country Park to be? Who will pay for its development and maintenance? When will it be available? The original suggestion of the Foxhall tip site (6.5 SP20) seems highly unsuitable, will there be a ban on smoking, barbecues and fireworks because of methane, will any ponds be carefully monitored for tip leachate? Noth the "high quality provision" (7.2.9) that people are being led to expect.

It is not only increasing pressure from walkers along the river banks, with or without dogs but an increase in boating activities which will occur if there is a large increase in population. This aspect has been largely disregarded. Canoeists, dinghy sailors and rowers close into the shore disturb feeding birds. The wash from larger motorboats not only disturbs wildlife but is detrimental to the saltmarsh habitat on which so many species rely.

In conclusion, WWG wishes to propose once again that the housing provision needs to be dispersed in small developments, with the inclusion of affordable homes, in villages and towns throughout the SCDC area. This would provide a more sustainable way forward for communities and for the environment.

Summary:

It is nonsense to suggest that as the proposed development site in the "area east of Ipswich" is 1km away from the AONB, people will not walk to the European sites of interest (6.2.45) Natural England's national survey (5.8.9) shows 1.6km as the average distance people will walk from their homes and the NANT survey showed that people walked an average of 3.8km to reach the Deben Estuary. These figures put the European sites well within the range of "the area east of Ipswich".

Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
### 3849 Object

**6 - Assessment of Each Policy**  
Impact on specific nearby sites alone or in combination

<table>
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<tr>
<th>Respondent:</th>
<th>Mr Tim Elliot [388]</th>
<th>Agent:</th>
<th>N/A</th>
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<tr>
<td><strong>Full Text:</strong></td>
<td>6.2.35 &quot;Parking in Waldringfield is limited&quot;. Not true - see attached photo of the PUBLIC car park, which has a capacity of at least 130 vehicles. There are at least two other parking sites in regular use by visitors. This sloppiness occurs everywhere in the document, and invalidates the conclusions.</td>
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<tr>
<td><strong>Summary:</strong></td>
<td>6.2.35 &quot;Parking in Waldringfield is limited&quot;. Not true - see attached photo of the PUBLIC car park, which has a capacity of at least 130 vehicles. There are at least two other parking sites in regular use by visitors. This sloppiness occurs everywhere in the document, and invalidates the conclusions.</td>
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#### Change to Plan

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#### Attachments:
- Waldringfield Car Park

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*Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).*
Appropriate Assessment for Core Strategy (August 2011)

**Object**

**6 - Assessment of Each Policy**

Impact on specific nearby sites alone or in combination

**Respondent:** Mr Jonathan Ruffle [2578]  
**Agent:** N/A

**Full Text:**

6.2.20 This is the second of four instances in this document where a conclusion is drawn directly before the validity of the evidence is dismissed.

6.2.22 This is the third of four instances in this document where a conclusion is drawn directly before the validity of the evidence is dismissed.

**Summary:**

6.2.20 This is the second of four instances in this document where a conclusion is drawn directly before the validity of the evidence is dismissed.

6.2.22 This is the third of four instances in this document where a conclusion is drawn directly before the validity of the evidence is dismissed.

**Change to Plan**

|-----------------|---------|---------|--------------------|-----------------
| Not Specified   | Not Specified | Not Specified | Not Specified | None |

**Attachments:**

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Upon reading the revised Appropriate Assessment and Sustainability Appraisal, in the areas that I am most concerned, impact and traffic, I refer you to my previous letter (attached) and make these additional comments.

Firstly, visitor impact on the Deben Estuary. It is stated in 6.2.28 "It is not possible with the current state of knowledge to be able to quantify the new amounts of disturbance or the impact caused". 6.2.30 states "It cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA". Further 6.2.34 "Without the further mitigation of provision at Martlesham, a new Country Park or similar high quality facility, it would not be possible to ascertain that there would ne not adverse affect upon the integrity of the Deben Estuary"

The need for mitigation in the form of a Country Park has long been acknowledged in previous reports and assessments. However, SP20 Ipswich Policy Area refers to "the unlikely hood of the Country Park being developed within the plan period". This is very concerning and further adds to the unsoundness of the whole project.

Secondly, traffic. Traffic has been an area I have continually focused on; the key issues of the capacity of the Orwell Bridge and A12/14 remain.

It is unrealistically assumed that people will abandon their cars and embrace cycling, non existent public transport and walking (SP10). That drivers will happily endure diversions around and through Ipswich when the Orwell Bridge is overburdened with 1ml more extra containers. The problem, already present, of capacity A12/A14 Orwell Bridge at peak times, is not addressed, although it is identified as a key issue "Capacity issues of the Orwell Bridge have been predicted and this could impact the rate of development in Suffolk Coastal" (p.38 Sustainability Appraisal).

It is disappointing to have to acknowledge the failings of Suffolk Coastal to address these issues, and indeed the heart of the matter, the building of 2,000 homes at Adastral Park, that I have long campaigned against.

Firstly, visitor impact on the Deben Estuary. It is stated in 6.2.28 "It is not possible with the current state of knowledge to be able to quantify the new amounts of disturbance or the impact caused". 6.2.30 states "It cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA". Further 6.2.34 "Without the further mitigation of provision at Martlesham, a new Country Park or similar high quality facility, it would not be possible to ascertain that there would ne not adverse affect upon the integrity of the Deben Estuary"
Comment

6 - Assessment of Each Policy

Impact on specific nearby sites alone or in combination

Respondent: Deben Estuary Partnership (Christine Block) [2600]  Agent: N/A

Full Text: Local Development Framework - Appropriate Assessment August 2011

Comments provided by the Deben Estuary Partnership on those parts of the Appropriate Assessment that focus on the Deben Estuary

The Deben Estuary Partnership (DEP) is a representative community based grouping with wide current and historic knowledge of the River Deben and the estuary area. They are working with the Environment Agency, Natural England, Suffolk Coastal District Council, Suffolk County Council and other organisations and currently partnering the EA and Coast and heaths in developing the Deben Estuary Plan which replaces the concept of an Estuary Strategy compiled by the EA alone.

The DEP commented on the first version of the Appropriate Assessment under three headings - Inaccuracies, Confusing interpretation of data / information used and Factors omitted from the document. They welcome the more detailed comparisons and assessment of policies relevant to the Deben Estuary but wish to comment on some recurring inaccuracies and misleading assessments which, in their view, confuse conclusions.

Inaccuracies

6.2.22 continues to state that the Deben Estuary near Martlesham is believed to have a low to moderate level of terrestrial recreational activity. This is based on the statement that ‘the estuary side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk’. As previously stated in 2009 the poor repair of the path along the river wall is, in large part, due to the numbers of visitors who, with heavily indented soles to their shoes, ‘walk-off’ the surface of the path and escalate damage. This is recognised in the present work that is using crushed concrete to refurbish the path along the wall and provide an adequate surface suitable for the large numbers of walkers.

Equally inaccurate is the claim that ‘there is no nearby visitor parking’. The nearest official public parking is indeed Woodbridge but the car park by Martlesham church – described as available for ‘casual parking’ – is rarely empty and it’s ‘casual’ status does not appear to deter visitors once they have discovered its location. The report is accurate when stating (6.2.34) that ‘the number of new visitors using the Martlesham church car park is not trivial.’ (Experience elsewhere on the Deben demonstrates that increasing numbers of visitors are not deterred by limited car parking - they do not leave the area when car parks, both public and private, are full but park along narrow roads in the determination to reach and enjoy the river area.)

6.2.37 The report describes footpaths north and south of Waldringfield as eroded and impassable. This implies that walkers do not use the paths while in reality a breach in the north and south river walls prevents a circular walk but does not stop walkers using sections of the paths - and often diverting onto farmland when they find their route is blocked. These difficulties may limit walking routes but do not eliminate visitors from these sections of the estuary.

Omission

Throughout the section headed Impact of the Strategic allocation east of Ipswich on Deben Estuary alone or in combination no reference is made to recreational disturbance from river users. Many people moving to new housing allocations will choose to live in the area because it gives them the opportunity to own and use a boat but the Appropriate Assessment does not recognise this significant pressure. It is acknowledged that the number boat owners and those enjoying recreational activities on the river is increasing and is not limited to holiday periods. There are more moorings on the river in a number of locations and membership of yacht and sailing clubs at Waldringfield, Felixstowe, Woodbridge and Bawdsey is substantial. The wash from powered watercraft is a serious factor in saltmarsh erosion - saltmarsh is a factor in assessment of the condition of SPAs. Two pleasure boats now offering trips up and down the river during the summer season encourage increasing numbers of visitors to the riverside.

Incomplete or confusing information

The paragraphs 5.3.7, to 5.3.17 dealing with calculations to predict visitor numbers are very confusing. The Office of National Statistics predicts a declining household size of around 2.25 people per household in 2027 but a population increase predicted by 2027 requiring an increase of some 11,000 houses is seen as an equivalent to only 1.57 ‘new’ people for every dwelling. Holiday homes are given a zero occupancy. In 5.3.14 data is calculated based on a number of assumptions - one of which is the use of a visitor survey conducted in 2004.

The DEP would draw attention to the use of data from this 2004 Suffolk Coast and Heaths Visitor Survey which they see as no longer providing a reliable evidence base. Recent local knowledge, shared with the Environment Agency in connection with the development of a Deben Estuary Management Plan, drew attention to increasing numbers of tourists coming to various points along the estuary. Promotion of the Suffolk coast as a holiday destination is extending the tourist season. Visitors are coming to the estuary both earlier and later in the year and this extends the likelihood of disturbance to SPA qualifying birds.

5.3.9 states that holiday homes will be considered to have zero occupancy. In terms of potential disturbance to Estuary
The Appropriate Assessment notes that, in 6.2.27, some 2000 houses at Martlesham could give rise to increased visitor use causing significant disturbance to SPA birds and trampling of water-edge habitat and a reference is made to a rare snail. Recent environmental analysis of the potential impact of work along this section of wall has highlighted the national significance of colonies of this snail and strict controls have been imposed by Natural England on areas that cannot be disturbed. Following the completion of work new fresh water scrapes will enhance high tide roosts for SPA qualifying birds. The potential degradation of this area of the Deben Estuary caused by increasing numbers of unmanaged visitors is under estimated.

Concluding comments
Methods of mitigation to counteract the impact of any increase in visitor numbers are put forward. The DEP note the cumulative impact that other land-use plans may have on nature conservation sites - the Deben estuary is seen as easily accessible, not only from Martlesham, but Felixstowe and north and east Ipswich. They support the proposals for green space and Country Parks, which could offer alternative recreational facilities - but fail to find adequate evidence in the Core Strategy to demonstrate that these are more than an aspiration.

For green space to be effective designated sites must be close to existing urban areas and new housing development and large enough to cater for a range of recreational activities - particularly dog walking. If residents have to travel any distance to a park it is likely that they will drive on to a favoured area - and, in the case of the Deben, that unquantifiable desire to be ‘by the water’ will come into play. It is felt that those residents who have time to do so may drive to a chosen destination rather than use a local green space - as demonstrated every morning by the many dog walkers who drive out of Woodbridge to Sutton Heath.

It should also be noted that many parts of the SPAs do not currently manage visitors - numbers are not restricted, dogs not controlled, alternatives to sensitive sites not signposted - freedoms that many visitors may resist giving up. The cost of introducing visitor management schemes and year round wardens would be substantial.

Drawing an accurate conclusion that there is no adverse effect on European sites must be further qualified by -
- the inconclusive knowledge regarding visitor numbers. References to the possible resultant increase of disturbance or trampling damage to qualifying features on estuarine / coastal sites are difficult to put in an accurate context and it is consequently 'not possible to ascertain that there will be no adverse effect upon the integrity of the Deben estuary SPA'.
- the somewhat limited nature of Natural England's monitoring regime of SPA sites and condition assessments which do not rule out visitor level impact. There are a number of references to the fact that the specific reasons for unfavourable condition do not include visitor / human pressures / recreational impacts when these may indeed be significant factors. The only redress to this is anecdotal evidence which suggests - as in 6.2.13, the Sandlings SPA - that 'current visitor levels are causing harm with dogs off leads having the greatest impact'.
- the lack of guidance on the level of adverse impact that constitutes unacceptable disturbance and damage to a European site.

It therefore remains difficult to accept (in 6.2.45) that 'provided that strategic housing proposals for development at Martlesham and Felixstowe Peninsula are greater than 1km from the Deben Estuary' and that there are 'improvements in accessibility to green space provision' it can be concluded that 'there would be no adverse affect upon the integrity of the respective European Sites'.

Christine Block
On behalf of the Deben Estuary Partnership
October 14th 2011

Summary: The Appropriate Assessment notes that, in 6.2.27, some 2000 houses at Martlesham could give rise to increased visitor use causing significant disturbance to SPA birds and trampling of water-edge habitat and a reference is made to a rare snail. Recent environmental analysis of the potential impact of work along this section of wall has highlighted the national significance of colonies of this snail and strict controls have been imposed by Natural England on areas that cannot be disturbed. The potential degradation of this area of the Deben Estuary caused by increasing numbers of unmanaged visitors is under estimated.

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4131 Comment
6 - Assessment of Each Policy Impact on specific nearby sites alone or in combination

Attachments:
Waldringfield Wildlife Group's objections to the revised LDF Core Strategy area:
1. Flawed and inconsistent reasoning
2. Lack of survey of current visitor numbers and their impact on the Deben SPA
3. Failure to consider cumulative impact of development on European sites
4. Contradictory information on mitigation measures
5. A general lack of concern shown towards the environmental issues raised in each of the consultations undertaken so far.

The 41 members of Waldringfield Wildlife Group continue to be deeply concerned with SCDC's LDF/Core Strategy. Following the previous rounds of consultation and the representations from the legal firms instructed by the action group NANT, a few minor changes have been made to the Appropriate Assessment and the Sustainability Appraisal, however these documents remain flawed, with inconsistent reasoning and a stubbornness of purpose which is quite remarkable. Considering that the documents to which these revisions have been made has been 10 years in the making, it is a poor reflection of the council's abilities.

WWG feels that the sum of the impact on protected wildlife areas of the 2000+ houses in the "area east of Ipswich" plus the 1,440 homes near Felixstowe has still not been considered. The whole of the Deben Estuary, including Martlesham Creek, Kirton Creek and Falkenhain marshes, are part of the SPA and as such a full survey of existing visitor patterns should be carried out. Current estimates are based on figures from a rather limited survey carried out in 2004 and the anecdotal evidence from the small number of Land Managers consulted (Table 9 5.7.1). The limited survey carried out by NANT volunteers gives an indication of the attraction of a river side setting. Natural England are even recorded in the Revised AA, stating that "any development is likely to bring additional pressures to any of the sites of European interest, however, the area near Martlesham identified as preferred option could have particularly negative impacts on the Deben Estuary SPA/SSSI". NE also expresses similar concern at the proposed development in the areas north of Candlet Road and Felixstowe town, but these comments seem to have been ignored.

Basing predicted patterns of visitor behaviour on a survey of heathland in Dorset is seriously flawed thinking, there are too many variables for scientific validity. Like should be compared with like, similar habitat, similar attractions, similar wider environment. It is nonsense to suggest that as the proposed development site in the "area east of Ipswich" is 1km away from the AONB, people will not walk to the European sites of interest (6.2.45) Natural England's national survey (5.8.9) shows 1.6km as the average distance people will walk from their homes and the NANT survey showed that people walked an average of 3.8km to reach the Deben Estuary. These figures put the European sites well within the range of "the area east of Ipswich".

Mitigation and the much mentioned "Country Park" are put forward as protections for the European sites, but there are contradictions both within the Core Strategy and within common knowledge of SCC financial position. Where is the Country Park to be? Who will pay for its development and maintenance? When will it be available? The original suggestion of the Foxhall tip site (6.5 SP20) seems highly unsuitable, will there be a ban on smoking, barbecues and fireworks because of methane, will any ponds be carefully monitored for tip leachate? Noth the "high quality provision" (7.2.9) that people are being led to expect.

It is not only increasing pressure from walkers along the river banks, with or without dogs but an increase in boating activities which will occur if there is a large increase in population. This aspect has been largely disregarded. Canoeists, dinghy sailors and rowers close into the shore disturb feeding birds. The wash from larger motorboats not only disturbs wildlife but is detrimental to the saltmarsh habitat on which so many species rely.

In conclusion, WWG wishes to propose once again that the housing provision needs to be dispersed in small developments, with the inclusion of affordable homes, in villages and towns throughout the SCDC area. This would provide a more sustainable way forward for communities and for the environment.

Summary: WWG feels that the sum of the impact on protected wildlife areas of the 2000+ houses in the "area east of Ipswich" plus the 1,440 homes near Felixstowe has still not been considered.
I OBJECT to the findings in the AA and SA as follows:

Appropriate Assessment
1. Assessment of European site visitor increases

OBJECTION
Summary
The data regarding visitor numbers to the Deben SPA is acknowledged to be inadequate - i.e. none exists apart from the Deben Visitor Survey (NANT). Therefore projections regarding the increase in visitor numbers resulting from the proposed housing at Adastral Park are guesswork. As are the resulting projections of potential damage and disturbance to environmentally sensitive sites. It behoves SCDC to conduct proper rigorous studies of visitor numbers to the Deben SPA to create a baseline against which to make realistic assessments.

2. Impact on specific sites

OBJECTION
Summary
It is inappropriate to attempt to predict the impact on the Deben SPA of the inhabitants of 2000 houses at Adastral Park from studies relating to completely different habitats (i.e. Dorset heathland) which are not comparable. The Deben is a tidal estuary, beautiful, remote, wild with many special environmental features and other attractions. NANT's Visitor Survey showed clearly what a draw the river is and that people with dogs walk/drive a great deal more than 1/8kms suggested here. Proper relevant research needs to be done.

3. Assessment of Policy SP2 Housing numbers

OBJECTION
Summary
The potential for problems and threats to the integrity of the Deben SPA from siting housing at Adastral Park is acknowledged (6.2.28 and 6.2.30) but SCDC continue to assert wrongly (see above) that people will walk/drive only 1/8kms. The need to provide adequate alternative green space is stated without indicating when/what that might be (see below). Contrary to what is stated at 6.2.35 there is now considerable public car parking available in Waldringfield thus increasing the attractiveness of the location. Contrary to what is stated in 6.2.36 the available riverside route remains attractive for walkers (see below).

4. Mitigation for Policy SP2

OBJECTION
Summary
It is disingenuous to continue to insist that the housing policies will have "no adverse effect" on the integrity of the Deben Estuary SPA (7.4.1). The discredited 1km figure is wheeled our again to justify development at Adastral Park (7.2.6). Provision of alternative green space should "precede or coincide with" Phase 1 of housing development (7.2.8). Although the idea of a country park is talked up the reality is that no site is available to precede of coincide with phase 1 and anyway SCC no longer funds country parks so it is a matter of pure speculation.

5. Limitations to the Assessment - Further work needed

OBJECTION
Summary
It is scandalous that having admitted that this policy is based on poor and inadequate data SCDC let themselves off the hook by claiming that they don't need to improve the quality of the data before adopting the Core Strategy and therefore opening the door to the building of 2000 houses at Adastral Park. SCDC need to make policy on the basis of sound and robust data not guesswork and speculation when so much is at stake.

Sustainability Appraisal
1. Appraisal of Core Strategy Policies - Ipswich Policy Area (SP20)

OBJECTION
Summary
It is incorrect to claim that SP20 is "marginally more sustainable" because the policy "seeks to preserve and enhance environmentally sensitive locations" by creating a country park at Foxhall Tip by the end of the plan period. AS stated above alternative green space has to be available at the beginning of the development to act as so-called mitigation in relation to building at Adastral Park.

2. SP20 Ipswich Policy Area

OBJECTION
Summary
It is unacceptable to devolve responsibility for safe-guarding Waldringfield and the Deben Estuary to an Area Acton Plan. Issues like congestion, traffic impacts and the increasing number of boats on the river causing problems to feeding birds and erosion of saltmarsh, the preservation of wildlife and habitat all need to be addressed now otherwise the policy is utterly flawed. The LDF needs to be based on robust policies that have addressed these problems and issues at the outset rather than kicking them into the long grass of an AAP.
### 4241 Object

6 - Assessment of Each Policy  
Impact on specific nearby sites alone or in combination

#### 3. Ipswich Policy Area SP20

**OBJECTION**

**Summary**

Again the discredited figure of 1km (see above) is used here to suggest that the integrity of the Deben Estuary can be maintained so long as building is more than 1km away from the river. The NANT survey showed that people walk much more than 1 km and therefore 2000 houses at Adastral Park will generate a huge increase in visitor numbers. SCDC are also wrong to suggest that signs saying "no through route" at Waldringfield deter walkers and thereby claim that birds are protected in those areas.

#### 4. Uncertainties and risks (6.9)

**OBJECTION**

**Summary**

If additional greenspace is required as mitigation for the 2000 houses at Adastral Park and there is grave uncertainty that it can be delivered at Foxhall Tip (the only potential site mentioned) then this already flawed plan should not go ahead.

The Appropriate Assessment and the Sustainability Appraisal have not addressed the issues of concern that I have raised before.

**Summary:**

The potential for problems and threats to the integrity of the Deben SPA from siting housing at Adastral Park is acknowledged (6.2.28 and 6.2.30) but SCDC continue to assert wrongly (see above) that people will walk/drive only 1/8kms. The need to provide adequate alternative green space is stated without indicating wher/what that might be (see below). Contrary to what is stated at 6.2.35 there is now considerable public car parking available in Waldringfield thus increasing the attractiveness of the location. Contrary to what is stated in 6.2.36 the available riverside route remains attractive for walkers (see below).

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**Attachments:**

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Appropriate Assessment for Core Strategy (August 2011)

3811 Object

6 - Assessment of Each Policy

Impact on specific nearby sites alone or in combination,
Impact of strategic allocation east of Ipswich on Deben

Respondent: Mr Stephen Clover [83]  
Agent: N/A

Full Text: The council has disqualified itself from being able to judge the issues objectively owing to participation by Members with personal interests - employment by BT, close family members employed by BT, or pensioners of BT. The LDF was tailored to fit the massive housing development which BT has proposed. The dependent well-being of the many Members of the council with financial links to BT corrupts the decision-making process. The adverse impact of the proposed development (which the LDF makes possible) appears not to register with some Members where their official role requires them to have put the public interest first.

Summary: The council has disqualified itself from being able to judge the issues objectively owing to participation by Members with personal interests - employment by BT, close family members employed by BT, or pensioners of BT. The LDF was tailored to fit the massive housing development which BT has proposed. The dependent well-being of the many Members of the council with financial links to BT corrupts the decision-making process. The adverse impact of the proposed development (which the LDF makes possible) appears not to register with some Members where their official role requires them to have put the public interest first.

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### 3848 Object

**6 - Assessment of Each Policy**

| Impact on specific nearby sites alone or in combination, Impact of strategic allocation east of Ipswich on Deben Estuary alone or in combination | None |

#### Respondent:
Mr Tim Elliot [388]

#### Agent:
N/A

#### Full Text:
6.2.34 "No data on visitor numbers is known." Not true - see NANT survey. This sloppiness occurs everywhere in the document, and invalidates the conclusions.

#### Summary:
6.2.34 "No data on visitor numbers is known." Not true - see NANT survey. This sloppiness occurs everywhere in the document, and invalidates the conclusions.

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Appropriate Assessment for Core Strategy (August 2011)

3923  Object
6 - Assessment of Each Policy

Impact on specific nearby sites alone or in combination, Impact of strategic allocation east of Ipswich on Deben Estuary alone or in combination - None

Respondent: Mr Jonathan Ruffle [2578]  Agent: N/A

Full Text:

There are many conclusions drawn throughout the document using fluctuating figures concerning an alleged 1km distance over which people living in the new town will not venture.

The drafters of the AA should be applauded for their honesty here at 6.2.28. Here they admit that the master plan for new housing may also include 'new footpath links to the estuary'.

If there are going to be new links to the estuary, then the whole access and therefore mitigation argument falls over.

To spell that out -- here we have a plan that envisages new paths to help new residents get to the very places that the mitigation measures are designed to stop them from going.

To spell it out again -- a fortune will be spent building country parks to persuade people not to use the paths to the estuary that are also being built.

This is an inconsistency that calls the whole document into question.

6.2.30 is presented as a double-negative. Could it be rewritten to more directly state that "It therefore can be ascertained that an allocation of 2320 new dwellings at Martlesham will have an adverse affect upon the integrity of Deben Estuary SPA near Martlesham..."

6.2.33 states "Recreation beside the estuary at Woodbridge is already great, so it is considered that there will be no extra impact on the SPA at that point from increased visitor numbers from new dwellings at Martlesham."

That's illogical. This argument says somewhere is busy. But that it'll be the same busy when there are 3000 more people up the road. That just isn't true.

6.2.35 Insufficient emphasis is given to the doubling of visitor numbers to the AONB. This is a key finding and should be highlighted. Instead, a slew of mitigation-speak is immediately deployed.

At the bottom of this paragraph is the fourth instance in this document where a conclusion is drawn directly before the validity of the evidence is dismissed.

6.2.36 might be taken to indicate that there is nowhere to go when you choose to walk at Waldringfield. This is not true.

6.2.37: it is accurate but galling to have the method of housing distribution requested by 97% of local people mentioned here in approving terms

Summary:

6.2.28: This section disposes of the mitigation concept: a fortune is about to be spent building country parks to persuade people not to go to the estuary -- on paths that are also to be built.

There is a misleading double negative at 6.2.30.

There is false logic at 6.2.33.

6.2.35 Insufficient emphasis is given to the doubling of visitor numbers to the AONB. This is a key finding and should be highlighted.

6.2.36 implies there is nowhere to walk at Waldringfield. Not true.

6.2.37: it is galling to have the method of housing distribution requested by 97% of local people mentioned here in approving terms

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### Object

**6 - Assessment of Each Policy**

Impact on specific nearby sites alone or in combination, Impact of strategic allocation east of Ipswich on Deben Estuary alone or in combination - None

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**Respondent:** Mr Charlie Ballam [2561]  
**Agent:** N/A

**Full Text:** In flux of visitors from new town will spoil the aonb.

**Summary:** In flux of visitors from new town will spoil the aonb.

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I OBJECT to the findings in the revised AA and SA dated August 2011.

Having read the document I see there are a number of factual errors and incorrect assumptions eg. The riverside footpath along the River Deben opposite Methersgate Quay down river to Early Creek is noted as impassable. In fact the stretches that are impassable are either side of this stretch and the paths in between are well used. The assumption made from this incorrect information is that people do not walk the path. This is utter rubbish and the path north of Waldringfield forms part of a popular circular walk with the lesser used section north of Manor House still used by local walkers. To the south of Waldringfield the path to Early Creek is a walk in itself. People will walk as far as the breach and then turn back. The breach is positioned roughly where there is a breeding colony of terns. The fields to the inland side of this path both north and south are often used for shooting parties and the paths and river also used for wildfowling in season, amongst other activities.

Most of the visitor surveys carried out are not relevant the area around Martlesham Creek and Waldringfield as they relate to the other side of the Deben. By definition the west bank of the Deben lies much closer to the areas denoted for development and will suffer from much more visitor pressure. Although the survey carried out by NANT is not as comprehensive as some others at least some effort has been made to obtain relevant information relating to these areas. SCDC would appear to have made no effort to obtain any more relevant information and have in fact relied on out of date surveys carried out in Dorset where conditions were different. Incorrect conclusions have thus been drawn.

Parking at Waldringfield is seen as self limiting however although there is now some public parking in a pay and display car park at the Maybush this does not stop people parking at the Sailing Club and causing security and access issues there, but also causing congestion along the narrow access road down to the river along the main route through the village or parking at the car parks in Church Field or the village Hall and walking down to the river along the roads or footpaths. Securing the sailing club car park is not an easy matter as many differing groups require access including guests visiting for sailing events hence a secure barrier is not the simple answer.

Mitigation is seen as essential, however Country Parks are being closed by the County Council who cannot afford to run them anymore and the area suggested would not be available at the commencement of the plan nor indeed at the likely end date. What should residents do in the meantime? and what happens when the proposed area fails to materialise? By then it will be too late! 10 years is a long period of pressure to absorb before any mitigation plans would commence. A country park cannot possibly offer the same attractions as the River Deben and the beach at Waldringfield as this is the only beach along the river. This area is also threatened with having the added attraction of a pontoon close to the Pub to provide even more easy access for yachts and power boats.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Summary:
Parking at Waldringfield is seen as self limiting however although there is now some public parking in a pay and display car park at the Maybush this does not stop people parking at the Sailing Club and causing security and access issues there, but also causing congestion along the narrow access road down to the river or parking at the car parks in Church Field or the village Hall. Securing the sailing club car park is not an easy matter as many differing groups require access.

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Object: 6 - Assessment of Each Policy

Impact on specific nearby sites alone or in combination, Impact of strategic allocation east of Ipswich on Deben Estuary alone or in combination - None

Respondent: Gill Glen [2400]  
Agent: N/A

Full Text: I object to the revised sustainability appraisal and appropriate assessment of the core strategy on the grounds that there are a large number of errors in the document. I highlight the main ones below.

APPROPRIATE ASSESSMENT

Table 3 estimates the increase in population as a result of the proposed housing. It takes a value of 1.57 as the number of new people per dwelling. No justification is provided for this value. Since the total number of people arising from these houses is a key input to this report this is unacceptable. Either this number is justified or a much higher number assumed to provide a margin of error. In any case the conclusions based on this value are suspect and should be identified as such. Further on in the document it states that the low figure of 1.57 is due to an unstated assumption that roughly one third of the future residents of any new housing will move out of existing housing in the area and hence will not be adding to the number of extra people living near the sensitive sites. This is an unproven assertion and again any conclusions based on this should be removed unless it can be proven or justified.

The document comments about lack of parking in the area limiting the number of people visiting. But this only applies at peak times. For the majority of the time parking is not an issue.

The document states "Estuary-side footpaths north and south of Waldringfield are eroded and impassable ... This limits the walking routes available from Waldringfield." This is true but does not mean that no one will ever use the path. It is still used along its navigable part.

Having acknowledged that the data is poor, the assessment makes the unsupportable claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." Since a major planning decision is being made on this evidence it beggars belief that the council can ignore this fundamental weakness. There appears to be no intention of obtaining any further evidence either. Is this because it might actually contradict the conclusions of this assessment?

No change has been made to the conclusions which the assessment reaches regarding mitigation: "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This is only true if mitigation is actually implemented and is available at the start of house building. There is no mention of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

The impact of extra people visiting the Waldringfield area is discussed in the document. There has been no alteration of the unsubstantiated claim that people are unlikely to walk further than 1km or drive further than 8km. These claims are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed. The 1km figure is invalid because:

- the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
- the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing.
- the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
- the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. This was confirmed by a study made by NANT, which showed that people walked an average of 3.8km to the Deben Estuary.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Although the document admits that there is only a small amount of data regarding visitor numbers to sites in Europe it goes on to draw a significant number of important conclusions from this data. This is a flawed approach and requires either more data to substantiate the claim or that the conclusions drawn be removed from the document.

Finally the true increase in the number of people visiting the sites cannot be given because the current number of visitors is unknown as no accurate survey has been undertaken.

SUSTAINABILITY APPRAISAL

In the review of SCDC's responses to consultation comments on the sustainability assessment and Reviewed Core Strategy many of the responses are inadequate and many simply state "No change to SA required" without any attempt to justify why this might be. Given the significance of the core strategy this is not acceptable.

This policy is described as "marginally more sustainable" by virtue of "the creation of a countryside park on the Foxhall tip by the end of the plan period". The reference to the Foxhall Tip is contradicted in the last paragraph where it states that designated areas will need to be safeguarded "by providing open space as part of the housing development at the beginning of the development". Also it is pointed out that "Foxhall Country Park is unlikely to be developed within the plan period". Consequently the policy is not more sustainable than before and in fact is less sustainable since no proposals have been made for any countryside parks at the beginning of the development.

Only the briefest mention is made of the potential impact of increased boating activities on the River Deben. In fact this is a potentially serious problem and has been ignored and passed across to the area action plan. Large boats, and particularly motor boats, have a powerful disturbing affect on feeding birds, and they are a major cause of erosion of the fragile saltmarsh ecosystem. This point has been made several times by NANT and Waldringfield PC and has been consistently ignored.

The document states "There is uncertainty as to when a country park could be delivered at Foxhall tip". The key point is that it will not be in place when any development on the 2000 houses at Martlesham begins. In spite of this the assertion is still present in the document that these 2,000 houses will have an insignificant impact on the nearby European sites. This will only be the case if mitigation appears at the start of house building, and is very unlikely to happen.

Summary: The document states "Estuary-side footpaths north and south of Waldringfield are eroded and impassable ... This limits the walking routes available from Waldringfield." This is true but does not mean that no one will ever use the path. It is still used along its navigable part.
Comments provided by the Deben Estuary Partnership on those parts of the Appropriate Assessment that focus on the Deben Estuary

The Deben Estuary Partnership (DEP) is a representative community based grouping with wide current and historic knowledge of the River Deben and the estuary area. They are working with the Environment Agency, Natural England, Suffolk Coastal District Council, Suffolk County Council and other organisations and currently partnering the EA and Coast and heaths in developing the Deben Estuary Plan which replaces the concept of an Estuary Strategy compiled by the EA alone.

The DEP commented on the first version of the Appropriate Assessment under three headings - Inaccuracies, Confusing interpretation of data / information used and Factors omitted from the document. They welcome the more detailed comparisons and assessment of policies relevant to the Deben Estuary but wish to comment on some recurring inaccuracies and misleading assessments which, in their view, confuse conclusions.

Inaccuracies

6.2.22 continues to state that the Deben Estuary near Martlesham is believed to have a low to moderate level of terrestrial recreational activity. This is based on the statement that 'the estuary side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk'. As previously stated in 2009 the poor repair of the path along the river wall is, in large part, due to the numbers of visitors who, with heavily indented soles to their shoes, 'walk-off' the surface of the path and escalate damage. This is recognised in the present work that is using crushed concrete to refurbish the path along the wall and provide an adequate surface suitable for the large numbers of walkers.

Equally inaccurate is the claim that 'there is no nearby visitor parking'. The nearest official public parking is indeed Woodbridge but the car park by Martlesham church - described as available for 'casual parking' - is rarely empty and it's 'casual' status does not appear to deter visitors once they have discovered its location. The report is accurate when stating (6.2.34) that 'the number of new visitors using the Martlesham church car park is not trivial'.

(Experience elsewhere on the Deben demonstrates that increasing numbers of visitors are not deterred by limited car parking - they do not leave the area when car parks, both public and private, are full but park along narrow roads in the determination to reach and enjoy the river area.)

6.2.37 The report describes footpaths north and south of Waldringfield as eroded and impassable. This implies that walkers do not use the paths while in reality a breach in the north and south river walls prevents a circular walk but does not stop walkers using sections of the paths - and often diverting onto farmland when they find their route is blocked. These difficulties may limit walking routes but do not eliminate visitors from these sections of the estuary.

Omission

Throughout the section headed Impact of the Strategic allocation east of Ipswich on Deben Estuary alone or in combination no reference is made to recreational disturbance from river users. Many people moving to new housing allocations will choose to live in the area because it gives them the opportunity to own and use a boat but the Appropriate Assessment does not recognise this significant pressure. It is acknowledged that the number boat owners and those enjoying recreational activities on the river is increasing and is not limited to holiday periods. There are more moorings on the river in a number of locations and membership of yacht and sailing clubs at Woodbridge, Felixstowe, Woodbridge and Bawdsey is substantial. The wash from powered watercraft is a serious factor in saltmarsh erosion - saltmarsh is a factor in assessment of the condition of SPAs. Two pleasure boats now offering trips up and down the river during the summer season encourage increasing numbers of visitors to the riverside.

Incomplete or confusing information

The paragraphs 5.3.7, to 5.3.17 dealing with calculations to predict visitor numbers are very confusing. The Office of National Statistics predicts a declining household size of around 2.25 people per household in 2027 but a population increase predicted by 2027 requiring an increase of some 11,000 houses is seen as an equivalent to only 1.57 ‘new’ people for every dwelling. Holiday homes are given a zero occupancy. In 5.3.14 data is calculated based on a number of assumptions - one of which is the use of a visitor survey conducted in 2004.

The DEP would draw attention to the use of data from this 2004 Suffolk Coast and Heaths Visitor Survey which they see as no longer providing a reliable evidence base. Recent local knowledge, shared with the Environment Agency in connection with the development of a Deben Estuary Management Plan, drew attention to increasing numbers of tourists coming to various points along the estuary. Promotion of the Suffolk coast as a holiday destination is extending the tourist season. Visitors are coming to the estuary both earlier and later in the year and this extends the likelihood of disturbance to SPA qualifying birds.

5.3.9 states that holiday homes will be considered to have zero occupancy. In terms of potential disturbance to Estuary

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
6.2.22 states the Deben Estuary near Martlesham has low to moderate level of terrestrial recreational activity. A lot of people use the paths, this wears them down.

Equally inaccurate is the claim that 'there is no nearby visitor parking'. The car park by Martlesham church is rarely empty.

'the number of new visitors using the Martlesham church car park is not trivial.' - correct

6.2.37 describes footpaths north and south of Waldringfield as eroded and impassable. does not stop walkers using 'the number of new visitors using the Martlesham church car park is not trivial.' - correct

It should also be noted that many parts of the SPAs do not currently manage visitors - numbers are not restricted, dogs not controlled, alternatives to sensitive sites not signposted - freedoms that many visitors may resist giving up. The cost of introducing visitor management schemes and year round wardens would be substantial.

Drawing an accurate conclusion that there is no adverse effect on European sites must be further qualified by -
"the inconclusive knowledge regarding visitor numbers. References to the possible resultant 'increase of disturbance or trampling damage to qualifying features on estuarine / coastal sites' are difficult to put in an accurate context and it is consequently 'not possible to ascertain that there will be no adverse effect upon the integrity of the Deben estuary SPA'.

"the somewhat limited nature of Natural England's monitoring regime of SPA sites and condition assessments which do not rule out visitor level impact. There are a number of references to the fact that the specific reasons for unfavourable condition do not include visitor / human pressures / recreational impacts when these may indeed be significant factors. The only redress to this is anecdotal evidence which suggests - as in 6.2.13, the Sandlings SPA - that 'current visitor levels are causing harm with dogs off leads having the greatest impact'.

"the lack of guidance on the level of adverse impact that constitutes unacceptable disturbance and damage to a European site

It therefore remains difficult to accept ( in 6.2.45 ) that 'provided that strategic housing proposals for development at Martlesham and Felixstowe Peninsula are greater than 1km from the Deben Estuary' and that there are 'improvements in accessibility to green space provision' it can be concluded that 'there would be no adverse affect upon the integrity of the respective European Sites'.

Christine Block
On behalf of the Deben Estuary Partnership
October 14th 2011

Summary:
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### 4127 Comment

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**6 - Assessment of Each Policy**

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**Attachments:**

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Inaccuracies

6.2.22 continues to state that the Deben Estuary near Martlesham is believed to have a low to moderate level of terrestrial recreational activity. This is based on the statement that ‘the estuary side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk’. As previously stated in 2009, the poor repair of the path along the river wall is in large part, due to the numbers of visitors who, with heavily indented soles to their shoes, ‘walk-off’ the surface of the path and escalate damage. This is recognised in the present work that is using crushed concrete to refurbish the path along the wall and provide an adequate surface suitable for the large numbers of walkers.

Equally inaccurate is the claim that ‘there is no nearby visitor parking’. The nearest official public parking is indeed Woodbridge but the car park by Martlesham church - described as available for ‘casual parking’ - is rarely empty and it’s ‘casual’ status does not appear to deter visitors once they have discovered its location. The report is accurate when stating (6.2.34) that ‘the number of new visitors using the Martlesham church car park is not trivial’. (Experience elsewhere on the Deben demonstrates that increasing numbers of visitors are not deterred by limited car parking; they do not leave the area when car parks, both public and private, are full but park along narrow roads in the determination to reach and enjoy the river area.)

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The DEP would draw attention to the use of data from this 2004 Suffolk Coast and Heaths Visitor Survey which they see as no longer providing a reliable evidence base. Recent local knowledge, shared with the Environment Agency in connection with the development of a Deben Estuary Management Plan, drew attention to increasing numbers of tourists coming to various points along the estuary. Promotion of the Suffolk coast as a holiday destination is extending the tourist season. Visitors are coming to the estuary both earlier and later in the year and this extends the likelihood of disturbance to SPA qualifying birds.

5.3.9 states that holiday homes will be considered to have zero occupancy. In terms of potential disturbance to Estuary
sites this seems to contradict recognised patterns of behaviour. Many of the existing holiday or ‘second’ homes are owned by long standing ‘part-time’ residents who share their time in Suffolk with work elsewhere. Their visits continue through 12 months of the year and the ‘occupancy’ of their homes is regularly supplemented by guests who come to enjoy the area. Even when properties are simply holiday lets, attention must be drawn to the growing demand for accommodation and lengthening holiday period.

The Appropriate Assessment notes that, in 6.2.27, some 2000 houses at Martlesham could give rise to increased visitor use causing significant disturbance to SPA birds and trampling of water-edge habitat and a reference is made to a rare snail. Recent environmental analysis of the potential impact of work along this section of wall has highlighted the national significance of colonies of this snail and strict controls have been imposed by Natural England on areas that cannot be disturbed. Following the completion of work new fresh water scrapes will enhance high tide roosts for SPA qualifying birds. The potential degradation of this area of the Deben Estuary caused by increasing numbers of unmanaged visitors is under estimated.

Concluding comments

Methods of mitigation to counteract the impact of any increase in visitor numbers are put forward. The DEP note the cumulative impact that other land-use plans may have on nature conservation sites - the Deben estuary is seen as easily accessible, not only from Martlesham, but Felixstowe and north and east Ipswich. They support the proposals for green space and Country Parks, which could offer alternative recreational facilities - but fail to find adequate evidence in the Core Strategy to demonstrate that these are more than an aspiration.

For green space to be effective designated sites must be close to existing urban areas and new housing development and large enough to cater for a range of recreational activities - particularly dog walking. If residents have to travel any distance to a park it is likely that they will drive on to a favoured area - and, in the case of the Deben, that unquantifiable desire to be 'by the water' will come into play. It is felt that those residents who have time to do so may drive to a chosen destination rather than use a local green space - as is demonstrated every morning by the many dog walkers who drive out of Woodbridge to Sutton Heath.

It should also be noted that many parts of the SPAs do not currently manage visitors - numbers are not restricted, dogs not controlled, alternatives to sensitive sites not signposted - freedoms that many visitors may resist giving up. The cost of introducing visitor management schemes and year round wardens would be substantial.

Drawing an accurate conclusion that there is no adverse effect on European sites must be further qualified by -
* the inconclusive knowledge regarding visitor numbers. References to the possible resultant 'increase of disturbance or trampling damage to qualifying features on estuarine / coastal sites' are difficult to put in an accurate context and it is consequently 'not possible to ascertain that there will be no adverse effect upon the integrity of the Deben estuary SPA'.
* the somewhat limited nature of Natural England's monitoring regime of SPA sites and condition assessments which do not rule out visitor level impact. There are a number of references to the fact that the specific reasons for unfavourable condition do not include visitor / human pressures / recreational impacts when these may indeed be significant factors. The only redress to this is anecdotal evidence which suggests - as in 6.2.13, the Sandlings SPA - that 'current visitor levels are causing harm with dogs off leads having the greatest impact'.
* the lack of guidance on the level of adverse impact that constitutes unacceptable disturbance and damage to a European site

It therefore remains difficult to accept (in 6.2.45 ) that 'provided that strategic housing proposals for development at Martlesham and Felixstowe Peninsula are greater than 1km from the Deben Estuary' and that there are 'improvements in accessibility to green space provision' it can be concluded that 'there would be no adverse affect upon the integrity of the respective European Sites'.

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Christine Block
On behalf of the Deben Estuary Partnership
October 14th 2011

Summary:
No reference is made to recreational disturbance from river users. Many people moving to new housing allocations will chose to own boats but the AA does not recognise this pressure. There are more moorings on the river in a number of locations and membership of yacht and sailing clubs at Waldringfield, Felixstowe, Woodbridge and Bawdsey is substantial. The wash from powered watercraft is a serious factor in saltmarsh erosion. Two pleasure boats now offering trips up and down the river during the summer season encourage increasing numbers of visitors to the riverside.

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Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
C - 4128 - 2600 - Impact on specific nearby sites alone or in combination, Impact of strategic allocation east of Ipswich on Deben Estuary alone or in combination - None

4128  Comment

6 - Assessment of Each Policy  Impact on specific nearby sites alone or in combination, Impact of strategic allocation east of Ipswich on Deben
Impact on specific nearby sites alone or in combination, Impact of the strategic allocation at Felixstowe on Stour and Orwell Estuaries SPA and Deben SPA alone or in combination - None

3894  Comment

6 - Assessment of Each Policy

Impact on specific nearby sites alone or in combination, Impact of the strategic allocation at Felixstowe on Stour

Respondent: Trimley St Mary Parish Council (Mrs Debra Cooper)  Agent: N/A

Full Text: The sensitivity of the River Orwell estuary should be safeguarded.

Summary: The sensitivity of the River Orwell estuary should be safeguarded.

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6.2.45 reaches a conclusion based on two entirely false pieces of information.
1. There is no planned "Green Space" to mitigate the effects of building close to the estuary nor is there any funding available to provide one.
2. To use the 1km rule is a disgraceful use of discredited information.
This paragraph alone discredits the entire LDF and renders the whole process unsound

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Not Specified | Not Specified | Not Specified | Not Specified | None

Attachments:

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3854  Object
6 - Assessment of Each Policy  Summary of initial conclusions

Respondent: Mr Tim Elliot [388]  Agent: N/A

Full Text:
"6.2.45 Provided that strategic housing proposals for development at Martlesham and Felixstowe Peninsula are greater than 1km from the Deben Estuary and Orwell Estuary respectively, ... it is unlikely that visitor recreation activity would substantially increase on the foreshore of those estuaries." This is not a valid conclusion in light of the NANT visitor survey finding that visitors travel on foot an average of 3.8 km to reach the waterside.

This illogical conclusion invalidates the whole AA.

Summary:
"6.2.45 Provided that strategic housing proposals for development at Martlesham and Felixstowe Peninsula are greater than 1km from the Deben Estuary and Orwell Estuary respectively, ... it is unlikely that visitor recreation activity would substantially increase on the foreshore of those estuaries." This is not a valid conclusion in light of the NANT visitor survey finding that visitors travel on foot an average of 3.8 km to reach the waterside.

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Appropriate Assessment for Core Strategy (August 2011)

3924 Object
6 - Assessment of Each Policy

Summary of initial conclusions

Respondent: Mr Jonathan Ruffle [2578]
Agent: N/A

Full Text:
The report writers believe 6.2.45.
Local people do not.
We have eyes, they have figures.

Summary:
The report writers believe 6.2.45.
Local people do not.
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Comments provided by the Deben Estuary Partnership on those parts of the Appropriate Assessment that focus on the Deben Estuary.

The Deben Estuary Partnership (DEP) is a representative community-based grouping with wide current and historic knowledge of the River Deben and the estuary area. They are working with the Environment Agency, Natural England, Suffolk Coastal District Council, Suffolk County Council and other organisations and currently partnering the EA and Coast and heaths in developing the Deben Estuary Plan which replaces the concept of an Estuary Strategy compiled by the EA alone.

The DEP commented on the first version of the Appropriate Assessment under three headings - Inaccuracies, Confusing interpretation of data/information used and Factors omitted from the document. They welcome the more detailed comparisons and assessment of policies relevant to the Deben Estuary but wish to comment on some recurring inaccuracies and misleading assessments which, in their view, confuse conclusions.

Inaccuracies

6.2.22 continues to state that the Deben Estuary near Martlesham is believed to have a low to moderate level of terrestrial recreational activity. This is based on the statement that ‘the estuary side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk’. As previously stated in 2009 the poor repair of the path along the river wall is, in large part, due to the numbers of visitors who, with heavily indented soles to their shoes, ‘walk-off’ the surface of the path and escalate damage. This is recognised in the present work that is using crushed concrete to refurbish the path along the wall and provide an adequate surface suitable for the large numbers of walkers.

Equally inaccurate is the claim that ‘there is no nearby visitor parking’. The nearest official public parking is indeed Woodbridge but the car park by Martlesham church - described as available for ‘casual parking’ - is rarely empty and it’s ‘casual’ status does not appear to deter visitors once they have discovered its location. The report is accurate when stating (6.2.34) that ‘the number of new visitors using the Martlesham church car park is not trivial.’

(Experience elsewhere on the Deben demonstrates that increasing numbers of visitors are not deterred by limited car parking - they do not leave the area when car parks, both public and private, are full but park along narrow roads in the determination to reach and enjoy the river area.)

6.2.37 The report describes footpaths north and south of Waldringfield as eroded and impassable. This implies that walkers do not use the paths while in reality a breach in the north and south river walls prevents a circular walk but does not stop walkers using sections of the paths - and often diverting onto farmland when they find their route is blocked. These difficulties may limit walking routes but do not eliminate visitors from these sections of the estuary.

Omission

Throughout the section headed Impact of the Strategic allocation east of Ipswich on Deben Estuary alone or in combination no reference is made to recreational disturbance from river users. Many people moving to new housing allocations will choose to live in the area because it gives them the opportunity to own and use a boat but the Appropriate Assessment does not recognise this significant pressure. It is acknowledged that the number boat owners and those enjoying recreational activities on the river is increasing and is not limited to holiday periods. There are more moorings on the river in a number of locations and membership of yacht and sailing clubs at Waldringfield, Felixstowe, Woodbridge and Bawdsey is substantial. The wash from powered watercraft is a serious factor in saltmarsh erosion - saltmarsh is a factor in assessment of the condition of SPAs. Two pleasure boats now offering trips up and down the river during the summer season encourage increasing numbers of visitors to the riverside.

Incomplete or confusing information

The paragraphs 5.3.7, to 5.3.17 dealing with calculations to predict visitor numbers are very confusing. The Office of National Statistics predicts a declining household size of around 2.25 people per household in 2027 but a population increase predicted by 2027 requiring an increase of some 11,000 houses is seen as an equivalent to only 1.57 ‘new’ people for every dwelling. Holiday homes are given a zero occupancy. In 5.3.14 data is calculated based on a number of assumptions - one of which is the use of a visitor survey conducted in 2004.

The DEP would draw attention to the use of data from this 2004 Suffolk Coast and Heaths Visitor Survey which they see as no longer providing a reliable evidence base. Recent local knowledge, shared with the Environment Agency in connection with the development of a Deben Estuary Management Plan, drew attention to increasing numbers of tourists coming to various points along the estuary. Promotion of the Suffolk coast as a holiday destination is extending the tourist season. Visitors are coming to the estuary both earlier and later in the year and this extends the likelihood of disturbance to SPA qualifying birds.

5.3.9 states that holiday homes will be considered to have zero occupancy. In terms of potential disturbance to Estuary
Appropriate Assessment for Core Strategy (August 2011)

4133  Comment

6 - Assessment of Each Policy  Summary of initial conclusions

sites this seems to contradict recognised patterns of behaviour. Many of the existing holiday or 'second' homes are owned by long standing 'part-time' residents who share their time in Suffolk with work elsewhere. Their visits continue through 12 months of the year and the 'occupancy' of their homes is regularly supplemented by guests who come to enjoy the area. Even when properties are simply holiday lets, attention must be drawn to the growing demand for accommodation and lengthening holiday period.

The Appropriate Assessment notes that, in 6.2.27, some 2000 houses at Martlesham could give rise to increased visitor use causing significant disturbance to SPA birds and trampling of water-edge habitat and a reference is made to a rare snail. Recent environmental analysis of the potential impact of work along this section of wall has highlighted the national significance of colonies of this snail and strict controls have been imposed by Natural England on areas that cannot be disturbed. Following the completion of work new fresh water scrapes will enhance high tide roosts for SPA qualifying birds. The potential degradation of this area of the Deben Estuary caused by increasing numbers of unmanaged visitors is under estimated.

Concluding comments

Methods of mitigation to counteract the impact of any increase in visitor numbers are put forward. The DEP note the cumulative impact that other land-use plans may have on nature conservation sites - the Deben estuary is seen as easily accessible, not only from Martlesham, but Felixstowe and north and east Ipswich. They support the proposals for green space and Country Parks, which could offer alternative recreational facilities - but fail to find adequate evidence in the Core Strategy to demonstrate that these are more than an aspiration.

For green space to be effective designated sites must be close to existing urban areas and new housing development and large enough to cater for a range of recreational activities - particularly dog walking. If residents have to travel any distance to a park it is likely that they will drive on to a favoured area - and, in the case of the Deben, that unquantifiable desire to be 'by the water' will come into play. It is felt that those residents who have time to do so may drive to a chosen destination rather than use a local green space - as is demonstrated every morning by the many dog walkers who drive out of Woodbridge to Sutton Heath.

It should also be noted that many parts of the SPAs do not currently manage visitors - numbers are not restricted, dogs not controlled, alternatives to sensitive sites not signposted - freedoms that many visitors may resist giving up. The cost of introducing visitor management schemes and year round wardens would be substantial.

Drawing an accurate conclusion that there is no adverse effect on European sites must be further qualified by -
- the inconclusive knowledge regarding visitor numbers. References to the possible resultant increase of disturbance or trampling damage to qualifying features on estuarine / coastal sites are difficult to put in an accurate context and it is consequently 'not possible to ascertain that there will be no adverse effect upon the integrity of the Deben estuary SPA'.
- the somewhat limited nature of Natural England's monitoring regime of SPA sites and condition assessments which do not rule out visitor level impact. There are a number of references to the fact that the specific reasons for unfavourable condition do not include visitor / human pressures / recreational impacts when these may indeed be significant factors. The only redress to this is anecdotal evidence which suggests - as in 6.2.13, the Sandlings SPA - that 'current visitor levels are causing harm with dogs off leads having the greatest impact'.
- the lack of guidance on the level of adverse impact that constitutes unacceptable disturbance and damage to a European site

It therefore remains difficult to accept ( in 6.2.45 ) that 'provided that strategic housing proposals for development at Martlesham and Felixstowe Peninsula are greater than 1km from the Deben Estuary' and that there are 'improvements in accessibility to green space provision' it can be concluded that 'there would be no adverse affect upon the integrity of the respective European Sites'.

Christine Block

On behalf of the Deben Estuary Partnership
October 14th 2011

Summary: It therefore remains difficult to accept ( in 6.2.45 ) that 'provided that strategic housing proposals for development at Martlesham and Felixstowe Peninsula are greater than 1km from the Deben Estuary' and that there are 'improvements in accessibility to green space provision' it can be concluded that 'there would be no adverse affect upon the integrity of the respective European Sites'.

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Comment

6 - Assessment of Each Policy

Summary of initial conclusions
This letter is the formal submission from Save Felixstowe Countryside to the above consultations, as they affect the Felixstowe peninsula, and wishes to register its objection to all aspects of the consultations. We would ask you to note our comment that your on-line submission system is time-consuming, impossible to search sufficiently to target relevant comments and designed to deter stakeholders from responding.

With regard to sustainability, Save Felixstowe Countryside is concerned at the lack of evidence to support this in the following areas:

Traffic / Mitigation

The A14 to the Orwell Bridge is running at 90% capacity now, and the Port is said to be adding another 100,000+ lorries over the next ten years. 1760 new homes on the Felixstowe peninsula will potentially add another 3000 vehicles to the local road network which is already close to gridlock.

We believe that the LDF traffic mitigation aspirations are completely unrealistic and will have, at best, only marginal impacts on the extra congestion.

Mitigation measures are virtually impossible to put in place as it is unrealistic to limit new residents to the use of public or sustainable transport. Even people who live close to their place of work may choose to go by car as this offers a higher degree of flexibility and comfort than public transport or cycling/walking.

Infrastructure / Mitigation

There is no evidence to support the LDF’s aspiration that developers will provide all/any of the infrastructure necessary to sustain housing numbers on this scale, and would inevitably look to the District to provide whatever was necessary - or the community would go without, which is the more likely option.

Employment / Mitigation

Currently there is almost total reliance on the Port of Felixstowe, with local tourism and service industries being in serious decline. The London Gateway Port at Southend, whose deep-water berth facilities will be available in less than two years, will pose a serious threat to the Port of Felixstowe which itself will be looking to save money and make savings through automation and reducing staff numbers. Their quote of providing 1600 more jobs is seen as propaganda to support their 125th anniversary celebrations, and is unsubstantiated by any evidence.

For the foreseeable future the economic climate does not offer any mitigation against reliance on one employer. Small specialist companies distributed across the District are likely to be the main sources of employment, therefore a sustainable planning policy would place increased housing within reach of those areas in order to reduce the reliance on commuting.

Affordable Housing / Mitigation

Suffolk Coastal has a 1 in 3 policy of Affordable Homes provision. However, in a number of current small developments this policy has been “factored out” as developers strive to build high-end homes in affluent areas. To compensate for this, they will look to concentrate lower-end homes all together, creating a “ghetto” effect which will detract from the quality of life enjoyed by people in the locality at present.

It is acknowledged within the Core Strategy that the future role of foreign economic migrants is not considered within the Plan. Therefore, to restrict Affordable Housing will be to exclude the inevitable influx of members of this group, while a large supply of executive high-end homes will ensure the continuing influx of people of/nearing retirement age which the LDF does not consider a “sustainable” group.

Environment / Mitigation

Inevitable increases in traffic on the A14 and local road network will increase air pollution on a peninsula already suffering light and noise pollution from a busy Port. This will have an unavoidable adverse effect on ALL residents which in our view does not support the planning policy as being sustainable.

Landscape / Mitigation

The visual landscape will be destroyed in many parts of the Felixstowe peninsula, and while no-one is entitled to a “view”, taking away a visual amenity is known to have an adverse effect on morale and social behaviour within the local
We also do not agree that sustainable development will respect the character of settlements and landscape, as the character of our rural landscape will be completely destroyed by any housing development.

Flooding / Mitigation

The David Lock report identified brownfield land within the peninsula which could accommodate hundreds of homes without any need to touch greenfield land. These sites were subsequently excluded on grounds that they were subject to flooding.

However, the Environment Agency allows development in flood risk areas where the benefits of development outweigh the risks, as long as these developments include mitigation measures to minimise the risk.

Â£10 million is currently being spent on new sea defences which are said to be necessary to protect "1000 homes and businesses for the next 100 years".

These defences would therefore provide the mitigation that would allow brownfield sites previously excluded to be brought back into the equation and preserve greenfield land for agricultural use, which was stated by Suffolk Coastal as one of its priorities following the Orwell Hotel meeting in August 2008.

Appropriate Assessment

The Rt Hon David Cameron, when he wrote to the National Trust, assured us that "sustainable development means maintaining a balance between economic, environmental and social concerns". However, we have seen no evidence of this being taken into account by Suffolk Coastal District Council when putting together its Core Strategy, which we continue to reject as being not economically viable, not environmentally friendly and undertaken without the support of the community.

Your own statements confirming that the above factors were considered during plan preparation would indicate that a thorough and independent examination of the plan and its implications had been undertaken. It is therefore a surprise to find that the main contributors are either employed by, or attached to, Suffolk County Council. As the County Council would itself benefit from new development on this scale, it is questionable whether the appraisal has been independently audited for sustainability and soundness.

General

In summary, Save Felixstowe Countryside rejects the Sustainability Appraisal and Appropriate Assessment consultations in their entirety. We also re-state our objection to the scale of new homes proposed for the Felixstowe peninsula and the proposal to build on greenfield land.

The District Council has now been relieved of its obligation to provide a statutory number of homes, and has been told by its own government to make its decisions in the best interests of the local area. It is our view that what is proposed for Felixstowe is not in the Town's best interests.

Summary:

The aim to provide more than 1600 jobs at Felixstowe Port is unrealistic and unsubstantiated by any evidence. For the foreseeable future the economic climate does not offer any mitigation against reliance on one employer. Small specialist companies distributed across the District are likely to be the main sources of employment, therefore a sustainable planning policy would place increased housing within reach of those areas in order to reduce the reliance on commuting.

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Appropriate Assessment for Core Strategy (August 2011)

3925 Object
6 - Assessment of Each Policy Impact upon European Sites

Respondent: Mr Jonathan Ruffle [2578] Agent: N/A

Full Text: 6.3.5 ignores the lunchtime, happy hour and Friday rushes to local pubs by the existing workforce at BT Martlesham.

Everyone here knows about this, so how can the report claim there will be no extra visits as a result of the employment facilities?

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Object

6 - Assessment of Each Policy

Impact upon European Sites

Respondent: Mr Jonathan Ruffle [2578]  
Agent: N/A

Full Text: 6.4.3 states: "All the European sites within Suffolk Coastal District are within the existing Suffolk Coast and Heaths AONB, where development is strictly limited, so there will be no direct impact of development and little change in visitor pressure."

This should be amended to read 'adjacent development will corrupt the whole purpose of an AONB, and visitor pressure will be doubled' - see this reports conclusions at 6.2.35

Summary: 6.4.3 states: "All the European sites within Suffolk Coastal District are within the existing Suffolk Coast and Heaths AONB, where development is strictly limited, so there will be no direct impact of development and little change in visitor pressure."

This should be amended to read 'adjacent development will corrupt the whole purpose of an AONB, and visitor pressure will be doubled' - see this reports conclusions at 6.2.35

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Not Specified Not Specified Not Specified Not Specified None

Attachments:
Despite some minor changes to these documents, there remain inconsistencies and invalid arguments:

1. No accurate and rigorous survey of current visitors to the river Deben has been undertaken. Instead figures from a 2004 survey, plus information from a totally different habitat (heathland) in a completely different part of the country (Dorset) have been used to make assumptions about the impact of the proposed development on the Natura 2000 sites.
2. If no accurate data are available for the current situation, how is it possible to make an estimate of future visitor impact from the three large developments proposed - Martlesham, Felixstowe and Ipswich Borough Council?
3. Foxhall tip is proposed as the site of a new Country Park, descriptions are given of the facilities it could provide and how it could attract visitors away from the European sites. However at one point it is stated that the Country Park should be available from the start of the developments and then says that "there is uncertainty as to when a country park could be delivered at Foxhall tip".
4. Who will fund and manage the Country Park? - wherever it might be.

Summary:
Foxhall tip is proposed as the site of a new Country Park, descriptions are given of the facilities it could provide and how it could attract visitors away from the European sites. However at one point it is stated that the Country Park should be available from the start of the developments and then says that "there is uncertainty as to when a country park could be delivered at Foxhall tip".
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Attachments:
Letter from Mr P Maddison
full text
I OBJECT to the findings in the revised Appropriate Assessment dated August 2011.

Issues identified in previous consultation responses have not been addressed in the new version of this document and weight is still given to out of date and inappropriate data.

In Section 5 (sub-sections 5.1 and 5.3) there is unwarranted extrapolation of an inadequate data set relating to European site visitor increases resulting from an increased human population. In sub-sections 5.3.7 to 5.3.13 a figure from the now discredited Oxford Economics Study is used for the number of people per new dwelling.

Claims that people, including residents of the proposed new development, are unlikely to walk further than 1km or drive further than 8km in order to access an area of natural beauty are absurd, as is the reliance on the current limit to available parking in Waldringfield as a means of constraining an increase in visitor numbers that would otherwise result from the new development.

Mention is made of the South Sandlings Survey and the Deben Visitor Survey but these do not appear to have been fed into the conclusions.

No site has been identified for a new country park, and there is no information about the costs of establishing such an amenity. It therefore seems unlikely to me that it will ever be provided, particularly given the continuing pressure on public finances.

I therefore believe that the LDF should be debated further by cabinet.

Summary:
No site has been identified for a new country park, and there is no information about the costs of establishing such an amenity. It therefore seems unlikely to me that it will ever be provided, particularly given the continuing pressure on public finances.

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Attachments:
-full text
-Email from Mr Wilmot
My name is Mariah Skellorn and I OBJECT to the findings in the revised AA and SA dated August 2011.

The issues identified in my previous consultation responses have not been addressed by the revisions in the AA and SA.

- The AA still uses out of date and irrelevant data.

- New data, i.e. the South Sandlings Survey and the Deben Visitor Survey have been acknowledged and then thoroughly ignored in the conclusions.

- The so called "suite of mitigation measures" includes a new country park. No site has been identified or costed for this and there is no evidence that this will materialise.

- On the basis of these revisions the LDF should be returned to the cabinet for further debate.

The so called "suite of mitigation measures" includes a new country park. No site has been identified or costed for this and there is no evidence that this will materialise.
I am writing to OBJECT to the findings in the revised Appropriate Assessment and Sustainability Appraisal. The issues I, and others, raised in previous consultation responses are not addressed in either the Appropriate Assessment or the Sustainability Appraisal.

The data is flawed (based on a five year-old study in Dorset, an area very different in character from Suffolk); and more recent surveys (South Sandlings Survey, Deben Visitor Survey) have been ignored.

There is no detail on the "country park" proposed as a mitigation measure.

The LDF needs much more detailed and relevant debate.

Summary:

There is no detail on the "country park" proposed as a mitigation measure.

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Attachments:
This document is full of pseudo-scientific statistics that do nothing but conceal facts. For instance, it is clearly absurd to argue that you can place thousands of houses between Martlesham and Waldringfield and this will have no impact on the River Deben because percentage wise this is a small fraction of the population of Ipswich.

This point is finally conceded in Section 5.6.7 (page 26) but no attempt is made to recalculate the tiny figures presented in Table 5 (page 17).

Emphasis has been put on the damage to European Wildlife sites, but to reach these sites visitors have to use roads. The impact on local residents of the increased visitor traffic was not addressed in the last survey and has not been addressed in this one.

Creating green spaces for new housing developments will not stop people flooding to the beach and water in the summer months (6.6.3 & 7.2.9 - 7.2.17)

Mitigation (section 7)

This section is full of very strange logic; Section 7.2.8 Paragraph 2 (Page 45) claims two-thirds of people visiting a site will travel up to 3.2km to get there. However, in section 7.2.6 it claims you only have to put houses 1km away from the River Deben to stop significant visits.

Even more surprisingly it claims people will not travel 1km to the River Deben because they will be travelling to the new Country Park, location unknown but possibly to the North or North-East of Ipswich, a distance almost certainly greater than 5km. Is SCDC up to enforcing this and who is to say that this strategy will work?

Comments from Bawdsey Parish Council Continued:

An up-to-date, accurate survey is vital to show current visitor and traffic numbers on our part of the coast in the summer.

Suggested New Mitigation Statements (Section 7)

1. No new developments should be within 3km of an SPA. (Explanation: figures of 1km are too low and only cover Rivers Deben and Orwell.)

2. No new development should be visible from anywhere within an envelope up to 100m around an SPA. For example, for up to 100 meters from the bank of the River Deben it should not be possible to see any new developments (including roofs) on either side of the River. (Explanation: this report only considers the impact of people travelling from the new developments to the site. We contend that a site is also damaged if the view from these sites is altered/damaged.)

Summary:

Emphasis has been put on the damage to European Wildlife sites, but to reach these sites visitors have to use roads. The impact on local residents of the increased visitor traffic was not addressed in the last survey and has not been addressed in this one.

Creating green spaces for new housing developments will not stop people flooding to the beach and water in the summer months (6.6.3 & 7.2.9 - 7.2.17)
Martlesham Parish Council
Response to the SCDC Consultation on Updated Sustainability Appraisal and Appropriate Assessment Documents (August 2011)

MPC Response
Martlesham Parish Council is not persuaded that the redrafting of elements of the appropriate assessment and sustainability appraisals has made the Core Strategy any more acceptable or any less flawed in its argumentation. Whilst we are reassured that there is now a clear intent to meet needs in terms of ‘well managed access to green space within settlements...without detriment to wildlife and landscape character’ there is absolutely no viable demonstration or route map as to how this will actually be achieved save deferral of the issues to the Martlesham Area Action Plan. In our view this is a total abrogation of responsibility that the design of the Core Strategy drew to itself when choosing to incorporate a site specific housing allocation. In essence the Core Strategy fails to meet the test of soundness whilst it incorporates the specific Martlesham housing allocation and does not detail a tangible means of mitigation of acknowledged issues identified by the sustainability appraisal.

Consultation response items
Note: there is no order of importance in the item numbering

1. Provision of open spaces. Neither the Appropriate Assessment (AA) nor the Core Strategy contain any tangible identified land for delivering open space from the outset of the build. AA Reference or Policy: SP20

2. Site Specific Allocation & Mitigation. If the site specific housing allocation is part of the Core Strategy, then the site specific mitigations must also be part of that Core Strategy. There is at last an acknowledgement that mitigation is required but it has been dropped to the Area Action Plan to resolve.

3. Foxhall Country Park ‘...it will be important that in the MAAP open space is provided....and is available when people first start moving to the site....’ The Waste Core Strategy envisaged landfill ending in 2019 and the site being restored by 2021. Now the Market has changed and Viridor will review the situation possibly extending the mothballing. It is highly unlikely the Country Park will be established by the time the BT Martlesham development is completed. AA Reference or Policy: Page 9

4. Green Space Commitment “The developments should deliver sufficient greenspace to accommodate the increased requirement for local recreation opportunities, so that there are no impacts upon the respective SPAs. The provision of adequate public open space within strategic developments, to provide alternative recreational opportunities for routine use, will include areas which are suitable and attractive for walking dogs off leads. The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites”
Any agreement that Natural England may be deemed to have given is based on the above assumption and yet the document singularly fails to address how this will be achieved. To commit to housing land without a firm commitment to green space does not recognise the scale of the risk if such land is not made available. AA Reference or Policy: para 7.2.8

5. Deben SPA. Effect of development on Deben SPA. Improvements to the evidence base are asked for, but the lack of evidence will not delay the AA & Core Strategy.
It is essential that the Area Action Plan takes a cautious approach to locating development close to the Deben SPA whilst this evidence is gathered. A 1km "gap" is considered far too short with the excellent and well used footpaths already in existence, and the high proportion of leisure cyclists in the Martlesham area.

Summary:
Neither the Appropriate Assessment (AA) nor the Core Strategy contain any tangible identified land for delivering open space from the outset of the build.

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Response to the SCDC Consultation on Updated Sustainability Appraisal and Appropriate Assessment Documents (August 2011)

MPC Response
Martlesham Parish Council is not persuaded that the redrafting of elements of the appropriate assessment and sustainability appraisals has made the Core Strategy any more acceptable or any less flawed in its argumentation. Whilst we are reassured that there is now a clear intent to meet needs in terms of ‘well managed access to green space within settlements...without detriment to wildlife and landscape character’ there is absolutely no viable demonstration or route map as to how this will actually be achieved save deferral of the issues to the Martlesham Area Action Plan. In our view this is a total abrogation of responsibility that the design of the Core Strategy drew to itself when choosing to incorporate a site specific housing allocation. In essence the Core Strategy fails to meet the test of soundness whilst it incorporates the specific Martlesham housing allocation and does not detail a tangible means of mitigation of acknowledged issues identified by the sustainability appraisal.

Consultation response items
Note: there is no order of importance in the item numbering

1. Provision of open spaces. Neither the Appropriate Assessment (AA) nor the Core Strategy contain any tangible identified land for delivering open space from the outset of the build. AA Reference or Policy: SP20

2. Site Specific Allocation & Mitigation. If the site specific housing allocation is part of the Core Strategy, then the site specific mitigations must also be part of that Core Strategy. There is at last an acknowledgement that mitigation is required but it has been dropped to the Area Action Plan to resolve.

3. Foxhall Country Park ‘...it will be important that in the MAAP open space is provided....and is available when people first start moving to the site...’ The Waste Core Strategy envisaged landfill ending in 2019 and the site being restored by 2021. Now the Market has changed and Viridor will review the situation possibly extending the mothballing. It is highly unlikely the Country Park will be established by the time the BT Martlesham development is completed. AA Reference or Policy: Page 9

4. Green Space Commitment "The developments should deliver sufficient greenspace to accommodate the increased requirement for local recreation opportunities, so that there are no impacts upon the respective SPAs. The provision of adequate public open space within strategic developments, to provide alternative recreational opportunities for routine use, will include areas which are suitable and attractive for walking dogs off leads. The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites”

Any agreement that Natural England may be deemed to have given is based on the above assumption and yet the document singularly fails to address how this will be achieved. To commit to housing land without a firm commitment to green space does not recognise the scale of the risk if such land is not made available. AA Reference or Policy: para 7.2.8

5. Deben SPA. Effect of development on Deben SPA. Improvements to the evidence base are asked for, but the lack of evidence will not delay the AA & Core Strategy.

It is essential that the Area Action Plan takes a cautious approach to locating development close to the Deben SPA whilst this evidence is gathered. A 1km “gap” is considered far too short with the excellent and well used footpaths already in existence, and the high proportion of leisure cyclists in the Martlesham area.

Summary: ‘...it will be important that in the MAAP open space is provided....and is available when people first start moving to the site...’

The Waste Core Strategy envisaged landfill ending in 2019 and the site being restored by 2021. Now the Market has changed and Viridor will review the situation possibly extending the mothballing. It is highly unlikely the Country Park will be established by the time the BT Martlesham development is completed.
Please see below my comments and reasons for my strong objection to the allocation of 2000 homes on the land owned by BT (and others) adjacent to Adastral Park. These are based on my opinion that the Appropriate Assessment is flawed in its methodology and illogical in the conclusions it draws.

The Habitats Directive Article 6(3), contains two important requirements: (a) that any plan or project which is likely to have a significant effect on a Special Area of Conservation must be the subject of an appropriate assessment by a competent national authority; and (b) that the authority may only approve the plan or project when it has ascertained that there will be no adverse effect on the SAC. Specifically it states:-

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

It is my opinion that the August 2011 revision of the Appropriate Assessment fails to demonstrate that the BT site allocation will not have an adverse effect on the SACs in the surrounding area for the following reasons:-

1) The previous version of the AA took into account the data contained in the survey of visitors to the Sandlings area to the NE of Woodbridge. This looked at visitor numbers from a wide area, including for example Ipswich, the IPA portion of SCDC, and the Felixstowe area, and drew conclusions about the degree of impact on that Sandlings area. However the AA went on to draw conclusions about the impact, or otherwise, of the proposed developments (including the BT site) on the SACs in the vicinity of the BT site, despite the fact that there was no data to justify this conclusion, and was based erroneous information about car parking for members of the public at the locations which would give access to the Deben SACs (the AA said there was none, whereas in fact there is at all the relevant locations).

2) The revised August version of the AA has now corrected these errors and makes reference to the small scale study carried out by NANT (which shows that there will be a risk that increased visitor numbers will have an adverse effect on the SAC). However these revisions to the document do not address the continuing fundamental issue that no substantive data is available to assess the degree of risk. Para 9.2 points to the need for further studies.

3) The previous version used the absence of car parking as part of its justification for saying there was little risk. Now that the latest document states (somewhat grudgingly) that there IS in fact car parking it cannot logically follow that the risk is now no greater than was stated in the previous version.

4) The August AA specifically says in para 7.2.6:-

"Further mitigation to reduce harm, as described in paragraphs 7.2.7 - 7.2.15 below remains to be required. A planning application Appropriate Assessment would be needed to look at site- and plan-specific issues. Natural England advised in its email of 15th February 2011 to Suffolk Coastal District that it believes 'that any adverse effects on N2K sites could be mitigated by the use of planning conditions/obligations/legal agreements (S106) to allow us to conclude no adverse effect on integrity. Suitable strategies are detailed in our letter to SCDC of 12 February 2010 which could be employed following AA at project level."

The AA also states in para 7.2.8

"The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites"

At the present time there is no information publicly available to demonstrate that there ARE any viable and effective mitigation solutions which are realistically deliverable in the timescale to meet the requirement set out in para 7.2.8.

The amount of green space available on the BT site will be very limited for many years due to the mineral extraction programme. The only other nearby site which has been mentioned is the conversion of the Foxhall landfill site into a country park. This site has just completed a programme to line out and prepare capacity for another 300,000 cubic metres. However the current rate of inert landfill being deposited is some 2000 tons pa, so it clear that unless the rate of landfill is very dramatically changed it will not be available for at least a generation and probably much longer. And even when it is completed and capped off it will require several years to settle and be made safe before public access can be considered. Therefore to even suggest that this site is likely to address the area's need for diversionary green space with the timeframe of the LDF is misleading. The final suggestion that the open space be linked to the PRoW in the area ignores the fact that most of the PRoWs in the area (and certainly those most likely to be attractive to residents on the BT site) go towards the SACs and so will serve only to increase visitor numbers. One final point on this subject is that the proposal is that use of cycles will be encouraged (with dedicated cycle storage etc). This, in turn will encourage residents to cycle down to the Deben (which is about 10 minutes away via an existing bridleway).

Given that the LDF is very site specific with respect to the BT land, and that this is already the subject of two planning applications, it must be presumed that, if the LDF is approved in its present form, the BT development will go ahead.

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For the Council to suggest otherwise would be startlingly disingenuous. Therefore if the AA is approved (and inter alia the LDF) it is my strong view that any mitigation measures should be firmly identified and evaluated as being effective before the LDF is approved. If the council fails to do this then there is a very real risk that building will go ahead but the mitigation measures will not materialise - either because none can be identified, or cannot be delivered within the timescales set out in para 7.2.8 of the AA.

5) If, despite all the reservations and concerns expressed above, SCDC go ahead and approve the LDF and subsequently take the BT application to planning committee, SCDC should publicly assure its residents that approval WILL NOT be given unless and until substantive and deliverable mitigation measures are identified which are a) evidence based using real visitor data and b) deliverable in the timescales set out in the AA. These are issues which should not be swept under the carpet for later assessment as by then it will be too late to reverse any consents given.

Summary:
At the present time there is no information publicly available to demonstrate that there ARE any viable and effective mitigation solutions which are realistically deliverable in the timescale to meet the requirement set out in para 7.2.8. The amount of green space available on the BT site will be very limited for many years due to the mineral extraction programme. The only other nearby site which has been mentioned is the conversion of the Foxhall landfill site into a country park. However, this site is unlikely to come forward in the required timeframe.
4049   Object
6 - Assessment of Each Policy   6.6: Policy SP17 (Green Space)

Respondent: Mrs Jennifer Egan [329]   Agent: N/A

Full Text:

I OBJECT to the findings in the revised AA and SA dated August 2011

The issues identified in my previous consultation responses have not be addressed by the revisions in the AA and SA

In addition, the AA is still giving inappropriate weight to out of date and irrelevant data

The South Sandlings Survey and the Deben Visitor Survey have both been acknowledged but then ignored

A new Country Park is going to go where? and at a cost of what? no site has been identified or costed and there is no
evidence that if will ever materialise

The LDF should be returned to cabinet for further debate

Summary: A new Country Park is going to go where? and at a cost of what? no site has been identified or costed and there is no
evidence that if will ever materialise

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Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
The revised Appropriate Assessment and Sustainability Assessment dated August 2011 have not satisfied my objection to the housing policies in the LDF. The mitigation proposals include a country park but no proposed location which makes its effectiveness questionable or commitment to provide the facility.

I strongly object to the policy of allocating such a large amount of housing to the Eastern Ipswich Plan Area and in particular to the Adastral Park site.

Full Text:

Summary:
The mitigation proposals include a country park but no proposed location which makes its effectiveness questionable or commitment to provide the facility.
I wish to OBJECT to the findings in the revised Appropriate Assessment and Sustainability Appraisal.

Concerns raised by objectors have not been dealt with by the revised AA or SA.

New information provided by the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but subsequently ignored.

The AA continues to give inappropriate weight to out of date and inappropriate data.

With reference to the 'new country park' in the 'suite of mitigation measures' there is no evidence that this would materialise, no site has been identified or costed.

I REMAIN APPALLED AT THE LACK OF AWARENESS IN THE LOCAL POPULATION AT THE PROPOSED DEVELOPMENT AT MARTLESHAM. AS A RESIDENT OF WOODBRIDGE I CONTINUALLY MEET PEOPLE WHO HAVE NOT HEARD ABOUT THESE PLANS. THIS MAKES A MOKERY OF ANY SO CALLED PUBLIC CONSULTATION. THE COUNCIL HAS FAILED IN IT'S DUTY TO INFORM ITS RESIDENTS AND TAX-PAYERS OF SUCH A HUGE AND IRREVERSIBLE POTENTIAL CHANGE TO THEIR COMMUNITY.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

With reference to the 'new country park' in the 'suite of mitigation measures' there is no evidence that this would materialise, no site has been identified or costed.
Full Text:

Please see below my comments and reasons for my strong objection to the allocation of 2000 homes on the land adjacent to Adastral Park. In my view, no effective case has been made for building a new town in this location. I have expressed my views about this in detailed responses to previous consultations and my objections previously expressed still stand. My comments in response to this latest round of consultation are summarised below.

CONSULTATION PROCESS

Firstly, having looked at your current online consultation response system, it seems to me designed to assist analysis (which is useful), but very complex and time-consuming for members of the public wishing to make their views known. I had not realised, until today, that the only alternative method you offer is representation by post. Since I am now unable to active that by your deadline, I am requesting that you treat this email as equivalent to a letter sent by post. My full contact details are supplied below.

I'm not sure why you decided not to offer an option for reply by email. A cynic might think you were trying to put barriers in the way of people sending responses - your process seems designed to put people off! You will need to beware of drawing false conclusions that there are fewer objections now than before. If you make the response system complicated, people will be put off, but it doesn't mean they are no longer objecting to the allocation of 2000 houses on that site.

APPROPRIATE ASSESSMENT

It is apparent that the original Appropriate Assessment contained errors and omissions and that further research is still required to understand the full picture. However, producing a revised document and then carrying on as before is not good enough, because all the conclusions that flowed from the inaccurate assessment have been undermined. Arguments that were made on this topic by many members of the public in response to earlier rounds of consultation are valid but are being ignored. It is apparent that the Council is keen to proceed with its original plan - great emphasis is placed on the length of time you have been working on it, as though this justifies the outcome. When evidence that forms the foundation for an argument is undermined, it is necessary to go back to first base and examine all the options which were originally available, based on the new improved evidence.

In my view, proceeding with the housing allocation near Adastral Park will have a very negative impact on the Deben Estuary protected areas and there is no clear and effective plan to mitigate it effectively. It is no good leaving these things to chance in the hope that someone will magic something out of the bag at some future date. If you are planning to create a new town in a currently rural location, you must make specific provision for the necessary mitigation on the surrounding environment, although in my view, no matter what is provided, people will still be drawn to the River Deben estuary. Provision of mitigating green spaces requires specific locations (after all the strategy includes a specific allocation for the biggest allocation of housing), specific funding and proper evaluation to show that the mitigation will be effective. I still do not see where and when a new country park is to be created and am aware that the Foxall landfill site would not be available for that purpose within the lifetime of the current LDF.

I believe that the evidence on which the original decision to allocate 2000 houses on this site was flawed and nothing has changed that situation to date. On that basis, I object.

Summary:

I still do not see where and when a new country park is to be created and am aware that the Foxall landfill site would not be available for that purpose within the lifetime of the current LDF.

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None

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I object to the findings in the revised AA and SA dated August 2011. I have written previously several times stating my objections. These have still not been addressed by the revisions in the AA and SA. The so-called provision of a country park in no way mitigates against the wholesale destruction of a large area of countryside, and the subsuming of a small riverside village into a suburb.

I therefore request that the LDF should be debated further, taking into consideration new data which has been supplied e.g. the South Sandlings Survey and the Deben Visitor Survey.

Summary:
The so-called provision of a country park in no way mitigates against the wholesale destruction of a large area of countryside, and the subsuming of a small riverside village into a suburb.

Change to Plan

Full Text: I object to the findings in the revised AA and SA dated August 2011. I have written previously several times stating my objections. These have still not been addressed by the revisions in the AA and SA. The so-called provision of a country park in no way mitigates against the wholesale destruction of a large area of countryside, and the subsuming of a small riverside village into a suburb.

Summary: The so-called provision of a country park in no way mitigates against the wholesale destruction of a large area of countryside, and the subsuming of a small riverside village into a suburb.

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Summary: The so-called provision of a country park in no way mitigates against the wholesale destruction of a large area of countryside, and the subsuming of a small riverside village into a suburb.
We wish to make the following comments.

1. It would appear that Suffolk Coastal has already ignored public opinion and government legislation and designated the Grade 1 farmland adjacent to Treetops as a 'site identified as sustainable for housing' - Ref. Walton Green.co.uk
   a) This directly contravenes existing government guidance which states that Grade 1 farmland should not be built on:
      Planning Policy Statement 7 (PPS7): Sustainable Development in rural Areas - paras 28 and 29
      Securing the Future - Delivering UK Sustainable Development Strategy - chapter 5
      A Better Quality of Life
      The Countryside - Environmental Quality and Economic and social Development - paras 2.17 and 2.18
   b) Having contacted the prime minister and our local MP we also have it on good authority that it may contravene the forthcoming National Planning Policy Framework due in April 2012 which will contain sustainable planning guidance relating to rural areas and the preservation of prime farmland.
   c) Being as it is now estimated that only 5% of Britain's farmland is designated Grade 1 why has Suffolk Coastal identified its only areas of Grade 1 farmland as 'sustainable for housing'?  
   d) This goes against the Felixstowe Town Council proposal to 'take a strategic approach, avoiding prime agricultural land where possible'.
   e) This also contravenes your own Strategic Policy SP1 - Sustainable development, section 11 - 'to conserve soil resources and quality.  
   f) And goes against Strategic Policy 21 'whilst preserving as far as possible prime agricultural land for essential food production'.

We would therefore ask you to reconsider this designation.

2. We support the element of Strategic Policy SP21 - Felixstowe 'Expansion of the retail, service and other facilities available within the town centre will be supported to meet the needs of the whole population both resident and visitor' and Strategic Policy SP6 - Regeneration 'The town centres where concern exists over the impact of out-of-centre stores'.
   a) Development of our town centre is crucial to Felixstowe. Whilst Suffolk Coastal may have had a lower percentage of vacant town centre units than other areas of Suffolk in 2005/6 our town centre now suggests otherwise. Development is crucial.
   b) As such we strongly object to any proposals for another supermarket in Felixstowe. We are already served by Morrisons, Solar and Lidl as well as Iceland and Tesco in the town centre. None of these is overcrowded.
   c) The small shops in Walton are well used and appreciated by the locals. Under Strategic Policy SP21 they should be preserved and protected.

We would therefore ask you to consider these points from your own Core Strategy should any planning applications for a supermarket be made.

3. We support the proposal for areas of open space for recreational exercise: 'such open space should be developed in the context of habitat creation, creating physical corridors or stepping stones' - 1.2 Likely significant effects of core strategy policies and mitigation required.
   a) there are insufficient park/recreational areas in Felixstowe for the present number of residents.
   b) Additional allotments are required.

Should you still wish to consider prime agricultural land as suitable for development we would ask you to consider either of the above options for its development.

Summary:

a) there are insufficient park/recreational areas in Felixstowe for the present number of residents.

b) Additional allotments are required.

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Parag 7.1.1 states: The aim of mitigation is to reduce impacts until they no longer have an adverse effect upon the integrity of European sites. The preferred solution is to avoid proposing elements of the plan which would have an adverse effect, followed by a solution to permit the impacts but carry out measures which will reduce the impacts to an acceptable level.

* Please correct your grammar: "...have an adverse affect upon..." should read: "...have an adverse effect upon...".
* Please define "...reduce the impacts to an acceptable level."

Summary: Parag 7.1.1 states: The aim of mitigation is to reduce impacts until they no longer have an adverse effect upon the integrity of European sites. The preferred solution is to avoid proposing elements of the plan which would have an adverse effect, followed by a solution to permit the impacts but carry out measures which will reduce the impacts to an acceptable level.

* Please correct your grammar: "...have an adverse affect upon..." should read: "...have an adverse effect upon...".
* Please define "...reduce the impacts to an acceptable level."
Appropriate Assessment for Core Strategy (August 2011)

3859 Object

7 - Mitigation 7.1: Introduction to Mitigation

Respondent: Mr Jonathan Hopper [2575]  Agent: N/A

Full Text:
* Please correct your grammar: "...have an adverse affect upon..." should read: "...have an adverse effect upon...":
* Please define "...reduce the impacts to an acceptable level."

Summary:
* Please correct your grammar: "...have an adverse affect upon..." should read: "...have an adverse effect upon...":
* Please define "...reduce the impacts to an acceptable level."

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* Please correct your grammar: "...have an adverse affect upon..." should read: "...have an adverse effect upon...".
* Please define "...reduce the impacts to an acceptable level."
**Appropriate Assessment for Core Strategy (August 2011)**

**Object**

7 - Mitigation

7.1: Introduction to Mitigation

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**Respondent:** Miss Hannah Hopper [2577]  
**Agent:** N/A

**Full Text:**

* Please correct your grammar: "...have an adverse affect upon..." should read: "...have an adverse effect upon...".

* Please define "...reduce the impacts to an acceptable level."

**Summary:**

* Please correct your grammar: "...have an adverse affect upon..." should read: "...have an adverse effect upon...".

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**Attachments:**

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Mitigation measures include a new country park but no site has been identified or costed.

Summary:
Mitigation measures include a new country park but no site has been identified or costed.

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The Foxburrow Farm 200-caravan store was denied planning permission on appeal on March 15th 2011. The grounds were very simple: material harm to the predominately rural character and appearance of the surrounding countryside, diminishing its innate essence.

This site is literally over the lane from the site under consideration.

That planning inspector could see what the planning inspector's going to see in relation to this plan.

Today -- 13th October 2011 -- a windfarm was refused planning on the same site.

Mitigation cannot make too many houses in the wrong place go away.

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This site is literally over the lane from the site under consideration.

That planning inspector could see what the planning inspector's going to see in relation to this plan.

Today -- 13th October 2011 -- a windfarm was refused planning on the same site.

Mitigation cannot make too many houses in the wrong place go away.
This document is full of pseudo-scientific statistics that do nothing but conceal facts. For instance, it is clearly absurd to argue that you can place thousands of houses between Martlesham and Waldringfield and this will have no impact on the River Deben because percentage wise this is a small fraction of the population of Ipswich.

This point is finally conceded in Section 5.6.7 (page 26) but no attempt is made to recalculate the tiny figures presented in Table 5 (page 17).

Emphasis has been put on the damage to European Wildlife sites, but to reach these sites visitors have to use roads. The impact on local residents of the increased visitor traffic was not addressed in the last survey and has not been addressed in this one.

Creating green spaces for new housing developments will not stop people flooding to the beach and water in the summer months (6.6.3 & 7.2.9 - 7.2.17)

Mitigation (section 7)
This section is full of very strange logic; Section 7.2.8 Paragraph 2 (Page 45) claims two-thirds of people visiting a site will travel up to 3.2km to get there. However, in section 7.2.6 it claims you only have to put houses 1km away from the River Deben to stop significant visits.

Even more surprisingly it claims people will not travel 1km to the River Deben because they will be travelling to the new Country Park, location unknown but possibly to the North or North-East of Ipswich, a distance almost certainly greater than 5km. Is SCDC up to enforcing this and who is to say that this strategy will work?

Comments from Bawdsey Parish Council Continued:
An up-to-date, accurate survey is vital to show current visitor and traffic numbers on our part of the coast in the summer.

Suggested New Mitigation Statements (Section 7)
1. No new developments should be within 3km of an SPA. (Explanation: figures of 1km are too low and only cover Rivers Deben and Orwell.)
2. No new development should be visible from anywhere within an envelope up to 100m around an SPA. For example, for up to 100 meters from the bank of the River Deben it should not be possible to see any new developments (including roofs) on either side of the River. (Explanation: this report only considers the impact of people travelling from the new developments to the site. We contend that a site is also damaged if the view from these sites is altered/damaged.)

Summary:
Suggested New Mitigation Statements (Section 7)
1. No new developments should be within 3km of an SPA. (Explanation: figures of 1km are too low and only cover Rivers Deben and Orwell.)
2. No new development should be visible from anywhere within an envelope up to 100m around an SPA. For example, for up to 100 meters from the bank of the River Deben it should not be possible to see any new developments (including roofs) on either side of the River. (Explanation: this report only considers the impact of people travelling from the new developments to the site. We contend that a site is also damaged if the view from these sites is altered/damaged.)
I think the measures proposed are totally unrealistic and are based on wishful thinking. Because the Deben is more than 1k away and will not be affected by dog walkers is absurd.
Martlesham Parish Council Response to the SCDC Consultation on Updated Sustainability Appraisal and Appropriate Assessment Documents (August 2011)

MPC Response

Martlesham Parish Council is not persuaded that the redrafting of elements of the appropriate assessment and sustainability appraisals has made the Core Strategy any more acceptable or any less flawed in its argumentation. Whilst we are reassured that there is now a clear intent to meet needs in terms of ‘well managed access to green space within settlements...without detriment to wildlife and landscape character’ there is absolutely no viable demonstration or route map as to how this will actually be achieved save deferral of the issues to the Martlesham Area Action Plan. In our view this is a total abrogation of responsibility that the design of the Core Strategy drew to itself when choosing to incorporate a site specific housing allocation. In essence the Core Strategy fails to meet the test of soundness whilst it incorporates the specific Martlesham housing allocation and does not detail a tangible means of mitigation of acknowledged issues identified by the sustainability appraisal.

Consultation response items

Note: there is no order of importance in the item numbering

1. Provision of open spaces. Neither the Appropriate Assessment (AA) nor the Core Strategy contain any tangible identified land for delivering open space from the outset of the build. AA Reference or Policy: SP20

2. Site Specific Allocation & Mitigation. If the site specific housing allocation is part of the Core Strategy, then the site specific mitigations must also be part of that Core Strategy. There is at last an acknowledgement that mitigation is required but it has been dropped to the Area Action Plan to resolve.

3. Foxhall Country Park ‘...it will be important that in the MAAP open space is provided....and is available when people first start moving to the site...’ The Waste Core Strategy envisaged landfill ending in 2019 and the site being restored by 2021. Now the Market has changed and Viridor will review the situation possibly extending the mothballing. It is highly unlikely the Country Park will be established by the time the BT Martlesham development is completed. AA Reference or Policy: Page 9

4. Green Space Commitment “The developments should deliver sufficient greenspace to accommodate the increased requirement for local recreation opportunities, so that there are no impacts upon the respective SPAs. The provision of adequate public open space within strategic developments, to provide alternative recreational opportunities for routine use, will include areas which are suitable and attractive for walking dogs off leads. The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites” Any agreement that Natural England may be deemed to have given is based on the above assumption and yet the document singularly fails to address how this will be achieved. To commit to housing land without a firm commitment to green space does not recognise the scale of the risk if such land is not made available. AA Reference or Policy: para 7.2.8

5. Deben SPA. Effect of development on Deben SPA. Improvements to the evidence base are asked for, but the lack of evidence will not delay the AA & Core Strategy. It is essential that the Area Action Plan takes a cautious approach to locating development close to the Deben SPA whilst this evidence is gathered. A 1km “gap” is considered far too short with the excellent and well used footpaths already in existence, and the high proportion of leisure cyclists in the Martlesham area.

Summary: If the site specific housing allocation is part of the Core Strategy, then the site specific mitigations must also be part of that Core Strategy. There is at last an acknowledgement that mitigation is required but it has been dropped to the Area Action Plan to resolve.

Change to Plan

Legal? Not Specified
Sound? Not Specified
Duty to Cooperate? Not Specified
Soundness Tests None
I object to the findings of the August 2011 Appropriate Assessment and Sustainability Appraisal. The Appropriate Assessment give inappropriate weight to out of date and irrelevant data. While the South Sandlings Survey and the Deben Visitor Survey have been acknowledged, their findings have not been taken into account in the conclusion.

A new country park is an essential piece of the mitigation measures, but no site has been identified or costed. This needs to be included as part of the plan otherwise.

The issues identified in my previous consultation responses have not been addressed by the revisions in the Appropriate Assessment and Sustainability Appraisal.

In particular, the Sustainability Appraisal continues to make reference to the "strategic employment site that is also considered for expansion". This is a fallacy that I have pointed out on numerous occasions in previous consultations. BT does not need the site at Martlesham any more. Employment has declined because technology means that many of the jobs are not needed. This is not because there was insufficient housing locally. BT continue to over count the number of employment opportunities on the site as part of a way of trying to add evidence for their case. This is by tricks such as saying that their employees are based at Adastral park in their contract, when actually they work out of another site most of the time. There should be a legal obligation for employment numbers before a certain tranche of houses are built. I am an employee of a small company at Innovation Martlesham. We chose the offices because we got a deal on cheap rent, not because of the touted benefits of co-location which haven't actually materialised. Perhaps it would be better to talk to people (like me) who actually do innovation, rather than those senior managers who talk about innovation. It is astonishing that a commercial organisation is able to profiteer in this way while failing to run their own business properly.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Summary:
A new country park is an essential piece of the mitigation measures, but no site has been identified or costed. This needs to be included as part of the plan.
I am writing to you because I OBJECT to the findings listed in the revised AA and SA of August 2011. You have still to address issues raised in my earlier responses to your consultations and which are not addressed by the revisions in the AA and SA.

The AA still gives inappropriate weight to out of date and inappropriate data.

New data, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions.

An essential piece of the so called "suite of mitigation measures" is a new country park. No site has been identified or costed - there is no evidence that this will materialise.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

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**Summary:** An essential piece of the so called "suite of mitigation measures" is a new country park. No site has been identified or costed - there is no evidence that this will materialise.
4042 Object

7 - Mitigation 7.1: Introduction to Mitigation

Respondent: Mrs Helga Ballam [269] Agent: N/A

Full Text: I wish to OBJECT to the findings in the revised AA and SA dated August 2011.

The revisions in the AA and SA have not addressed the issues identified in my previous consultation responses.

Inappropriate weight is still given in the AA to out of date and irrelevant data. Data collected recently and more importantly, locally, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions.

The "suite of mitigation measures" includes a new country park. No site has been identified or examined for suitability either geographically or economically and there is no evidence that this can be provided to attempt to mitigate against the damage done to the sensitive locality.

On the basis of these revisions the LDF should be returned to the cabinet for further debate and it should not be overlooked that insufficient publicity was given to the consultation opportunity on these revisions, and also the impediment placed in the way of the public being able to respond conveniently by the extremely confusing on-line process. The time deadline was also completely misleading.

Summary: The "suite of mitigation measures" includes a new country park. No site has been identified or examined for suitability either geographically or economically and there is no evidence that this can be provided to attempt to mitigate against the damage done to the sensitive locality.

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Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Consultation Response

I have objected on two previous occasions to the LDF and the further revisions offered in the current consultation (Area Assessment and Sustainability Appraisal) go nowhere to addressing my previous concerns, ie my previous objections remain in place.

The current LDF proposals will not achieve the demographic balance required to keep the rural and coastal areas sustainable. Furthermore the proposals continue to provide a strategic roadblock to the overall access to the area by overloading the Orwell Bridge and effectively destroying a national economic infrastructure capability to the port of Felixstowe, tourism, and the business that rely on free movement of traffic in the area.

The council has not taken due account of additional information such as the South Sandling Survey and the Deben Visitor Survey in preparing the Area Assessment and has instead given undue emphasis to out of date and inappropriate data.

The suite of mitigation measures offered is not credible. Key objections to the LDF should not be evaded by introducing the concept of a new country park. Given that no site or costing have been identified this mythical device should not be given any credibility as a mitigation measure for such a sensitive area.

The revisions offered in the consultation should not be accepted and therefore returned to Cabinet for reconsideration.

END

Summary:
The suite of mitigation measures offered is not credible. Key objections to the LDF should not be evaded by introducing the concept of a new country park. Given that no site or costing have been identified this mythical device should not be given any credibility as a mitigation measure for such a sensitive area.
WE OBJECT to the findings in the revised AA and SA dated August 2011.

The issues identified in my previous consultation responses have not been addressed by the revisions in the AA and SA.

In addition, the AA still gives inappropriate weight to out of date and irrelevant data.
New data, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions.
An essential piece of the so called "suite of mitigation measures" is a new country park. No site has been identified or costed - there is no evidence that this will materialise.
On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Mr & Mrs D Cutler Waldringfield

An essential piece of the so called "suite of mitigation measures" is a new country park. No site has been identified or costed - there is no evidence that this will materialise.

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I OBJECT to the findings in the revised AA and SA - August 2011.

On previous related consultations I have submitted issues but these have not been addressed by these revisions in the AA and SA.

The data being quoted is still inaccurate - and worse, is now very out of date.

Please include recent detailed studies with more accurate information such as the Deben Visitor Survey and South Sandlings Survey within the conclusions.

The LDF requires much further debate, to ensure that it adequately protects environmentally sensitive, unique and internationally protected sites, and does not merely pretend to cover this all with some sort of unproven ‘mitigation’.

Regards

Margaret

M Wilson

5 Lancaster Drive

IP5 3TJ

The LDF requires much further debate, to ensure that it adequately protects environmentally sensitive, unique and internationally protected sites, and does not merely pretend to cover this all with some sort of unproven ‘mitigation’.

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments:

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To whom it may concern

Firstly I would like to say I have had enormous problems trying to navigate my way into your online complaints/objection procedure as I know others have as well. Is this intentional. I was given a direct email link and was unable to use this development.policy@suffolkcoastal.gov.uk, "this page cannot be displayed".

I OBJECT to the findings in the revised AA and SA dated August 2011.

The issues identified in my previous consultation responses have not been addressed by the revisions in the AA and SA.

In addition, the AA still gives inappropriate weight to out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey, which I and several others took many hours in the freezing cold talking to visitors and collecting information about the wild life and habitats of the Deben have been acknowledged, but then ignored in the conclusions.

An essential piece of the so called "suite of mitigation measures" is a new country park. No site has been identified or costed - there is no evidence that this will materialise.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Finally I would like to point out, there are numerous bridlepaths running around and through the BT land. As you probably know there are very few places for horse riders to be able to get off the roads. Under no circumstances would I want to see the loss of any of these paths, or the re direction nor would I wish to see the surfaces tarmac or signs being displayed no cantering etc etc.

Summary:

An essential piece of the so called "suite of mitigation measures" is a new country park. No site has been identified or costed - there is no evidence that this will materialise.
I have read and attempted to understand the revised LDF/Core Strategy Appropriate Assessment and Sustainability Appraisal but find contradictory information on the "measures of mitigation" and various flaws and inconsistencies in the reasoning. On this basis I am objecting to the recent (August ‘11) finding in the revised AA and SA.
Comment

With regard to the above consultation, I make the following comments:

Sustainability Appraisal
I am sure this will be a valuable document but I am not expert enough to ascertain how correct it is but suggest that before it is submitted eventually to the Planning Inspectorate an independent unbiased person/company are given the opportunity to ensure it is correct. Only having a November 2010 Core Strategy, it is difficult and time consuming to check whether or not the corrections and deletions have been made.

Appropriate Assessment
I believe that had it not been for Mr Buxton’s letter on behalf of NANT dated 8th July which highlighted inaccurate information and inconsistencies together with NANTS Visitor Survey which was conducted over 16 days in April and May, and the pertinent comments by Simon Cairns of SPS, the Appropriate Assessment would have been submitted to the Inspector as first published.

This new version - August 2011 - has as a result been modified, updated, increased to 54 pages in 2011 from 34 in 2009 but I feel there are still many flaws to many of the sections where detail is glossed over without enough up to date evidence or fact. The changes are minor and considering it is seven years since it was first drawn up and with all the various input of various bodies and Natural England national visitor survey and NANT’s Visitor Survey earlier this year, I am surprised at how little the revised AA document has changed.

The revised version includes additional paragraphs/sections, changes to various tables and references to areas but these bear little relationship to Suffolk Coastal and the pressure on valuable European protected sites that huge increases in tourists and local dog walkers, bird watchers etc. to these sites, are making.

I suggest too, that instead of quoting Dorset as a study area of heathland, you conduct a study here in Suffolk to see what the residual disturbance of birds caused by local people engaged in low key recreational activities on European sites is, it would make it a more credible document. Afterall, visitor numbers to these areas along the River Deben and River Orwell have increased enormously.

Mitigation for Policy SP2 Housing numbers
In 7.2.10, 7.2.11 and 7.2.15 “A new Country Park or similar” is mentioned. It would be helpful if you could indicate where the Country Park is going to be (one presumes on the Foxhall Tip but this is not confirmed) and also where “similar” high quality provision is going to be in the Ipswich Policy Area. This Peninsula and the surrounds of Ipswich do not have hundreds of spares acres waiting to be turned into “green space”. You mention three Country Parks 7.2.13 throughout the County but they all provide Park/green space areas of 13ha. x2 or158ha. This part of Suffolk do not possess that amount of spare land to offer areas for dog walkers away from heathland sites, capable of offering visitor parking, WCs etc. and as a result is a laughable idea and in not way will be possible especially with the present economic climate where funding is in short supply. I cannot see this provision occurring to form a substantial part of your future mitigation programme to preserve the European sites etc., and all that is so valuable to Suffolk Coastal’s unique habitat in providing much needed greenspace for a huge Housing Development at Adastral Park.

I see no reference to mitigation to the AONB areas bordering the Rivers Deben and Orwell. The impact that 1,440 dwellings close by will impact on the vital habitat and estuaries close to Felixstowe and the Trimleys.

I feel this section on Mitigation is very “woolley” in the revised AA.

I personally have noted in the last twenty five years a huge decline in wild birds. For many years flocks of geese grazed on the fields to the right of my cottage and hundreds of lapwings grazed on the fields to my left. Now neither birds graze. Fieldfares and the lark too have disappeared - the volume of traffic, diesel fumes, increase of buildings, dog walkers, combined with “set aside”, which I feel did more damage than good to our natural habitat, has I feel, contributed to the decline and the proposal of 2000 plus dwellings at Adastral Park and 1,440 dwellings down the road at Trimley/Felixstowe four miles away along with all the extra people, cars etc., will totally destroy any bird and wild life, fauna and flora in this area and give a totally urban look to the District. The Mitigation measures suggested will do little to preserve what we at present have, on the AONB, Triple SI and Ramsar sites.

Conclusion
Despite the fact that several “bodies” have brought about a revision of the AA, I am still not convinced that there is any real change backed up by up-to-date current evidence in the August 2011 documents compared with those in September 2009 version.

The integrity of the Deben Estuary will be affected by the proposals for 2000 plus dwellings at Adastral Park and 1440 dwellings further down the road and the proposed mitigation measures mentioned are inadequate and unproven and will result in a serious adverse effect on the Deben Estuary.

Summary:
I see no reference to mitigation to the AONB areas bordering the Rivers Deben and Orwell. The impact that 1,440 dwellings close by will impact on the vital habitat and estuaries close to Felixstowe and the Trimleys. I feel this section on Mitigation is very “woolley” in the revised AA.

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### Appropriate Assessment for Core Strategy (August 2011)

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Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I wish to register my OBJECTION to the Appropriate Assessment (AA) & Sustainability Appraisal (SA) documents (August 2011) which are being used to support SCDC’s current LDF draft proposal.

My main concerns are related to the East of Ipswich Plan Area and SP20 and the way SCDC has conducted itself in the development of the LDF.

The reasons for my objection are that the AA & SA documents, and therefore the LDF proposal, are:

1) Incomplete - important mitigation measures (e.g. provision of a Country Park near Martlesham) have not been clearly identified and costed, and by the report’s own admission may not be implemented or funded within the timescale of the proposed LDF. As a consequence, such mitigation must be deemed invalid and should be struck from the report.

2) Inconsistent - important data has been acknowledged (e.g. South Sandlings Survey) but ignored in any conclusions, this leaves the reader to form the view that the report is biased and has been formulated in such a way as to promote the proposed LDF.

The LDF proposal and outstanding BT application for Adastral Park (and surrounding land) are inextricably linked. This relationship has been always denied by SCDC since BT’s original application in 2008, but Andy Smith (SCDC Planning Portfolio holder) finally admitted it at the public Scrutiny Meeting held on 17th Jan 2011. This statement has never been widely reported or officially minuted only those present at the meeting heard his response which leads one to believe the SCDC is embarrassed by the link.

I therefore believe that all public consultations since and including 2008 have therefore misled the public in SCDC consultation’s terms of reference.

The AA or SA refer to the increased traffic load, congestion and pollution but don’t take into account the major changes to road infrastructure (ie. A12 at Martlesham) which are planned. Old survey data is used and no account taken of the increased heavy loads using A12 if Sizewell C plans go ahead.

The conversion of 3 roundabouts within half mile of BT Adastral Park entrance to traffic ligh controlled crossroads will cause an increase of toxic pollution to Martlesham residents due to an increase in stationary traffic. These new crossroads will be the ONLY CROSSROADS ON THE A12 BETWEEN THE M25 AND LOWESTOFT which is an indication of how poorly thought out the new road infrastructure plans have been developed for such an important arterial road.

Traffic lights can fail and therefore halt traffic but roundabouts always allow continuous traffic flow. The use of traffic light controlled junctions is a sign of SCDC’s desperation to impose urbanisation on rural and semi-rural villages to accommodate BT. This can be perceived as bias to one local employer.

SCDC make great play of the sustainability aspects of co-siting a single large housing development (2000+ homes) next to BT Adastral Park but the argument for this approach does not hold up to scrutiny for the following reasons:

1) It will not reduce traffic as not everyone living in the new development will work at Adastral Park and with extra visitors will in fact increase the traffic movements in the area.

2) BT has stated that it MAY only develop its site when market conditions are right but it wants the housing development NOW (ie. NO guarantee of jobs but pressure being applied to guarantee an increase in land value/profit for BT) at the expense of environment to the existing communities of Martlesham, Kesgrave, Waldringfield, Kirton, and Brightwell.

I believe that AAS and SA need further work and consequently that the LDF should be passed back to the full Council for further debate.

Summary:

The AA & SA are incomplete and inconsistent, with essential mitigation measures (e.g. Country Park near Martlesham) unlikely be implemented in the timescale of the LDF. Furthermore the documents could be viewed as biased and formulated to promote the LDF without giving a balanced viewpoint.

I believe that AA and SA need further work and consequently that the LDF should be passed back to the full Council for
## 4171 Object

| 7 - Mitigation | 7.1: Introduction to Mitigation |

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The AA & SA are incomplete and inconsistent, with essential mitigation measures (e.g. Country Park near Martlesham) unlikely be implemented in the timescale of the LDF. Furthermore the documents could be viewed as biased and formulated to promote the LDF without giving a balanced viewpoint.

I believe that AA and SA need further work and consequently that the LDF should be passed back to the Full Council for further debate.

Full Response

I wish to register my OBJECTION to the Appropriate Assessment (AA) & Sustainability Appraisal (SA) documents (August 2011) which are being used to support SCDCs current LDF draft proposal.

My main concerns are related to the East of Ipswich Plan Area and SP20 and the way SCDC has conducted itself in the development of the LDF.

The reasons for my objection are that the AA & SA documents, and therefore the LDF proposal, are:
1) Incomplete - important mitigation measures (e.g. provision of a Country Park near Martlesham) have not been clearly identified and costed, and by the report's own admission may not be implemented or funded within the timescale of the proposed LDF. As a consequence, such mitigation must be deemed invalid and should be struck from the report.
2) Inconsistent - important data has been acknowledged (e.g. South Sandlings Survey) but ignored in any conclusions, this leaves the reader to form the view that the report is biased and has been formulated in such a way as to promote the proposed LDF.

The LDF proposal and outstanding BT application for Adastral Park (and surrounding land) are inextricably linked. This relationship has been always denied by SCDC since BT's original application in 2008, but Andy Smith (SCDC Planning Portfolio holder) finally admitted it at the public Scrutiny Meeting held on 17th Jan 2011. This statement has never been widely reported or officially minuted only those present at the meeting heard his response which leads one to believe the SCDC is embarrassed by the link.

I therefore believe that all public consultations since and including 2008 have therefore misled the public in SCDC consultation's terms of reference.

The AA or SA refer to the increased traffic load, congestion and pollution but don't take into account the major changes to road infrastructure (ie. A12 at Martlesham) which are planned. Old survey data is used and no account taken of the increased heavy loads using A12 if Sizewell C plans go ahead.

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Traffic lights can fail and therefore halt traffic but roundabouts always allow continuous traffic flow. The use of traffic light controlled junctions is a sign of SCDC's desperation to impose urbanisation on rural and semi-rural villages to accommodate BT. This can be perceived as bias to one local employer.

SCDC make great play of the sustainability aspects of co-siting a single large housing development (2000+ homes) next to BT Adastral Park but the argument for this approach does not hold up to scrutiny for the following reasons:
1) It will not reduce traffic as not everyone living in the new development will work at Adastral Park and with extra visitors will in fact increase the traffic movements in the area.
2) BT has stated that it MAY only develop its site when market conditions are right but it wants the housing development NOW (ie. NO guarantee of jobs but pressure being applied to guarantee an increase in land value/profit for BT) at the expense of environment to the existing communities of Martlesham, Kesgrave, Waldringfield, Kirton, and Brightwell.

I believe that AAS and SA need further work and consequently that the LDF should be passed back to the full Council for further debate.

Summary:
Incomplete - important mitigation measures (e.g. provision of a Country Park near Martlesham) have not been clearly identified and costed, and by the report's own admission may not be implemented or funded within the timescale of the proposed LDF. As a consequence, such mitigation must be deemed invalid and should be struck from the report.

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Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
### 4172 Object

| 7 - Mitigation | 7.1: Introduction to Mitigation |

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**Note:** The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I object to the findings in the revised Appropriate Assessment and Sustainability Appraisal dated August 2011. None of the issues raised in my previous consultation responses seem to have been considered and no significant changes have been made.

I am bewildered by the policy which still seeks to concentrate all of the major housing development in the South of the SCDC area and the plans to create the Adastral Park new town, which is completely at odds with all rational thinking.

The Appropriate Assessment still uses out of date data and other recent surveys such as the Deben Visitor Survey and the South Sandlings Survey have been ignored in the conclusions.

The Sustainability Appraisal should have been changed in view of the potential changes to the Core Strategy. This might have allowed for other possibilities for sustainability and in particular consideration could then have been given to a more even distribution of houses throughout the district and on overall housing numbers.

The mitigation measures including a new country park lack any sort of credibility. There is no indication of where this might be located or indeed if there is anywhere suitable in this increasingly congested part of the county.

Summary: The mitigation measures including a new country park lack any sort of credibility. There is no indication of where this might be located or indeed if there is anywhere suitable in this increasingly congested part of the county.

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Attachments: None
We are having to write as your website informs us that our email addresses do not exist (despite receiving messages on them as we write - we trust this is a problem specific to us and not a universal problem in which case your consultation process would be flawed).

We continue to object to the findings in the revised AA and SA dated August 2011. This should be taken as two objections.

The issues identified in our previous consultation responses have not been adequately addressed by the revisions in the AA and SA. Some of the data remains unreliable and recent surveys such as the Deben Visitor Survey appear to have no weight in the final analysis.

There is no specific evidence of the required mitigation measures.

The LDF should be debated further at Cabinet level.

Summary:

There is no specific evidence of the required mitigation measures.

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Attachments:
4197 Object
7 - Mitigation 7.1: Introduction to Mitigation

Respondent: Mr Martin Cottrell [2571] Agent: N/A

Full Text: I object to the findings in the above revised assessments as they do not answer previously notified objections. The Appropriate Assessment still uses out of date and irrelevant data. New information given in the South Sandlings Survey and the Deben Visitor Survey has been noted but then ignored. I understand that a new Country Park has been suggested as a mitigating factor to the high density proposed housing but no site has been identified and no costings are given.

I continue to believe that it is totally unethical for a local planning guideline to exactly match a planning application made by a private company.

On the above matters I believe that the LDF should be returned to the Cabinet for further discussion.

Summary: I understand that a new Country Park has been suggested as a mitigating factor to the high density proposed housing but no site has been identified and no costings are given.

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Attachments: None
Once again I am writing to say that I OBJECT most strongly to the proposed development at BT site, Martlesham. The scale of the development is so inappropriate.

I believe that the council's LDF is flawed and concerns expressed in previous consultations have not been addressed by the revisions in the AA and SA. The AA also still gives inappropriate weight to out of date and irrelevant data - new date e.g. South Sandlings Survey & Deben Visitor Survey have been acknowledged but ignored in the conclusions.

Re "suite of mitigation measures", a new Country Park sounds very grand, but no site has been identified or costed, so how can we be sure that years down the line it will ever materialise?

I believe that the spirit of the government's intention to allow planning to be decided at local level is not being followed as the temptations offered by a BT package are greater than the wishes of local residents - who are, lest you forget, your voters!!

The LDF must be returned to the Cabinet for further debate.

Summary:
Re "suite of mitigation measures", a new Country Park sounds very grand, but no site has been identified or costed, so how can we be sure that years down the line it will ever materialise?

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Attachments:
Revised LDF - I OBJECT to the findings on the revised AA and SA dated August 2011

The issues in my previous consultation responses have not been addressed by the revisions in the AA and SA. Also inappropriate weighting has been given in the AA to out of date and irrelevant data. New data, e.g. the South Sandlings Survey and the Deben Visitor Survey, should be considered but these have only been acknowledged then ignored.

An essential piece of the so called "suite of mitigation measures", the new country park, has neither site identified nor costing - so seems unlikely to ever materialise. I strongly suggest that the LDF should be returned to the cabinet for further debate.

Summary:
An essential piece of the so called "suite of mitigation measures", the new country park, has neither site identified nor costing - so seems unlikely to ever materialise.
Object

7 - Mitigation

7.1: Introduction to Mitigation

Respondent: Dr Patricia Shipley [498]
Agent: N/A

Full Text: Please find my objections with reference to the above Sustainability Appraisal (SA). They are largely restricted to the area proposed for development in the Martlesham Area East of Ipswich.

In summary, after due consideration of your detailed document I have failed to find your Framework Plan for this area sufficiently plausible & sufficiently consistent with science despite the claim on p57 that overall "the latest version of this policy is marginally more sustainable" Notwithstanding the undoubted need for more housing provision in the area, the desperate need for social affordable housing especially, I maintain the Plan's arguments are inadequate on all three of the required Sustainability dimensions. The main reason for this concern, I contend, is the failure to demonstrate in the report that an acceptable, rigorous and proper method and measurement scheme has been deployed before reaching conclusions. My main points to support my view now follow in more detail.

My main point refers to what I see as a crucial weakness throughout this Plan - the weaknesses in the measurement methodology used. Without sound measures, conclusions formed in this appraisal cannot be reliable. In fact, I have found no clear statement of the appraisal methodology used and its limitations. (See Section 3.1 on Method). Look, for example at item 4.4 on p40 "Assumptions and Limitations on information" where it is frankly admitted that there are instances where not supporting data, or only limited data are available to bolster the argument. For a specific illustration of this problem, and again confining my critique to the Martlesham area proposed for development to the extent of at least 2000 homes, I refer you, as an example, to the lack of any full and clear assessment in the Plan of the likely impact - of what will amount to a suburb of Woodbridge and Ipswich, a new town even - on the surrounding network of country roads, most of them narrow and potentially dangerous to increasing numbers of tourists using them - walkers, cyclists, runners, horse riders. Large farm vehicles use them all the time. Yet to quote the Traffic sub-section in the Plan's heading "Environmental Issues" on p38: "Woodbridge, Felixstowe and several settlements along the coast currently experience congestion especially during the summer". And : "The dispersed nature of Suffolk's rural population....could lead to increased demand for private travel" And "It is unreasonable to expect every new resident of the district to use public of sustainable transport all the time" We all know that suburbs have depended on the private car.

I believe these facts conflict with at least one of the "Sustainability Objectives" laid out in table 5.1 on p41, ie "To improve the health of the population overall". On the contrary, I contend that the development proposed for the area will significantly increase the risks to health and safety of those using the areas, whatever their business, and especially those who are resident here. In table 5.3 on p43 headed "Overall Compatibility of Plan Objectives with SA Objectives" I suggest that there are many conflicting objectives which remain hidden because they are not clearly spelt out, and the prioritising used has not been identified, nor its underpinning values. This may be unintentional. It at least shows a failure of consistency and good reasoning. As far as I am able to judge the method of appraisal has relied heavily on subjective opinion and anecdotes, with assumptions that remain to be strictly tested. I suggest the appraisal has not been sufficiently objective and robust. (See 3..3, p15 on who carried out the SA). The method used is not "fit for purpose", certainly not for a plan of this scale and magnitude. It is value-laden and insufficiently transparent. Does not central Government's proposed National Planning Policy Framework emphasise the use of an "evidence base"? Facts, and objectivity should trump rhetoric and the subjective, in rational, factual, evidence-based decision-making. Moreover, I have not been able to locate a robust, clear comparison and appraisal, of the full costs and benefits of alternative scenarios such as the dispersal of house building onto smaller sites, a strategy which could benefit local villages, as an alternative to building on a single big site like that of Martlesham East of Ipswich.

The environmental threats to the Deben area posed by the Plan are severe (as its "architects" recognise), with the issue unresolved of the likely full impact on the fragile Deben Estuary and AONB of the proposed Martlesham 2000+ and Felixstowe 1440 houses. The mitigation's proposed for environmental protection are wholly inadequate, however. What assurances are there that the mitigation measures proposed will work? There are not data given from a robust survey of current numbers and types of visitors to the area, regardless of the impact of future large increases in visitor numbers resulting from such large scale development. It is also difficult to comment sensibly on the economic aspects of the sustainability issues given the current grave and highly unstable economic situation. For example, will the homes sell in the current climate, the land be paid for, funds be found for the needed infrastructure, country park etc., or will there be unforeseen and unwanted consequences of hasty large-scale over-development? Once done, the damage will not be easily reversed. Further, the rationale for the claims made in the Plan for its social sustainability strike me forcibly as threadbare. Community cohesion for example is a precious commodity, increasingly so these days. But you can't parachute a ready-made community into a new and large suburban estate and spontaneously expect it to be cohesive with an identity and a "sense of place". Such cohesion takes years to grow and it does so with difficulty, requiring constant renewal, as many small town inhabitants and villages will testify. Where does the Plan address these limitations? We are crucially in need of sound balance and clarity of underlying argument. It is wrong to reduce the other sustainability issues involved to the economic based on optimistic but shaky economic predictions about the future. Above all, it should be made clear to us what kind of prioritising has taken place where conflicts of interest occur - as they, perhaps, inevitably, must.

Turning now to my final point, to the unanswered big issues, to the unanswered first questions. The huge number of empty homes/houses in this country, calculated as standing at well over 900,000 by the charity "Empty Homes" is a national scandal. I ask: what is the empty home situation in this district and what is the Council's policy for encouraging their rehabilitation? How many of these properties are there in this district and where are they located? Where are the necessary registers? Surely, we have councillors with the vigour and imagination to match that of Cornwall's and Kent's...
in dealing sensibly with this growing problem, to the benefit of potential occupants and countryside conservation protection? The area in the Plan envisaged for the main development of some 2000+ houses, East of Ipswich is greenfield land. It is estimated that nationally there are 160,000 acres of brownfield land available for development which should cater for 3 million new homes, and that property developers already have planning permission for around 300,000 houses. Encouraging the latter to start to build would be better than moving onto greenfield sites with all the wider “costs” that would entail.

Summary: The environmental threats to the Deben area posed by the Plan are severe (as its “architects” recognise), with the issue unresolved of the likely full impact on the fragile Deben Estuary and AONB of the proposed Martlesham 2000+ and Felixstowe 1440 houses. The mitigation/s proposed for environmental protection are wholly inadequate, however. What assurances are there that the mitigation measures proposed will work? There are not data given from a robust survey of current numbers and types of visitors to the area, regardless of the impact of future large increases in visitor numbers resulting from such large scale development.

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Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I wish to draw your attention to my objection to the findings in the revised AA and SA of August 2011 as I do not believe all the issues have been addressed and the AA is still too dependant on out of date and inappropriate data. New data acquired from the South Sandlings Survey and the Deben Visitor Survey has been ignored and there is nothing to suggest that the mitigation measures in the form of a country park will actually materialise.

In view of the above the LDF should be debated further by the cabinet.

Summary:
there is nothing to suggest that the mitigation measures in the form of a country park will actually materialise.
As trustees of Waldringfield Church Field Trust we are again writing to object to these proposals. We do not consider the changes to the document make it any way more acceptable than it was previously. The Trust manages one of two public open spaces in the village of Waldringfield.

**OBJECTIONS**

**Summary**

Re: area south and east of Adastral Park: 2000 houses

We consider that the car park at Church Field although meant for users of the field may be used as a starting point for increased use of footpaths along the Deben Estuary leading to significant disturbance of the flocks of birds feeding and roosting there. We continue to have problems with dogs not on leads (in spite of notices) and owners not using the dog waste bins. These problems are likely to be much worse if Waldringfield becomes part of the urban fringe.

**Mitigation proposals**

Whereas both the revised and original documents attempt to maintain that mitigation can solve problems of disturbance to wildlife on the Deben estuary, a number of things are missing:

* No actual study of the area in question, aimed at assessing effects of the proposals - only a desk based exercise referring to inadequate and largely non relevant data.
* No knowledge of current visitor numbers to either the Deben Estuary or the SPA as a starting point for predictions.
* A continued assumption that the development is too far away at 1km from the SPA to have a significant effect, based on a study of a completely different type of area in Dorset. We increasingly notice use of our small car park by people walking down to the river, perhaps to avoid the £1 carparking fee which applies until 6 p.m. in the public car park behind the pub. It is easy to predict parking on road verges all along Mill Road (a single track road) on a nice weekend in Summer if 2000 houses are located a 5 minute drive away.
* References to wardening as solving the problems. The Deben SPA would be impossible to 'police' effectively consisting as it does of tidal mudflats, saltmarsh and winding muddy footpaths. It cannot be fenced either. Dog walkers as we have found take little notice of signs and often refuse to believe their dogs cause a problem of disturbance.
* No reference is made to the potential problems of disturbance and erosion caused by the increased use of powered or other craft on the river which is inevitable.

As before, we consider that the alternative of smaller developments throughout the region in response to local demand and including affordable housing, integrated into existing communities, would be the more logical and desirable.

**Summary:**

References to wardening as solving the problems. The Deben SPA would be impossible to 'police' effectively consisting as it does of tidal mudflats, saltmarsh and winding muddy footpaths. It cannot be fenced either. Dog walkers as we have found take little notice of signs and often refuse to believe their dogs cause a problem of disturbance.

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**Attachments:**

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Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I am writing to object to the Appropriate Assessment report, dated August 2011. In particular I disagree with the conclusions regarding the impact on The Deben Estuary close to Martlesham and Waldringfield. It is clear that the impact will be much greater than the report suggests.

Several of the assumptions used cannot be substantiated. For instance the household size is simply a projection of past trends. There are many reasons why this figure can be challenged: particularly in light of the continuing economic downturn and fuel poverty amongst the elderly and single person households. Even this low figure has been reduced further to 1.57 by considering the district as a whole. When calculating the number of “new people” in the area close to the Deben Estuary at Waldringfield the correct figure should be 2.3 or more. Any calculations based on the low figure are therefore incorrect when applied to specific locations.

The Natural England national visitor survey states that two-thirds of visits were taken within 3.2km of the respondents home. The LDF is proposing that the number of dwellings within this distance from Waldringfield should be increased from around 360 to 2400 or more, with a consequential increase of population of about 600%. The Deben Estuary at Waldringfield and Martlesham are the only areas of public green space within 3.2km of the proposed new settlement and the resulting increase in visitor numbers would have a devastating effect.

Although the report concentrates on the effect of dog walking, there are other problems resulting from increased visitor numbers. As Waldringfield Harbourmaster, I have seen an increasing number of powered vessels launching from Waldringfield. The owners of these vessels are mainly from within 5 miles and I would expect an increase in the local population to result in much more pressure in this respect. The owners often disregard the SCDC speed limit on the river and cause noise and disturbance to birds and other wildlife and erosion to the river banks.

During the summer months I am also aware of an increasing amount of litter from picnics, discarded crabbing lines and bait (mainly bacon and raw meat). This is often left by groups of young people who arrive by cycle. It is likely that they are from the local area (east of Ipswich) and any increase of the local population will certainly exacerbate this problem. Although it is assumed that limited car parking will impose a limit on visitor numbers, the proposed new development is within walking or cycling distance of Waldringfield and the number of visitors from this development would not be so constrained.

It is inconceivable that any of the proposed mitigation measures will have any effect on this problem.

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It is inconceivable that any of the proposed mitigation measures will have any effect on any of these problems.
### Full Text:
The level of housing proposed for Felixstowe is gratuitous and cannot be justified. There is no evidence that this number of houses is needed. Brownfield sites should be considered, and then only when required to fill a proven need.

### Summary:
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### Attachments:

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I object strongly to the level of housing proposed for Felixstowe. There is no proven need for any new homes on this scale.
Although a few changes have been made to the AA and SA documents, there remain several serious flaws.

1. The assessment of increased visitor impact appears still to be based on a survey carried out in 2004.
2. A limited number of Land Managers were consulted and their evidence was generally anecdotal.
3. A survey of an area of heathland in Dorset was used to help predict visitor patterns - this is too different a scenario for any valid conclusions to be drawn.
4. The total increase in population from all the development plans does not seem to have been factored in when considering the increased visitor impact on the European sites. By this I mean the proposed developments at Martlesham, Felixstowe and the Ipswich Borough Council area.
5. A Country Park is proposed to help to alleviate pressure on the European sites, this is supposed to be available for use before the proposed developments get underway. However the only site put forward is Foxhall Tip, which, it is stated further on the same document, will not be available for many years. A clear contradiction.

Summary:
A Country Park is proposed to help to alleviate pressure on the European sites, this is supposed to be available for use before the proposed developments get underway. However the only site put forward is Foxhall Tip, which, it is stated further on the same document, will not be available for many years. A clear contradiction.

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Not Specified  Not Specified  Not Specified  Not Specified  None

Attachments:
full text
Letter from Mrs A Maddison
This document is full of pseudo-scientific statistics that do nothing but conceal facts. For instance, it is clearly absurd to argue that you can place thousands of houses between Martlesham and Waldringfield and this will have no impact on the River Deben because percentage wise this is a small fraction of the population of Ipswich.

This point is finally conceded in Section 5.6.7 (page26) but no attempt is made to recalculate the tiny figures presented in Table 5 (page 17).

Emphasis has been put on the damage to European Wildlife sites, but to reach these sites visitors have to use roads. The impact on local residents of the increased visitor traffic was not addressed in the last survey and has not been addressed in this one.

Creating green spaces for new housing developments will not stop people flooding to the beach and water in the summer months (6.6.3 & 7.2.9 - 7.2.17)

Mitigation (section 7)
This section is full of very strange logic; Section 7.2.8 Paragraph 2 (Page 45) claims two-thirds of people visiting a site will travel up to 3.2km to get there. However, in section 7.2.6 it claims you only have to put houses 1km away from the River Deben to stop significant visits.

Even more surprisingly it claims people will not travel 1km to the River Deben because they will be travelling to the new Country Park, location unknown but possibly to the North or North-East of Ipswich, a distance almost certainly greater than 5km. Is SCDC up to enforcing this and who is to say that this strategy will work?

Comments from Bawdsey Parish Council Continued:

An up-to-date, accurate survey is vital to show current visitor and traffic numbers on our part of the coast in the summer.

Suggested New Mitigation Statements (Section7)
1. No new developments should be within 3km of an SPA. (Explanation: figures of 1km are too low and only cover Rivers Deben and Orwell.)
2. No new development should be visible from anywhere within an envelope up to 100m around an SPA. For example, for up to 100 meters from the bank of the River Deben it should not be possible to see any new developments (including roofs) on either side of the River. (Explanation: this report only considers the impact of people travelling from the new developments to the site. We contend that a site is also damaged if the view from these sites is altered/damaged.)

Summary:
Emphasis has been put on the damage to European Wildlife sites, but to reach these sites visitors have to use roads. The impact on local residents of the increased visitor traffic was not addressed in the last survey and has not been addressed in this one.

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Comments from Bawdsey Parish Council Continued:

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Change to Plan

Appearance at Exam?
Not Specified

Legal?
Not Specified

Sound?
Not Specified

Duty to Cooperate?
Not Specified

Soundness Tests
None

Attachments:
full text
3974 Object
7 - Mitigation 7.2: Mitigation for Policy SP2 (Housing Numbers)

Respondent: Mr David Bucknell [2714]  Agent: N/A

Full Text: I think the mediation is in no way proportionate to the impact. The emphasis on dog walkers is absurd.

Summary: I think the mediation is in no way proportionate to the impact. The emphasis on dog walkers is absurd.

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Full Text: This is 'apple pie' thinking. It is what you would like to happen not to do with what will actually happen.

Summary: This is 'apple pie' thinking. It is what you would like to happen not to do with what will actually happen.

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Dear Sir/Madam

Agent: Mr Stephen Denton [125]

Full Text: Please see below my comments and reasons for my strong objection to the allocation of 2000 homes on the land owned by BT (and others) adjacent to Adastral Park. These are based on my opinion that the Appropriate Assessment is flawed in its methodology and illogical in the conclusions it draws.

The Habitats Directive Article 6(3), contains two important requirements: (a) that any plan or project which is likely to have a significant effect on a Special Area of Conservation must be the subject of an appropriate assessment by a competent national authority; and (b) that the authority may only approve the plan or project when it has ascertained that there will be no adverse effect on the SAC. Specifically it states:-

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

It is my opinion that the August 2011 revision of the Appropriate Assessment fails to demonstrate that the BT site allocation will not have an adverse effect on the SACs in the surrounding area for the following reasons:-

1) The previous version of the AA took into account the data contained in the survey of visitors to the Sandlings area to the NE of Woodbridge. This looked at visitor numbers from a wide area, including for example Ipswich, the IPA portion of SCDC, and the Felixstowe area, and drew conclusions about the degree of impact on that Sandlings area. However the AA went on to draw conclusions about the impact, or otherwise, of the proposed developments (including the BT site) on the SACs in the vicinity of the BT site, despite the fact that there was no data to justify this conclusion, and was based erroneous information about car parking for members of the public at the locations which would give access to the Deben SACs (the AA said there was none, whereas in fact there is at all the relevant locations).

2) The revised August version of the AA has now corrected these errors and makes reference to the small scale study carried out by NANT (which shows that there will be a risk that increased visitor numbers will have an adverse effect on the SAC). However these revisions to the document do not address the continuing fundamental issue that no substantive data is available to assess the degree of risk. Para 9.2 points to the need for further studies.

3) The previous version used the absence of car parking as part of its justification for saying there was little risk. Now that the latest document states (somewhat grudgingly) that there IS in fact car parking it cannot logically follow that the risk is now no greater than was stated in the previous version.

4) The August AA specifically says in para 7.2.6:-

"Further mitigation to reduce harm, as described in paragraphs 7.2.7 - 7.2.15 below remains to be required. A planning application Appropriate Assessment would be needed to look at site- and plan-specific issues. Natural England advised in its email of 15th February 2011 to Suffolk Coastal District that it believes 'that any adverse effects on N2K sites could be mitigated by the use of planning conditions/obligations/legal agreements (S106) to allow us to conclude no adverse effect on integrity. Suitable strategies are detailed in our letter to SCDC of 12 February 2010 which could be employed following AA at project level.'"

The AA also states in para 7.2.8

"The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites"

At the present time there is no information publicly available to demonstrate that there ARE any viable and effective mitigation solutions which are realistically deliverable in the timescale to meet the requirement set out in para 7.2.8. The amount of green space available on the BT site will be very limited for many years due to the mineral extraction programme. The only other nearby site which has been mentioned is the conversion of the Foxhall landfill site into a country park. This site has just completed a programme to line out and prepare capacity for another 300,000 cubic
metres. However the current rate of inert landfill being deposited is some 2000 tons pa, so it clear that unless the rate of landfill is very dramatically changed it will not be available for at least a generation and probably much longer. And even when it is completed and capped off it will require several years to settle and be made safe before public access can be considered. Therefore to even suggest that this site is likely to address the area's need for diversionary green space with the timeframe of the LDF is misleading. The final suggestion that the open space be linked to the PRoW in the area ignores the fact that most of the PRoWs in the area (and certainly those most likely to be attractive to residents on the BT site) go towards the SACs and so will serve only to increase visitors numbers. One final point on this subject is that the proposal is that use of cycles will be encouraged (with dedicated cycle storage etc). This, in turn will encourage residents to cycle down to the Deben (which is about 10 minutes away via an existing bridleway).

Given that the LDF is very site specific with respect to the BT land, and that this is already the subject of two planning applications, it must be presumed that, if the LDF is approved in its present form, the BT development will go ahead. For the Council to suggest otherwise would be startlingly disingenuous. Therefore if the AA is approved (and inter alia the LDF) it is my strong view that any mitigation measures should be firmly identified and evaluated as being effective before the LDF is approved. If the council fails to do this then there is a very real risk that building will go ahead but the mitigation measures will not materialise - either because none can be identified, or cannot be delivered within the timescales set out in para 7.2.8 of the AA.

5) If, despite all the reservations and concerns expressed above, SCDC go ahead and approve the LDF and subsequently take the BT application to planning committee, SCDC should publicly assure its residents that approval WILL NOT be given unless and until substantive and deliverable mitigation measures are identified which are a) evidence based using real visitor data and b) deliverable in the timescales set out in the AA. These are issues which should not be swept under the carpet for later assessment as by then it will be too late to reverse any consents given.

Yours faithfully

Stephen Denton

Summary: At the present time there is no information publicly available to demonstrate that there ARE any viable and effective mitigation solutions which are realistically deliverable in the timescale. The green space on the BT site limited due to the mineral extraction programme. The only other nearby site is the Foxhall landfill site which is expanding. PRoW go towards the SACs and will increase visitors numbers.

Mitigation measures should be firmly identified and evaluated as being effective before the LDF is approved.
I OBJECT to the findings in the revised AA and SA dated August 2011.

Having read the document I see there are a number of factual errors and incorrect assumptions eg.

The riverside footpath along the River Deben opposite Methersgate Quay down river to Early Creek is noted as impassable. In fact the stretches that are impassable are either side of this stretch and the paths in between are well used. The assumption made from this incorrect information is that people do not walk the path. This is utter rubbish and the path north of Waldringfield forms part of a popular circular walk with the lesser used section north of Manor House still used by local walkers. To the south of Waldringfield the path to Early Creek is a walk in itself. People will walk as far as the breach and then turn back. The breach is positioned roughly where there is a breeding colony of terns. The fields to the inland side of this path both north and south are often used for shooting parties and the paths and river also used for wildfowling in season, amongst other activities.

Most of the visitor surveys carried out are not relevant the area around Martlesham Creek and Waldringfield as they relate to the other side of the Deben. By definition the west bank of the Deben lies much closer to the areas denoted for development and will suffer from much more visitor pressure. Although the survey carried out by NANT is not as comprehensive as some others at least some effort has been made to obtain relevant information relating to these areas. SCDC would appear to have made no effort to obtain any more relevant information and have in fact relied on out of date surveys carried out in Dorset where conditions were different. Incorrect conclusions have thus been drawn.

Parking at Waldringfield is seen as self limiting however although there is now some public parking in a pay and display car park at the Maybush this does not stop people parking at the Sailing Club and causing security and access issues there, but also causing congestion along the narrow access road down to the river along the main route through the village or parking at the car parks in Church Field or the village Hall and walking down to the river along the roads or footpaths. Securing the sailing club car park is not an easy matter as many differing groups require access including guests visiting for sailing events hence a secure barrier is not the simple answer.

Mitigation is seen as essential, however Country Parks are being closed by the County Council who cannot afford to run them anymore and the area suggested would not be available at the commencement of the plan nor indeed at the likely end date. What should residents do in the meantime? and what happens when the proposed area fails to materialise? By then it will be too late! 10 years is a long period of pressure to absorb before any mitigation plans would commence. A country park cannot possibly offer the same attractions as the River Deben and the beach at Waldringfield as this is the only beach along the river. This area is also threatened with having the added attraction of a pontoon close to the Pub to provide even more easy access for yachts and power boats.

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Mitigation is seen as essential, however Country Parks are being closed by the County Council who cannot afford to run them anymore and the area suggested would not be available at the commencement of the plan nor indeed at the likely end date. 10 years is a long period of pressure to absorb before any mitigation plans would commence. A country park cannot possibly offer the same attractions as the River Deben and the beach at Waldringfield as this is the only beach along the river.

Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Please explain how you will ensure that the mitigation you recommend is indeed carried out, and what steps will be taken if the developers fail to comply.

Summary:

Please explain how you will ensure that the mitigation you recommend is indeed carried out, and what steps will be taken if the developers fail to comply.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I OBJECT to the revised AA and SA, as above, as you still have not shown any concrete evidence for any mitigation measures to be put in place. A new country park is referred to but no site has been identified for this, no costings for it have been shown, and it is therefore very unlikely ever to be created, given the current budget constraints. The LDF needs to go back to the cabinet for further scrutiny and debate.

ALSO, may I say that I have tried to use your on-line consultation process; I have registered and emailed to have my account activated but nothing has happened. Why do you make it so difficult for members of the public to have their say on this LDF?

I also think the timescales allowed for the consultation were again very short, and the revised document and new review process were very poorly publicised.

I object to the revised AA as you still have not shown any concrete evidence for any mitigation measures to be put in place. A new country park is referred to but no site has been identified for this, no costings for it have been shown, and it is therefore very unlikely ever to be created, given the current budget constraints.
I object to the building of 2000 houses on the BT site at Martlesham Heath because:-

* I object to findings in the revised AA and SA dated August 2011

* It will be very difficult for the infrastructure in thus area which is known to be the _driest_ in England.

* It will destroy the current peace & beauty of our AOB.

* This SSI area will also be affected by too many people spending their leisure time in this already crowded area.

* I also object to the fact that the Suffolk Coastal District Council have not listened or taken into account the protests of the local residents from Waldringfield and other neighbouring villages when dealing with these plans.

* The site is an agricultural area which should be protected as it is needed for growing crops etc.

* The buildings, if put anywhere, should be put on a _brown_ site not green.

* It should not be profit making for BT and others when it is going to destroy so much of the local environment and add more expense for local village councils.

**Summary:**

Objection to IP Policy Area because:

object to findings in SA & AA,

* area is driest in England,

* peace & beauty of AONB will be destroyed,

* The SSSI will be affected by too many people in this already crowded area,

* believe SCDC have not listened or taken into account local views from Waldringfield & other neighbouring villages,

* Its agricultural land which should be retained for farming,

* brownfield land should be used before greenfield,

* BT should not be making a profit when it is going to destroy the local environment and add more expense to local village councils.
With regard to the above consultation, I make the following comments.

Sustainability Appraisal
I am sure this will be a valuable document but I am not expert enough to ascertain how correct it is but suggest that before it is submitted eventually to the Planning Inspectorate an independent unbiased person/company are given the opportunity to ensure it is correct. Only having a November 2010 Core Strategy, it is difficult and time consuming to check whether or not the corrections and deletions have been made.

Appropriate Assessment
I believe that had it not been for Mr Buxton’s letter on behalf of NANT dated 8th July which highlighted inaccurate information and inconsistencies together with NANTS Visitor Survey which was conducted over 16 days in April and May, and the pertinent comments by Simon Cairns of SPS, the Appropriate Assessment would have been submitted to the Inspector as first published.

This new version - August 2011 - has as a result been modified, updated, increased to 54 pages in 2011 from 34 in 2009 but I feel there are still many flaws to many of the sections where detail is glossed over without enough up to date evidence or fact. The changes are minor and considering it is seven years since it was first drawn up and with all the various input of various bodies and Natural England national visitor survey and NANT’s Visitor Survey earlier this year, I am surprised at how little the revised AA document has changed.

The revised version includes additional paragraphs/sections, changes to various tables and references to areas but these bear little relationship to Suffolk Coastal and the pressure on valuable European protected sites that huge increases in tourists and local dog walkers, bird watchers etc. to these sites, are making.

I suggest too, that instead of quoting Dorset as a study area of heathland, you conduct a study here in Suffolk to see what the residual disturbance of birds caused by local people engaged in low key recreational activities on European sites is, it would make it a more credible document. Afterall, visitor numbers to these areas along the River Deben and River Orwell have increased enormously.

Mitigation for Policy SP2 Housing numbers
In 7.2.10, 7.2.11 and 7.2.15 “A new Country Park or similar” is mentioned. It would be helpful if you could indicate where the Country Park is going to be (one presumes on the Foxhall Tip but this is not confirmed) and also where “similar” high quality provision is going to be in the Ipswich Policy Area. This Peninsula and the surrounds of Ipswich do not have hundreds of spares acres waiting to be turned into “green space”. You mention three Country Parks 7.2.13 throughout the County but they all provide Park/green space areas of 13ha. x2 or158ha. This part of Suffolk does not possess that amount of spare land to offer areas for dog walkers away from heathland sites, capable of offering visitor parking, WCs etc. and as a result is a laughable idea and in not way will be possible especially with the present economic climate where funding is in short supply. I cannot see this provision occurring to form a substantial part of your future mitigation programme to preserve the European sites etc., and all that is so valuable to Suffolk Coastal’s unique habitat in providing much needed greenspace for a huge Housing Development at Adastral Park.

I see no reference to mitigation to the AONB areas bordering the Rivers Deben and Orwell. The impact that 1,440 dwellings close by will impact on the vital habitat and estuaries close to Felixstowe and the Trimleys.

I feel this section on Mitigation is very “woolley” in the revised AA.

I personally have noted in the last twenty five years a huge decline in wild birds. For many years flocks of geese grazed on the fields to the right of my cottage and hundreds of lapwings grazed on the fields to my left. Now neither birds graze. Fieldfares and the lark too have disappeared - the volume of traffic, diesel fumes, increase of buildings, dog walkers, combined with “set aside”, which I feel did more damage than good to our natural habitat, has I feel, contributed to the decline and the proposal of 2000 plus dwellings at Adastral Park and 1,440 dwellings down the road at Trimley/Felixstowe four miles away along with all the extra people, cars etc., will totally destroy any bird and wild life, fauna and flora in this area and give a totally urban look to the District. The Mitigation measures suggested will do little to preserve what we at present have, on the AONB, Triple SI and Ramsar sites.

Conclusion
Despite the fact that several “bodies” have brought about a revision of the AA, I am still not convinced that there is any real change backed up by up-to-date current evidence in the August 2011 documents compared with those in September 2009 version.

The integrity of the Deben Estuary will be affected by the proposals for 2000 plus dwellings at Adastral Park and 1440 dwellings further down the road and the proposed mitigation measures mentioned are inadequate and unproven and will result in a serious adverse effect on the Deben Estuary.

Summary:
In 7.2.10, 7.2.11 and 7.2.15 “A new Country Park or similar” is mentioned. It would be helpful if you could indicate where the Country Park is going to be (one presumes on the Foxhall Tip but this is not confirmed) and also where “similar” high quality provision is going to be in the Ipswich Policy Area. This Peninsula and the surrounds of Ipswich do...
not have hundreds of spares acres waiting to be turned into "green space".

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Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I OBJECT to the findings in the AA and SA as follows:

1. Assessment of European site visitor increases

**OBJECTION**

Summary
The data regarding visitor numbers to the Deben SPA is acknowledged to be inadequate - i.e. none exists apart from the Deben Visitor Survey (NANT). Therefore projections regarding the increase in visitor numbers resulting from the proposed housing at Adastral Park are guesswork. As are the resulting projections of potential damage and disturbance to environmentally sensitive sites. It behoves SCDC to conduct proper rigorous studies of visitor numbers to the Deben SPA to create a baseline against which to make realistic assessments.

2. Impact on specific sites

**OBJECTION**

Summary
It is inappropriate to attempt to predict the impact on the Deben SPA of the inhabitants of 2000 houses at Adastral Park from studies relating to completely different habitats (i.e. Dorset heathland) which are not comparable. The Deben is a tidal estuary, beautiful, remote, wild with many special environmental features and other attractions. NANT’s Visitor Survey showed clearly what a draw the river is and that people with dogs walk/drive a great deal more than 1/8kms suggested here. Proper relevant research needs to be done.

3. Assessment of Policy SP2 Housing numbers

**OBJECTION**

Summary
The potential for problems and threats to the integrity of the Deben SPA from siting housing at Adastral Park is acknowledged (6.2.28 and 6.2.30) but SCDC continue to assert wrongly (see above) that people will walk/drive only 1/8kms. The need to provide adequate alternative green space is stated without indicating where/what that might be (see below). Contrary to what is stated at 6.2.35 there is now considerable public car parking available in Waldringfield thus increasing the attractiveness of the location. Contrary to what is stated in 6.2.36 the available riverside route remains attractive for walkers (see below).

4. Mitigation for Policy SP2

**OBJECTION**

Summary
It is disingenuous to continue to insist that the housing policies will have "no adverse effect" on the integrity of the Deben Estuary SPA (7.4.1). The discredited 1km figure is wheeled our again to justify development at Adastral Park (7.2.6). Provision of alternative green space should "precede or coincide with" Phase 1 of housing development (7.2.8). Although the idea of a country park is talked up the reality is that no site is available to precede or coincide with phase 1 and anyway SCC no longer funds country parks so it is a matter of pure speculation.

5. Limitations to the Assessment - Further work needed

**OBJECTION**

Summary
It is scandalous that having admitted that this policy is based on poor and inadequate data SCDC let themselves off the hook by claiming that they don't need to improve the quality of the data before adopting the Core Strategy and therefore opening the door to the building of 2000 houses at Adastral Park. SCDC need to make policy on the basis of sound and robust data not guesswork and speculation when so much is at stake.

**Sustainability Appraisal**

1. Appraisal of Core Strategy Policies - Ipswich Policy Area (SP20)

**OBJECTION**

Summary
It is incorrect to claim that SP20 is "marginally more sustainable" because the policy "seeks to preserve and enhance environmentally sensitive locations" by creating a country park at Foxhall Tip by the end of the plan period. AS stated above alternative green space has to be available at the beginning of the development to act as so-called mitigation in relation to building at Adastral Park.

2. SP20 Ipswich Policy Area

**OBJECTION**

Summary
It is unacceptable to devolve responsibility for safe-guarding Waldringfield and the Deben Estuary to an Area Acton Plan. Issues like congestion, traffic impacts and the increasing number of boats on the river causing problems to feeding birds and erosion of saltmarsh, the preservation of wildlife and habitat all need to be addressed now otherwise the policy is utterly flawed. The LDF needs to be based on robust policies that have addressed these problems and issues at the outset rather than kicking them into the long grass of an AAP.
3. Ipswich Policy Area SP20

OBJECTION

Summary

Again the discredited figure of 1km (see above) is used here to suggest that the integrity of the Deben Estuary can be maintained so long as building is more than 1km away from the river. The NANT survey showed that people walk much more than 1 km and therefore 2000 houses at Adastral Park will generate a huge increase in visitor numbers. SCDC are also wrong to suggest that signs saying "no through route" at Waldringfield deter walkers and thereby claim that birds are protected in those areas.

4. Uncertainties and risks (6.9)

OBJECTION

Summary

If additional greenspace is required as mitigation for the 2000 houses at Adastral Park and there is grave uncertainty that it can be delivered at Foxhall Tip (the only potential site mentioned) then this already flawed plan should not go ahead.

The Appropriate Assessment and the Sustainability Appraisal have not addressed the issues of concern that I have raised before.

Summary:

The discredited 1km figure is wheeled our again to justify development at Adastral Park (7.2.6). Provision of alternative green space should "precede or coincide with~" Phase 1 of housing development (7.2.8). Although the idea of a country park is talked up the reality is that no site is available to precede of coincide with phase 1 and anyway SCC no longer funds country parks so it is a matter of pure speculation.

Change to Plan

Appear at exam? Not Specified

Legal? Not Specified

Sound? Not Specified

Duty to Cooperate? Not Specified

Soundness Tests None

Attachments:
The following points convey my strong objections with particular reference to the proposed housing development at Martlesham Heath. In this letter I am focusing my objections on a critique of the revised documents with respect to protection of the environment and wildlife habitats.

1 Methods of assessing the increase of visitors to European sites
The method of calculating the number of new people per dwelling for the new housing development at Martlesham Heath continues to be opaque to me. Just as the basis of the figure of 0.9 in the September 2009 document was never clarified, neither has the new figure been even though it is slightly more realistic at 1.57 (AA5.3). If the number of new people calculated is unreliable, then the predicted increase in number of visitors to the Deben Estuary (AA 5.3) will be meaningless.

There appears to be an assumption that people moving to the new development will vacate existing housing close by and so will not increase the total number of residents in the area. I have found no evidence to support this assumption.

It makes no sense to base visitor predictions on outdated data from a survey of the AONB published 7 years ago (2004). To be any use, the data should be broken down into visits to specific sensitive European sites within the AONB (ie the Deben Estuary SPA, its European-protected Ramsar wetlands site, Newbourne Springs etc). Predictions made in the Appropriate Assessment (AA) document are especially meaningless given its admission that 'The impacts of these extra visitors are hard to predict.' (AA 5.10) Yet, an increase in visitor numbers to the AONB has been predicted - given as having increased from 2.48% (Sept 2009) to 2.83% (Aug 2011) (AA 5.3). How can a percentage prediction be calculated without knowing the frequency of visits? The obvious solution is to delay any planning decision until an up-to-date independent scientific survey of visitor numbers to and impact on the sensitive European sites within the AONB is conducted.

The revised AA document continues to assume (based on the 2005 Dorset study) that people will not walk more than an average of 1km or drive more than 8km on average for recreation (AA 5.6). Exemplifying from an old study done in a different geographical area is inappropriate to the Deben Estuary, as was pointed out by many respondents in response to the previous consultation, but ignored. Walks and drives for day trips out typically cover much longer distances, especially to the Deben Estuary and Waldringfield with its added attractions of the beach, the river and the Maybush pub.

The AA document contradicts itself later on when referring to the visitor survey conducted by Natural England in 2010-11 (AA 7.2.8). As quoted in the AA document, the NE survey reported that 'two-thirds of visits (66 per cent) were taken within two miles (3.2km) of the respondents' home' (AA 7.2.8). This 3.2km figure is similar to the mean reported by NANT's (2011) Deben Estuary survey of '3.8km for distances travelled on foot' (AA 5.8.6). There is no doubt, therefore, from these figures quoted by the revised AA document itself that many walkers exceed the specified 1km average when visiting this unique area of the Deben Estuary.

Summary of point 1: methods of assessing the increase of visitors to European sites
The method of calculating the number of new people per dwelling for the new housing development at Martlesham Heath continues to be unclear (AA5.3). The predicted increase in number of visitors to the Deben Estuary (AA 5.3) is meaningless when based on unreliable data.

Similarly, basing visitor predictions on outdated, non-representative, non-specific and inaccurate and data are meaningless (AA 5.3, 5.10). The obvious solution is to delay any planning decision until an up-to-date independent scientific survey of visitor numbers to and impact on the sensitive European sites within the AONB is conducted.

2. Mitigation for housing allocations east of Ipswich

The assertion that provision of greenspace local to the new housing will be sufficient for dog-walkers and will have 'no impacts on the respective SPA's (AA 7.2.8) is based on a false assumption. The revised AA document fails to recognize people's recreational wishes and habits. Walks to exercise dogs on a daily basis are indeed likely to be short (perhaps no more than 1km) and take place in the new local green space proposed. But people also look for day trips further afield where there are other attractions (the village pub, river activities, beach at Waldringfield and Deben Estuary SPAs, Ramsar wetlands and SSSIs). The Deben Estuary is no more than 1km from the proposed Martlesham Heath development at its nearest point. It is much closer than the 3.2km average distance covered by walkers reported by Natural England 2010/11 (AA 7.2.8) and the 3.8km average reported by the NANT 2011 survey (AA 5.8.6).

As well as walking, many visitors will and do drive to the SSSIs/SPAs of the Deben Estuary on a regular basis because of its proximity (much less than the 8km criterion from the proposed new housing specified in the documents) and they park in Waldringfield. Car-drivers will not be deterred from driving to Waldringfield and the European-protected sites of the Deben Estuary because a public car-park is now available and located conveniently by the pub and the river. It is untenable, therefore, to accept the revised AA document's conclusion (unchanged from the earlier version) that "...with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." (AA 7.4).

Even if three of the proposed mitigation measures (ensuring at least 1km separates the new development from...
European-protected sites, provision of local greenspace, wardenung and visitor management, SA table 3.2) are provided before the development work begins, the fourth requirement (provision of a new country park) will certainly not be. The revised Sustainability Appraisal (SA) document admits that 'the County Council is currently ceasing to fund such parks' (SA table 3.2) and the likelihood of alternative funds becoming available to restore the Foxhall tip before the Martlesham Heath development goes ahead is nil. Therefore, the threat of damage to the Deben Estuary and its SPA/SSSIs and European-protected Ramsar sites remains and is probably inevitable.

It is mystifying that the conclusions reached by the revised AA document (AA 8) are unchanged since the September 2009 version. Although the revised document concedes that 'It is not possible to ascertain that Policy SP2 has no adverse affect upon the integrity of a number of European sites (without mitigation), because of increased visitor pressure', it assumes that the mitigation strategies proposed will be sufficient to avoid any 'adverse effect upon the integrity of any European site' (AA 8.1.1, 8.1.2). This conclusion is reached even though the document acknowledges that better evidence of the impact of visitor numbers on European sites would have been desirable (AA 9.1). In the next paragraph we read, "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." (AA 9.2). Reaching this conclusion whilst acknowledging the paucity of the evidence and ignoring the most recent evidence available is unacceptable. Why cannot the evidence be first sought through an up-to-date independent study of visitor impact on the relevant European sites? Delaying any planning decision in the Martlesham Heath area until the evidence is available is a small price to pay. Going ahead with the proposal and risking irreversible damage to wildlife habitats protected under European law would be far worse.

Summary of point 2: mitigation for housing allocations east of Ipswich

People walk and drive much further for day trips out than daily dog-exercising walks of 1km. The new local green space proposed will not be sufficient for day trips as the Natural England 2010/11 (AA 7.2.8) and the NANT 2011 surveys (AA 5.8.6) confirm.

Even if three of the proposed mitigation measures are provided before the development work begins, the fourth requirement (provision of a new country park) will certainly not be. The SCC is ceasing to fund such parks and alternative funding is unlikely. Without a new country park the threat of damage to the European-protected sites is inevitable.

Conclusion

Like their predecessors, these revised documents continue to lack clarity and reach conclusions that ignore the evidence. Delaying any planning decision in the Martlesham Heath area until the evidence is available is a small price to pay. Going ahead with the proposal and risking irreversible damage to wildlife habitats protected under European law would be far worse.

The need for more affordable housing in East Suffolk is irrefutable and the decline in provision over past decades is lamentable. A large-scale, single-site new town on rural Greenfield land is not the answer, however. Alternative strategies have not been properly investigated, such as dispersal of housing in small developments throughout the district.

Summary:

People walk and drive much further for day trips out than daily dog-exercising walks of 1km. The new local green space proposed will not be sufficient for day trips as the Natural England 2010/11 (AA 7.2.8) and the NANT 2011 surveys (AA 5.8.6) confirm.

Even if three of the proposed mitigation measures are provided before the development work begins, the fourth requirement (provision of a new country park) will certainly not be. The SCC is ceasing to fund such parks and alternative funding is unlikely. Without a new country park the threat of damage to the European-protected sites is inevitable.

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Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I am writing to record my continued objections to the Martlesham building scheme and in particular to the findings in the revised AA and SA of August 2011. I won’t go into details but, for example, the proposal of a ”new country park” as a mitigating measure seems complete ”eyewash”.

Summary: the proposal of a ”new country park” as a mitigating measure seems complete ”eyewash”
Firstly we wish to complain that the online response system is not sufficiently accessible for members of the general public. Being asked to submit responses within specific sections of two very long documents only works if stakeholders want to make specific comments at these particular points. This system discourages general comments. Splitting the document into sections also means that it is impossible to search comprehensively. In fact, the process is so complicated and time consuming it could discourage stakeholders from making any comments at all.

Also we wish to complain that the website shows 2 conflicting times for the end of the consultation - on one page it states 4.45 pm and on another it states 04.45. This has been brought to the attention of the Chief Executive of SCDC.

Consultation response

NANT OBJECTS to the findings in the revised AA and SA dated August 2011.

The issues identified in our previous consultation responses of January 2011 and subsequent letters to the council have not been addressed by the revisions in the AA and SA.

The latest version of the Appropriate Assessment demonstrates a lack of rigour when presenting "evidence" for assessing environmental risk, some examples:

- If it concedes that no data is available on visitor numbers to the nearby Deben Estuary and yet still goes on to draw unfounded conclusions regarding the impact on the area of 2000 houses at Martlesham. New data such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then to a great extent, ignored in the conclusions.
- If although it now acknowledges that there is public car parking Waldringfield it describes this as limited. No car park in the world has an infinite number of parking spaces so that statement is literally correct. However, the car park rarely reaches capacity and is capable of accommodating a significant increase in numbers of visitors.
- If using this incorrect data it draws the erroneous conclusion that visitors would therefore not be able to arrive by car and would have to arrive on foot.
- If it further concludes that this means that as long as the houses are more than 1km from the river, the new residents will not visit the river, therefore there will be no impact on the Internationally Protected Deben Estuary.
- If it relies on an out of date 2006 study from Dorset to make the 1km assumption even though later studies produced in 2008 and 2009 draw quite different conclusions as does the South Sandlings Survey.
- If it states that there are breaches in the sea wall and therefore people can not go for circular walks and disturb the over wintering birds and other wildlife. Yes there are breaches, but at greater distances from Waldringfield than stated in the AA. In fact these are precisely at the area best known for over-wintering birds. The Deben Estuary Survey shows that many people use Waldringfield as the starting point for riverside walks.
- If some of the proposed mitigation relies on the as yet undefined green space to the north of Ipswich, and/or the conversion of the Foxhall tip to a country park, which elsewhere is highlighted as being undeliverable during the lifetime of the LDF.
- If the AA concludes that because of the limited information on visitor numbers, and therefore the inability to assess the impact of the 2000 houses at Martlesham, a full visitor survey should be commissioned by others in order to determine appropriate mitigation. That makes sense - it then states that this is not necessary for the core strategy. This might apply if the LDF was a true "strategic" document. However, the authors of this Core Strategy have decided to include detailed site-specific housing allocations within the LDF, it is therefore essential, logical and fair that site-specific, deliverable mitigation is correctly determined before progressing any further.

On the basis of the significant anomalies and inaccurate information within the AA and the SA the LDF should be returned to the cabinet for further debate.

Janet Elliot
Mill Cottage
Mill Road
Waldringfield
IP12 4PY

On behalf of the 4000+ supporters of NANT

Summary:

it further concludes that this means that as long as the houses are more than 1km from the river, the new residents will not visit the river, therefore there will be no impact on the Internationally Protected Deben Estuary

Change to Plan

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
### Appropriate Assessment for Core Strategy (August 2011)

#### O - 4325 - 2470 - 7.2: Mitigation for Policy SP2 (Housing Numbers) - None

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| Attachments: | full text |

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Consultation response

NANT OBJECTS to the findings in the revised AA and SA dated August 2011.

The issues identified in our previous consultation responses of January 2011 and subsequent letters to the council have not been addressed by the revisions in the AA and SA.

The latest version of the Appropriate Assessment demonstrates a lack of rigour when presenting "evidence" for assessing environmental risk, some examples

- it concedes that no data is available on visitor numbers to the nearby Deben Estuary and yet still goes on to draw unfounded conclusions regarding the impact on the area of 2000 houses at Martlesham. New data such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then to a great extent, ignored in the conclusions.
- although it now acknowledges that there is public car parking Waldringfield it describes this as limited. No car park in the world has an infinite number of parking spaces so that statement is literally correct. However, the car park rarely reaches capacity and is capable of accommodating a significant increase in numbers of visitors.
- using this incorrect data it draws the erroneous conclusion that visitors would therefore not be able to arrive by car and would have to arrive on foot
- it further concludes that this means that as long as the houses are more than 1km from the river, the new residents will not visit the river, therefore there will be no impact on the Internationally Protected Deben Estuary
- it relies on an out of date 2006 study from Dorset to make the 1 km assumption even though later studies produced in 2008 and 2009 draw quite different conclusions as does the South Sandlings Survey
- it states that there are breaches in the sea wall and therefore people can not go for circular walks and disturb the over wintering birds and other wildlife. Yes there are breaches, but at greater distances from Waldringfield than stated in the AA. In fact these are precisely at the area best known for over-wintering birds. The Deben Estuary Survey shows that many people use Waldringfield as the starting point for riverside walks.
- some of the proposed mitigation relies on the as yet undefined green space to the north of Ipswich, and/or the conversion of the Foxhall tip to a country park, which elsewhere is highlighted as being undeliverable during the lifetime of the LDF.
- the AA concludes that because of the limited information on visitor numbers, and therefore the inability to assess the impact of the 2000 houses at Martlesham, a full visitor survey should be commissioned by others in order to determine appropriate mitigation. That makes sense - it then states that this is not necessary for the core strategy. This might apply if the LDF was a true "strategic" document. However, the authors of this Core Strategy have decided to include detailed site-specific housing allocations within the LDF, it is therefore essential, logical and fair that site-specific, deliverable mitigation is correctly determined before progressing any further.

On the basis of the significant anomalies and inaccurate information within the AA and the SA the LDF should be returned to the cabinet for further debate.

Janet Elliot
Mill Cottage
Mill Road
Waldringfield
IP12 4PY

On behalf of the 4000+ supporters of NANT

Summary:

some of the proposed mitigation relies on the as yet undefined green space to the north of Ipswich, and/or the conversion of the Foxhall tip to a country park, which elsewhere is highlighted as being undeliverable during the lifetime of the LDF.
### Appropriate Assessment for Core Strategy (August 2011)

**Object**

| 4328 | 7 - Mitigation | 7.2: Mitigation for Policy SP2 (Housing Numbers) |

#### Change to Plan

- **Appear at exam?** Not Specified
- **Legal?** Not Specified
- **Sound?** Not Specified
- **Duty to Cooperate?** Not Specified
- **Soundness Tests** None

#### Attachments:

- **full text**

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Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Full Text:

* Please reword the verbs. Where you have used ‘should’ or ‘would’ is guidance to the developers, please replace with ‘must’. Or, if you are unable to do this, please explain the circumstances under which you would allow a development to proceed without doing what you suggest.

* Please define “…sufficient greenspace…”.

* Please define “…adequate public open space…”.

* Where Parag 7.2.8 states: “…Two-thirds of visits (66 per cent) were taken within two miles (3.2km) of the respondents’ home highlighting the importance of accessible green space that is close to home. Greenspace provision close or within residential development, with characteristics of urban parks and of countryside, is therefore likely to be very well used.” The reader is aware of the conflict with the earlier statement in Parag 7.2.6 “…Provided that strategic housing proposals for development to the east of Ipswich at Martlesham are greater than 1km from the Deben estuary (thus reducing the likelihood of many walkers),…”

o Please explain how you will resolve the conflict between these two paragraphs.

o Would there be a role for a public car park outside the village of Waldringfield which anticipates the impacts of parag 7.2.8, but encourages people to leave their cars outside the village - the roads in the village are so narrow and windy that we fear significant traffic problems from this development.

Summary:

Please reword the verbs. Where you have used ‘should’ or ‘would’ is guidance to the developers, please replace with ‘must’.

Please define “…sufficient greenspace…”.

Please define “…adequate public open space…”.

Please explain how you will resolve the conflict between paragraghs 7.2.8 and 7.2.6.

o Would there be a role for a public car park outside the village of Waldringfield which anticipates the impacts of parag 7.2.8, but encourages people to leave their cars outside the village - the roads in the village are so narrow and windy that we fear significant traffic problems from this development.

Change to Plan

Not Specified

Not Specified

Not Specified

Not Specified

None

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Appropriate Assessment for Core Strategy (August 2011)

3860 Object

7 - Mitigation Mitigation for Strategic Allocations east of Ipswich and at Felixstowe

Respondent: Mr Jonathan Hopper [2575] Agent: N/A

Full Text:

* Please reword the verbs.
  o Where you have used 'should' or 'would' is guidance to the developers, please replace with 'must'. Or, if you are unable to do this, please explain the circumstances under which you would allow a development to proceed without doing what you suggest.
  * Please define "...sufficient greenspace...".
  * Please define "...adequate public open space...".

Parag 7.2.8 states: "...Two-thirds of visits (66 per cent) were taken within two miles (3.2km) of the respondents' home WHILE Parag 7.2.6 "...Provided that strategic housing proposals for development to the east of Ipswich at Martlesham are greater than 1km from the Deben estuary (thus reducing the likelihood of many walkers), ..."

o Please explain how you will resolve the conflict between these two paragraphs.

o Would there be a role for a public car park outside the village of Waldringfield which anticipates the impacts of parag 7.2.8, but encourages people to leave their cars outside the village - the roads in the village are so narrow and windy that we fear significant traffic problems from this development.

Summary:

Please reword the verbs.

o Where you have used 'should' or 'would' is guidance to the developers, please replace with 'must'. Or, if you are unable to do this, please explain the circumstances under which you would allow a development to proceed without doing what you suggest.
  * Please define "...sufficient greenspace...".
  * Please define "...adequate public open space...".

Conflict between Parag 7.2.8 and Parag 7.2.6 "...

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Appropriate Assessment for Core Strategy (August 2011)

3866 Object

7 - Mitigation

Mitigation for Strategic Allocations east of Ipswich and at Felixstowe

Respondent: Mr Miles Hopper [2576]  
Agent: N/A

Full Text:

* Please reword the verbs.
  o Where you have used ‘should’ or ‘would’ is guidance to the developers, please replace with ‘must’. Or, if you are unable to do this, please explain the circumstances under which you would allow a development to proceed without doing what you suggest.
  * Please define “...sufficient greenspace...”.
  * Please define “...adequate public open space...”.

7.2.8 conflicts with 7.2.6
  o Please explain how you will resolve the conflict between these two paragraphs.
  o Would there be a role for a public car park outside the village of Waldringfield which anticipates the impacts of parag 7.2.8, but encourages people to leave their cars outside the village - the roads in the village are so narrow and windy that we fear significant traffic problems from this development.

Summary:

* Please reword the verbs.
  o Where you have used ‘should’ or ‘would’ is guidance to the developers, please replace with ‘must’. Or, if you are unable to do this, please explain the circumstances under which you would allow a development to proceed without doing what you suggest.
  * Please define “...sufficient greenspace...”.
  * Please define “...adequate public open space...”.

7.2.8 conflicts with 7.2.6

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Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Object

Mitigation for Strategic Allocations east of Ipswich and at Felixstowe

Respondent: Miss Hannah Hopper [2577]  Agent: N/A

Full Text:

* Please reword the verbs.
  o Where you have used 'should' or 'would' is guidance to the developers, please replace with 'must'. Or, if you are unable to do this, please explain the circumstances under which you would allow a development to proceed without doing what you suggest.
  * Please define "...sufficient greenspace...".
  * Please define "...adequate public open space...".

Parag 7.2.8 ("...Two-thirds of visits (66 per cent) were taken within two miles (3.2km) of the respondents' home" ...):conflicts with 7.2.6."...Provided that strategic housing proposals for development to the east of Ipswich at Martlesham are greater than 1km from the Deben estuary (thus reducing the likelihood of many walkers)"
  o Please explain how you will resolve the conflict between these two paragraphs.
  o Would there be a role for a public car park outside the village of Waldringfield which anticipates the impacts of parag 7.2.8, but encourages people to leave their cars outside the village - the roads in the village are so narrow and windy that we fear significant traffic problems from this development.

Summary:

* Please reword the verbs.
  o Where you have used 'should' or 'would' is guidance to the developers, please replace with 'must'. Or, if you are unable to do this, please explain the circumstances under which you would allow a development to proceed without doing what you suggest.
  * Please define "...sufficient greenspace...".
  * Please define "...adequate public open space...".

Parag 7.2.8 conflicts with 7.2.6

Change to Plan

Not Specified  Not Specified  Not Specified  Not Specified  None

Attachments:
I OBJECT to the findings in the revised AA and SA dated August 2011. The issues identified in my previous consultation responses have not been addressed by the revisions in the AA and SA.

In addition, the AA still gives inappropriate weight to out of date and inappropriate data. New data, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions.

An essential piece of the so called “suite of mitigation measures” is a new country park. No site has been identified or costed - there is no evidence that this will materialise.

On the basis of these revisions the LDF should be returned to the cabinet for further debate. Please note I have copied this text from the NANT web site, as it is a concise reflection of my concerns.

As SCDC is ignoring the need for practical, attractive and local recreational space to mitigate the effect of the proposed BT development on the Deben Estuary and Sandling areas.
The issues I raised concerns about in my previous consultation responses are not properly examined or taken into account by the revisions in the AA and SA.

The AA still draws upon out of date and irrelevant data. New data, like the South Sandlings Survey and the Deben Visitor Survey whilst acknowledged have not been properly examined, therefore their findings ignored in the conclusions.

Mitigation measures rely on the establishment of a new country park. A site has neither been identified nor examined from an economic point of view. There is no evidence such a site will become available.
3932  
Object  Mitigation for Strategic Allocations east of Ipswich and at Felixstowe

Respondent: Mrs Helga Ballam [269]  
Agent: N/A

Full Text: The AA still draws upon out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey whilst being acknowledged have not been properly examined and therefore their findings have been ignored in the conclusions.

Summary: The AA still draws upon out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey whilst being acknowledged have not been properly examined and therefore their findings have been ignored in the conclusions.

Change to Plan

Appear at exam? Not Specified
Legal? Not Specified
Sound? Not Specified
Duty to Cooperate? Not Specified
Soundness Tests None

Attachments:
Martlesham Parish Council

Response to the SCDC Consultation on Updated Sustainability Appraisal and Appropriate Assessment Documents (August 2011)

MPC Response

Martlesham Parish Council is not persuaded that the redrafting of elements of the appropriate assessment and sustainability appraisals has made the Core Strategy any more acceptable or any less flawed in its argumentation. Whilst we are reassured that there is now a clear intent to meet needs in terms of 'well managed access to green space within settlements...without detriment to wildlife and landscape character' there is absolutely no viable demonstration or route map as to how this will actually be achieved save deferral of the issues to the Martlesham Area Action Plan. In our view this is a total abrogation of responsibility that the design of the Core Strategy drew to itself when choosing to incorporate a site specific housing allocation. In essence the Core Strategy fails to meet the test of soundness whilst it incorporates the specific Martlesham housing allocation and does not detail a tangible means of mitigation of acknowledged issues identified by the sustainability appraisal.

Consultation response items

Note: there is no order of importance in the item numbering

1. Provision of open spaces. Neither the Appropriate Assessment (AA) nor the Core Strategy contain any tangible identified land for delivering open space from the outset of the build. AA Reference or Policy: SP20

2. Site Specific Allocation & Mitigation. If the site specific housing allocation is part of the Core Strategy, then the site specific mitigations must also be part of that Core Strategy. There is at last an acknowledgement that mitigation is required but it has been dropped to the Area Action Plan to resolve.

3. Foxhall Country Park ‘...it will be important that in the MAAP open space is provided,...and is available when people first start moving to the site...’ The Waste Core Strategy envisaged landfill ending in 2019 and the site being restored by 2021. Now the Market has changed and Viridor will review the situation possibly extending the mothballing. It is highly unlikely the Country Park will be established by the time the BT Martlesham development is completed. AA Reference or Policy: Page 9

4. Green Space Commitment "The developments should deliver sufficient greenspace to accommodate the increased requirement for local recreation opportunities, so that there are no impacts upon the respective SPAs. The provision of adequate public open space within strategic developments, to provide alternative recreational opportunities for routine use, will include areas which are suitable and attractive for walking dogs off leads. The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites”

Any agreement that Natural England may be deemed to have given is based on the above assumption and yet the document singularly fails to address how this will be achieved. To commit to housing land without a firm commitment to green space does not recognise the scale of the risk if such land is not made available. AA Reference or Policy: para 7.2.8

5. Deben SPA. Effect of development on Deben SPA. Improvements to the evidence base are asked for, but the lack of evidence will not delay the AA & Core Strategy.

It is essential that the Area Action Plan takes a cautious approach to locating development close to the Deben SPA whilst this evidence is gathered. A 1km "gap" is considered far too short with the excellent and well used footpaths already in existence, and the high proportion of leisure cyclists in the Martlesham area.

Summary:

Any agreement that Natural England may be deemed to have given is based on the assumption that "developments should deliver sufficient greenspace to accommodate the increase requirement for local recreation opportunities, so that there are no impacts upon the respective SPAs" and yet the document singularly fails to address how this will be achieved. To commit to housing land without a firm commitment to green space does not recognise the scale of the risk if such land is not made available.
Appropriate Assessment for Core Strategy (August 2011)

Object

Mitigation for Strategic Allocations east of Ipswich and at Felixstowe

Respondent: No Adastral New Town (NANT) (S Denton) [449]

Agent: N/A

Full Text:

Please see below my comments and reasons for my strong objection to the allocation of 2000 homes on the land
owned by BT (and others) adjacent to Adastral Park. These are based on my opinion that the Appropriate Assessment
is flawed in its methodology and illogical in the conclusions it draws.

The Habitats Directive Article 6(3), contains two important requirements: (a) that any plan or project which is likely to
have a significant effect on a Special Area of Conservation must be the subject of an appropriate assessment by a
competent national authority; and (b) that the authority may only approve the plan or project when it has ascertained
that there will be no adverse effect on the SAC. Specifically it states:-

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a
significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate
assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of
the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national
authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of
the site concerned and, if appropriate, after having obtained the opinion of the general public."

It is my opinion that the August 2011 revision of the Appropriate Assessment fails to demonstrate that the BT site
allocation will not have an adverse effect on the SACs in the surrounding area for the following reasons:-

1) The previous version of the AA took into account the data contained in the survey of visitors to the Sandlings area to
the NE of Woodbridge. This looked at visitor numbers from a wide area, including for example Ipswich, the IPA portion
of SCDC, and the Felixstowe area, and drew conclusions about the degree of impact on that Sandlings area. However
the AA went on to draw conclusions about the impact, or otherwise, of the proposed developments (including the BT
site) on the SACs in the vicinity of the BT site, despite the fact that there was no data to justify this conclusion, and was
based erroneous information about car parking for members of the public at the locations which would give access to
the Deben SACs (the AA said there was none, whereas in fact there is at all the relevant locations).

2) The revised August version of the AA has now corrected these errors and makes reference to the small scale study
carried out by NANT (which shows that there will be a risk that increased visitor numbers will have an adverse effect on
the SAC). However these revisions to the document do not address the continuing fundamental issue that no
substantive data is available to assess the degree of risk. Para 9.2 points to the need for further studies.

3) The previous version used the absence of car parking as part of its justification for saying there was little risk. Now
that the latest document states (somewhat grudgingly) that there is in fact car parking it cannot logically follow that the
risk is now no greater than was stated in the previous version.

4) The August AA specifically says in para 7.2.6:-

"Further mitigation to reduce harm, as described in paragraphs 7.2.7 - 7.2.15 below remains to be required. A planning
application Appropriate Assessment would be needed to look at site- and plan-specific issues. Natural England advised
in its email of 15th February 2011 to Suffolk Coastal District that it believes 'that any adverse effects on N2K sites could
be mitigated by the use of planning conditions/obligations/legal agreements (S106) to allow us to conclude no adverse
effect on integrity. Suitable strategies are detailed in our letter to SCDC of 12 February 2010 which could be employed
following AA at project level."

The AA also states in para 7.2.8

"The development of the public open space would be timed to either precede or coincide with the first phase of housing
development, as people would be expected to establish walking habits (including dog walking) as soon as they moved
to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a
network of paths and circular walks to attract people away from designated sites"

At the present time there is no information publicly available to demonstrate that there ARE any viable and effective
mitigation solutions which are realistically deliverable in the timescale to meet the requirement set out in para 7.2.8.

The amount of green space available on the BT site will be very limited for many years due to the mineral extraction
programme. The only other nearby site which has been mentioned is the conversion of the Foxhall landfill site into a
site) on the SACs in the vicinity of the BT site, despite the fact that there was no data to justify this conclusion, and was
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to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a
network of paths and circular walks to attract people away from designated sites"

At the present time there is no information publicly available to demonstrate that there ARE any viable and effective
mitigation solutions which are realistically deliverable in the timescale to meet the requirement set out in para 7.2.8.

The amount of green space available on the BT site will be very limited for many years due to the mineral extraction
programme. The only other nearby site which has been mentioned is the conversion of the Foxhall landfill site into a
country park. This site has just completed a programme to line out and prepare capacity for another 300,000 cubic
metres. However the current rate of inert landfill being deposited is some 2000 tons pa, so it clear that unless the rate
of landfill is very dramatically changed it will not be available for at least a generation and probably much longer. And
even when it is completed and capped off it will require several years to settle and be made safe before public access
can be considered. Therefore to even suggest that this site is likely to address the area's need for diversionary green
space with the timeframe of the LDF is misleading. The final suggestion that the open space be linked to the PRoW in
the area ignores the fact that most of the PRoWs in the area (and certainly those most likely to be attractive to residents
on the BT site) go towards the SACs and so will serve only to increase visitors numbers. One final point on this subject
is that the proposal is that use of cycles will be encouraged (with dedicated cycle storage etc). This, in turn will
encourage residents to cycle down to the Deben (which is about 10 minutes away via an existing bridleway).

Given that the LDF is very site specific with respect to the BT land, and that this is already the subject of two planning
applications, it must be presumed that, if the LDF is approved in its present form, the BT development will go ahead.

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For the Council to suggest otherwise would be startlingly disingenuous. Therefore if the AA is approved (and inter alia the LDF) it is my strong view that any mitigation measures should be firmly identified and evaluated as being effective before the LDF is approved. If the council fails to do this then there is a very real risk that building will go ahead but the mitigation measures will not materialise - either because none can be identified, or cannot be delivered within the timescales set out in para 7.2.8 of the AA.

5) If, despite all the reservations and concerns expressed above, SCDC go ahead and approve the LDF and subsequently take the BT application to planning committee, SCDC should publicly assure its residents that approval WILL NOT be given unless and until substantive and deliverable mitigation measures are identified which are a) evidence based using real visitor data and b) deliverable in the timescales set out in the AA. These are issues which should not be swept under the carpet for later assessment as by then it will be too late to reverse any consents given.

Summary: Believe that if the LDF is approved in its present form, then the BT development will go ahead. For the Council to suggest otherwise would be startlingly disingenuous. Therefore if the AA is approved (and inter alia the LDF) it is my strong view that any mitigation measures should be firmly identified and evaluated as being effective before the LDF is approved. If the council fails to do this then there is a very real risk that building will go ahead but the mitigation measures will not materialise - either because none can be identified, or cannot be delivered within the timescales set out in para 7.2.8 of the AA.
This letter is the formal submission from Save Felixstowe Countryside to the above consultations, as they affect the Felixstowe peninsula, and wishes to register its objection to all aspects of the consultations. We would ask you to note our comment that your on-line submission system is time-consuming, impossible to search sufficiently to target relevant comments and designed to deter stakeholders from responding.

With regard to sustainability, Save Felixstowe Countryside is concerned at the lack of evidence to support this in the following areas:

Traffic / Mitigation

The A14 to the Orwell Bridge is running at 90% capacity now, and the Port is said to be adding another 100,000+ lorries over the next ten years. 1760 new homes on the Felixstowe peninsula will potentially add another 3000 vehicles to the local road network which is already close to gridlock.

We believe that the LDF traffic mitigation aspirations are completely unrealistic and will have, at best, only marginal impacts on the extra congestion.

Mitigation measures are virtually impossible to put in place as it is unrealistic to limit new residents to the use of public or sustainable transport. Even people who live close to their place of work may choose to go by car as this offers a higher degree of flexibility and comfort than public transport or cycling/walking.

Infrastructure / Mitigation

There is no evidence to support the LDF's aspiration that developers will provide all/any of the infrastructure necessary to sustain housing numbers on this scale, and would inevitably look to the District to provide whatever was necessary - or the community would go without, which is the more likely option.

Employment / Mitigation

Currently there is almost total reliance on the Port of Felixstowe, with local tourism and service industries being in serious decline. The London Gateway Port at Southend, whose deep-water berth facilities will be available in less than two years, will pose a serious threat to the Port of Felixstowe which itself will be looking to save money and make savings through automation and reducing staff numbers. Their quote of providing 1600 more jobs is seen as propaganda to support their 125th anniversary celebrations, and is unsubstantiated by any evidence.

For the foreseeable future the economic climate does not offer any mitigation against reliance on one employer. Small specialist companies distributed across the District are likely to be the main sources of employment, therefore a sustainable planning policy would place increased housing within reach of those areas in order to reduce the reliance on commuting.

Affordable Housing / Mitigation

Suffolk Coastal has a 1 in 3 policy of Affordable Homes provision. However, in a number of current small developments this policy has been “factored out” as developers strive to build high-end homes in affluent areas. To compensate for this, they will look to concentrate lower-end homes all together, creating a “ghetto” effect which will detract from the quality of life enjoyed by people in the locality at present.

It is acknowledged within the Core Strategy that the future role of foreign economic migrants is not considered within the Plan. Therefore, to restrict Affordable Housing will be to exclude the inevitable influx of members of this group, while a large supply of executive higher-end homes will ensure the continuing influx of people of/nearing retirement age which the LDF does not consider a “sustainable” group.

Environment / Mitigation

Inevitable increases in traffic on the A14 and local road network will increase air pollution on a peninsula already suffering light and noise pollution from a busy Port. This will have an unavoidable adverse effect on ALL residents which in our view does not support the planning policy as being sustainable.

Landscape / Mitigation

The visual landscape will be destroyed in many parts of the Felixstowe peninsula, and while no-one is entitled to a "view", taking away a visual amenity is known to have an adverse effect on morale and social behaviour within the local
Mitigation for Strategic Allocations east of Ipswich and at Felixstowe

community.

We also do not agree that sustainable development will respect the character of settlements and landscape, as the character of our rural landscape will be completely destroyed by any housing development.

Flooding / Mitigation

The David Lock report identified brownfield land within the peninsula which could accommodate hundreds of homes without any need to touch greenfield land. These sites were subsequently excluded on grounds that they were subject to flooding.

However, the Environment Agency allows development in flood risk areas where the benefits of development outweigh the risks, as long as these developments include mitigation measures to minimise the risk.

Â£10 million is currently being spent on new sea defences which are said to be necessary to protect "1000 homes and businesses for the next 100 years".

These defences would therefore provide the mitigation that would allow brownfield sites previously excluded to be brought back into the equation and preserve greenfield land for agricultural use, which was stated by Suffolk Coastal as one of its priorities following the Orwell Hotel meeting in August 2008.

Appropriate Assessment

The Rt Hon David Cameron, when he wrote to the National Trust, assured us that "sustainable development means maintaining a balance between economic, environmental and social concerns". However, we have seen no evidence of this being taken into account by Suffolk Coastal District Council when putting together its Core Strategy, which we continue to reject as being not economically viable, not environmentally friendly and undertaken without the support of the community.

Your own statements confirming that the above factors were considered during plan preparation would indicate that a thorough and independent examination of the plan and its implications had been undertaken. It is therefore a surprise to find that the main contributors are either employed by, or attached to, Suffolk County Council. As the County Council would itself benefit from new development on this scale, it is questionable whether the appraisal has been independently audited for sustainability and soundness.

General

In summary, Save Felixstowe Countryside rejects the Sustainability Appraisal and Appropriate Assessment consultations in their entirety. We also re-state our objection to the scale of new homes proposed for the Felixstowe peninsula and the proposal to build on greenfield land.

The District Council has now been relieved of its obligation to provide a statutory number of homes, and has been told by its own government to make its decisions in the best interests of the local area. It is our view that what is proposed for Felixstowe is not in the Town's best interests.

Summary:

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We believe that the LDF traffic mitigation aspirations are completely unrealistic and will have, at best, only marginal impacts on the extra congestion. Mitigation measures are virtually impossible to put in place as it is unrealistic to limit new residents to the use of public or sustainable transport.

Change to Plan

Appear at exam? Not Specified
Legal? Not Specified
Sound? Not Specified
Duty to Cooperate? Not Specified
Soundness Tests None

Attachments: full text

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Appropriate Assessment for Core Strategy (August 2011)

4039 Object

7 - Mitigation Mitigation for Strategic Allocations east of Ipswich and at Felixstowe

Respondent: Mrs Gillian Mason [1677] Agent: N/A

Full Text:

LDF CORE STRATEGY - SUSTAINABILITY APPRAISAL CONSULTATION
LDF CORE STRATEGY - APPROPRIATE ASSESSMENT CONSULTATION

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Summary:

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Attachments: full text
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<th>Respondent:</th>
<th>Mrs Jennifer Egan [329]</th>
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**Full Text:**
Dear Sir

I OBJECT to the findings in the revised AA and SA dated August 2011

The issues identified in my previous consultation responses have not be addressed by the revisions in the AA and SA

In addition, the AA is still giving inappropriate weight to out of date and irrelevant data

The South Sandlings Survey and the Deben Visitor Survey have both been acknowledged but then ignored

A new Country Park is going to go where? and at a cost of what? no site has been identified or costed and there is no evidence that it will ever materialise

The LDF should be returned to cabinet for further debate

Yours faithfully
Mrs J Egan

**Summary:**
A new Country Park is going to go where? and at a cost of what? no site has been identified or costed and there is no evidence that it will ever materialise

**Change to Plan**

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**Attachments:**

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I write to object to the findings of the revised AA and SA dated August 2011, and as a local taxpayer demand that the LDF is returned to cabinet for further debate.

The revised AA and SA documents still seem to be relying on out of date and misleading data. It could also be said that the authors have used statistics to get to the answer the council has always wanted.

With the strap line 'where quality of life counts' the LDF (which still reflects BT’s application or put it another way is the BT application) would be laughable if it was not so sad. I cringe to think that the council feels that it's citizens quality of life will be maintained with a country park, presumably on the west side of the A12 at Foxhall waste site. The council is aware that there are no funds to maintain and manage such a site even if they get developer funding to start it. It is blindingly obvious that the occupants of the new housing on the east side of the A12 would have to cross said road to get to it!

Specifically the BT application, should it be given permission, will be sold to a developer who will buy on the basis of 'planning gain.' They will return to SCDC and claim that they have overpaid for site and did not recognise the level of developer funding required for mitigation projects. The development is 'cancelled' until the council allows more homes than on the original application so that a profit can be made. With council relying on this project to deliver the homes it thinks it needs it will be forced to allow more units on the site to get 'the job done.' More people means more pressure on local resources and further deterioration in the quality of life in the district.

Your faithfully
Ian Johnson
Full Text:

Please see below my comments and reasons for my strong objection to the allocation of 2000 homes on the land adjacent to Adastral Park. In my view, no effective case has been made for building a new town in this location. I have expressed my views about this in detailed responses to previous consultations and my objections previously expressed still stand. My comments in response to this latest round of consultation are summarised below.

CONSULTATION PROCESS

Firstly, having looked at your current online consultation response system, it seems to me designed to assist analysis (which is useful), but very complex and time-consuming for members of the public wishing to make their views known. I had not realised, until today, that the only alternative method you offer is representation by post. Since I am now unable to active that by your deadline, I am requesting that you treat this email as equivalent to a letter sent by post. My full contact details are supplied below.

I'm not sure why you decided not to offer an option for reply by email. A cynic might think you were trying to put barriers in the way of people sending responses - your process seems designed to put people off! You will need to beware of drawing false conclusions that there are fewer objections now than before. If you make the response system complicated, people will be put off, but it doesn't mean they are no longer objecting to the allocation of 2000 houses on that site.

APPROPRIATE ASSESSMENT

It is apparent that the original Appropriate Assessment contained errors and omissions and that further research is still required to understand the full picture. However, producing a revised document and then carrying on as before is not good enough, because all the conclusions that flowed from the inaccurate assessment have been undermined. Arguments that were made on this topic by many members of the public in response to earlier rounds of consultation are valid but are being ignored. It is apparent that the Council is keen to proceed with its original plan - great emphasis is placed on the length of time you have been working on it, as though this justifies the outcome. When evidence that forms the foundation for an argument is undermined, it is necessary to go back to first base and examine all the options which were originally available, based on the new improved evidence.

In my view, proceeding with the housing allocation near Adastral Park will have a very negative impact on the Deben Estuary protected areas and there is no clear and effective plan to mitigate it effectively. It is no good leaving these things to chance in the hope that someone will magic something out of the bag at some future date. If you are planning to create a new town in a currently rural location, you must make specific provision for the necessary mitigation on the surrounding environment, although in my view, no matter what is provided, people will still be drawn to the River Deben estuary. Provision of mitigating green spaces requires specific locations (after all the strategy includes a specific allocation for the biggest allocation of housing), specific funding and proper evaluation to show that the mitigation will be effective. I still do not see where and when a new country park is to be created and am aware that the Foxall landfill site would not be available for that purpose within the lifetime of the current LDF.

I believe that the evidence on which the original decision to allocate 2000 houses on this site was flawed and nothing has changed that situation to date. On that basis, I object.

Summary:

In my view, proceeding with the housing allocation near Adastral Park will have a very negative impact on the Deben Estuary protected areas and there is no clear and effective plan to mitigate it effectively. It is no good leaving these things to chance in the hope that someone will magic something out of the bag at some future date. If you are planning to create a new town in a currently rural location, you must make specific provision for the necessary mitigation on the surrounding environment, although in my view, no matter what is provided, people will still be drawn to the River Deben estuary.
I OBJECT to the findings in the revised AA and SA dated August 2011.

The issues identified in my previous consultation responses have not been addressed by the revisions in the AA and SA.

In addition, the AA still gives inappropriate weight to out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions. As have various points raised in my earlier two emails, one of which is attached. The comments in those emails are still valid.

I am firmly of the opinion that whatever any of those who live in in the area say are ignored (or mentioned and then ignored).

The govt's view on planning has changed to brown field sites only, and development should be spread throughout the area not just dumped in one place (Martlesham Heath).

On the basis of these revisions the LDF should be returned to the cabinet for further debate.

Summary:

The govt's view on planning has changed to brown field sites only, and development should be spread throughout the area not just dumped in one place (Martlesham Heath).

Change to Plan

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Attachments:
I OBJECT to the conclusions of both the Appropriate Assessment and Sustainability Appraisal. The Appropriate Assessment draws wide-ranging conclusions which are based on out-of-date and largely irrelevant data, absurd assumptions and flawed logic. No attempt has been made to find out basic information such as the current number of visitors to the Deben and Orwell Estuaries. Far too much reliance is placed on mitigation to magically turn an ‘adverse effect upon the integrity of a number of European sites’ into an ‘insignificant level’ with ‘no adverse effect upon the integrity of any European site.’ (§8.6.1).

The Sustainability Appraisal also places far too much reliance on mitigation, ignoring the fact that a mitigation site hasn't been found, is unfunded and is unlikely to deter visitor for going to the Deben and Orwell Estuaries even if it does materialise on time.

All the points I have made in previous consultation responses still stand.

Detailed Comments

Sustainability Appraisal
Many of SCDC's responses to the consultation comments are inadequate I will however only comment on the response to my own consultation comments (RepId: 3354):

My Comments
The Sustainability Appraisal should have been rewritten in the light of the potentially significant changes to the LDF Core Strategy. Admittedly, very little has actually changed, but that is not the point - the removal of the RSS has opened up many new possibilities which should have been evaluated for sustainability. For example, the constraints on the housing numbers and their distribution between the IPA [now the EIPA] and the rest of the district have been completely removed. No assessment of the sustainability of a more even housing distribution or a variety of different overall housing numbers has been done

SCDC's Response
Noted. New options for housing pending the abolition of the RSS have not been presented for appraisal. The Council has looked at the new evidence gathered and decided on an appropriate housing number and distribution.

No change to the SA required.

My Response to SCDC's Response
SCDC's response completely misses the point: the sustainability of all the options should have been assessed, and the decisions about housing numbers and distribution based on those assessments. Instead, these decisions were made without any regard to the sustainability of the various options.

Policy SP20 is not more sustainable
The policy SP20 Ipswich Policy Area is described as marginally more sustainable, on the basis of the creation of a country park at the Foxhall Tip. But this is unlikely to be developed within the plan period, so the policy could not have become more sustainable.

The Area Action Plan will not solve the problem of traffic congestion or safeguard the designated wildlife areas
The idea that an Area Action Plan will solve these problems is absurd. By the time it is produced it will be too late - the decision to build 2,000 houses at Martlesham will already have been adopted, and it is likely that planning application will have been approved on the basis of 'interim planning policies'.

The impact of boating on the River Deben is ignored
Boats, particularly large motor boats, have a powerful disturbing affect on feeding birds, and they are a major cause of erosion of the fragile saltmarsh ecosystem. This problem dramatically affects the sustainability of SP20 and SP21, but is largely ignored. It will not be solved by relegating it to the Area Action Plan.

The sustainability of SP21 has come down dramatically
It is absurd that the score for SP21 (Felixstowe) remains unchanged at 14.5, despite the number of new houses allocated there having increased by 44%, from 1,000 to 1,440.

The risks of over-reliance on mitigation aren't recognised
It is acknowledged that there is uncertainty as to when a country park could be delivered at the Foxhall tip site, but the assertion is still being made that 2,000 houses at Martlesham will have an insignificant impact on the nearby European sites. This entirely dependent on mitigation appearing at the start of house building, and this looks extremely unlikely to happen.

Appropriate Assessment
Conclusions are not based on up-to-date, scientifically valid data
Important conclusions are drawn about visitor numbers and the impact of the proposed housing on the European sites,
and these conclusions are used to justify the LDF Core Strategy’s policies, particularly SP20 and SP21. These are based on one out-of-date visitor survey of the AONB as a whole (and the South Sandlings Survey (2010) which only covers a small number of sites which aren’t the ones most affected).

There is no up to date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites of concern to the Appropriate Assessment. The AONB as a whole and the European Sites within it are regularly confused, with arguments jumping from one to the other without explanation. A proper, scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife. Without this the conclusions about visitor numbers and their impact on European Sites and their wildlife are little more than guesswork.

The estimate of increases in visitor numbers is seriously flawed.

There are problems with the estimate of increases in visitor numbers:
* It is based on the Suffolk Coast and Heaths AONB survey (2004), which is 7 years out-of-date
* The Suffolk Coast and Heaths AONB survey (2004) cover the whole AONB, not individual sites
* The estimates are based on dubious assumptions, for example, that the relative proportions of day visitors and overnight visitors will not change (A5,3.14) (Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase)
* It is based on the highly implausible assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding.
* The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the new housing proposed in SP20 and SP21 than the average across the AONB.
* The ridiculous claim that people are unlikely to walk further than 1km is still there, despite its flaws having been pointed out on numerous occasions. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.

Information regarding the state of the footpaths around Waldringfield is incorrect

Figure 03, which shows the riverside footpaths north and south of Waldringfield as ‘lost due to erosion’ is misleading. These paths are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

The impact of boating on the River Deben is ignored

No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment. This point has been made many times before and has consistently been ignored.

Unrealistic reliance is placed on mitigation to solve the problems created by SP20 and SP21

Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is totally unrealistic. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

Summary:

Unrealistic reliance is placed on mitigation to solve the problems created by SP20 and SP21

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Change to Plan

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I continue to object to the allocation of 2000 plus houses on the area next to adastral park as the new documents do not change or address the problems of increased visitor numbers to the Deben estuary, with the figures being quoted based on limited data. There is no evidence of the current number of visitors to the estuary let alone sensible projected figures.

The idea that the number of people in the area being based on 1.57 per household is flawed, coming from the oxford study which you yourselves rejected. Large numbers of people in the area will not move into these new houses and even supposing they did that still leaves houses elsewhere in the area to house new families, all increasing the pressure on local amenities including the Deben estuary, schooling, doctors, dentists and not to mention the road network.

The report talks about a park at foxhall but admits this is unlikely to be available when the houses are built so how can this be used as mitigating the loss of other green area?

I have noticed that recently it has been felt necessary to re mark the roundabout at Main road to emphasise the lanes for each turning. This indicates you are aware of the dangers of this roundabout with the current number of cars using it. Therefore increasing these numbers will make this roundabout more dangerous and encourage drivers to use old main road, through Woodbridge or Felixstowe road as a rat run to avoid the roundabout.

The noise from the A12 in nearby gardens is already high with motorised ignoring the speed limits. This is only going to get worse with more houses in the area.

Therefore I strongly object to the provision of so many houses in one area without true details of the increased visitor numbers and householders and their effect on the local area.

Mrs K Cox
11 carol avenue
**Appropriate Assessment for Core Strategy (August 2011)**

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**Respondent:** Deben Estuary Partnership (Christine Block) [2600]  
**Agent:** N/A  
**Full Text:** Local Development Framework - Appropriate Assessment  
August 2011

Comments provided by the Deben Estuary Partnership on those parts of the Appropriate Assessment that focus on the Deben Estuary

The Deben Estuary Partnership (DEP) is a representative community based grouping with wide current and historic knowledge of the River Deben and the estuary area. They are working with the Environment Agency, Natural England, Suffolk Coastal District Council, Suffolk County Council and other organisations and currently partnering the EA and Coast and heaths in developing the Deben Estuary Plan which replaces the concept of an Estuary Strategy compiled by the EA alone.

The DEP commented on the first version of the Appropriate Assessment under three headings - Inaccuracies, Confusing interpretation of data / information used and Factors omitted from the document. They welcome the more detailed comparisons and assessment of policies relevant to the Deben Estuary but wish to comment on some recurring inaccuracies and misleading assessments which, in their view, confuse conclusions.

### Inaccuracies

6.2.22 continues to state that the Deben Estuary near Martlesham is believed to have a low to moderate level of terrestrial recreational activity. This is based on the statement that ‘the estuary side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk’ As previously stated in 2009 the poor repair of the path along the river wall is, in large part, due to the numbers of visitors who, with heavily indented soles to their shoes, ‘walk-off’ the surface of the path and escalate damage. This is recognised in the present work that is using crushed concrete to refurbish the path along the wall and provide an adequate surface suitable for the large numbers of walkers.

Equally inaccurate is the claim that ‘there is no nearby visitor parking’. The nearest official public parking is indeed Woodbridge but the car park by Martlesham church described as available for ‘casual parking’ is rarely empty and it’s ‘casual’ status does not appear to deter visitors once they have discovered its location. The report is accurate when stating (6.2.34) that ‘the number of new visitors using the Martlesham church car park is not trivial.’ (Experience elsewhere on the Deben demonstrates that increasing numbers of visitors are not deterred by limited car parking they do not leave the area when car parks, both public and private, are full but park along narrow roads in the determination to reach and enjoy the river area.)

6.2.37 The report describes footpaths north and south of Waldringfield as eroded and impassable. This implies that walkers do not use the paths while in reality a breach in the north and south river walls prevents a circular walk but does not stop walkers using sections of the path and often diverting onto farmland when they find their route is blocked. These difficulties may limit walking routes but do not eliminate visitors from these sections of the estuary.

### Omission

Throughout the section headed Impact of the Strategic allocation east of Ipswich on Deben Estuary alone or in combination no reference is made to recreational disturbance from river users. Many people moving to new housing allocations will choose to live in the area because it gives them the opportunity to own and use a boat but the Appropriate Assessment does not recognise this significant pressure. It is acknowledged that the number boat owners and those enjoying recreational activities on the river is increasing and is not limited to holiday periods. There are more moorings on the river in a number of locations and membership of yacht and sailing clubs at Waldringfield, Felixstowe, Woodbridge and Bawdsey is substantial. The wash from powered watercraft is a serious factor in saltmarsh erosion - saltmarsh is a factor in assessment of the condition of SPAs. Two pleasure boats now offering trips up and down the river during the summer season encourage increasing numbers of visitors to the riverside.

### Incomplete or confusing information

The paragraphs 5.3.7, to 5.3.17 dealing with calculations to predict visitor numbers are very confusing. The Office of National Statistics predicts a declining household size of around 2.25 people per household in 2027 but a population increase predicted by 2027 requiring an increase of some 11,000 houses is seen as an equivalent to only 1.57 ‘new’ people for every dwelling. Holiday homes are given a zero occupancy. In 5.3.14 data is calculated based on a number of assumptions - one of which is the use of a visitor survey conducted in 2004.

The DEP would draw attention to the use of data from this 2004 Suffolk Coast and Heaths Visitor Survey which they see as no longer providing a reliable evidence base. Recent local knowledge, shared with the Environment Agency in connection with the development of a Deben Estuary Management Plan, drew attention to increasing numbers of tourists coming to various points along the estuary. Promotion of the Suffolk coast as a holiday destination is extending the tourist season. Visitors are coming to the estuary both earlier and later in the year and this extends the likelihood of disturbance to SPA qualifying birds.

5.3.9 states that holiday homes will be considered to have zero occupancy. In terms of potential disturbance to Estuary
sites this seems to contradict recognised patterns of behaviour. Many of the existing holiday or 'second' homes are owned by long standing 'part-time' residents who share their time in Suffolk with work elsewhere. Their visits continue through 12 months of the year and the 'occupancy' of their homes is regularly supplemented by guests who come to enjoy the area. Even when properties are simply holiday lets, attention must be drawn to the growing demand for accommodation and lengthening holiday period.

The Appropriate Assessment notes that, in 6.2.27, some 2000 houses at Martlesham could give rise to increased visitor use causing significant disturbance to SPA birds and trampling of water-edge habitat and a reference is made to a rare snail. Recent environmental analysis of the potential impact of work along this section of wall has highlighted the national significance of colonies of this snail and strict controls have been imposed by Natural England on areas that cannot be disturbed. Following the completion of work new fresh water scrapes will enhance high tide roosts for SPA qualifying birds. The potential degradation of this area of the Deben Estuary caused by increasing numbers of unmanaged visitors is under estimated.

Concluding comments

Methods of mitigation to counteract the impact of any increase in visitor numbers are put forward. The DEP note the cumulative impact that other land-use plans may have on nature conservation sites - the Deben estuary is seen as easily accessible, not only from Martlesham, but Felixstowe and north and east Ipswich. They support the proposals for green space and Country Parks, which could offer alternative recreational facilities - but fail to find adequate evidence in the Core Strategy to demonstrate that these are more than an aspiration.

For green space to be effective designated sites must be close to existing urban areas and new housing development and large enough to cater for a range of recreational activities - particularly dog walking. If residents have to travel any distance to a park it is likely that they will drive on to a favoured area - and, in the case of the Deben, that unquantifiable desire to be 'by the water' will come into play. It is felt that those residents who have time to do so may drive to a chosen destination rather than use a local green space - as is demonstrated every morning by the many dog walkers who drive out of Woodbridge to Sutton Heath.

It should also be noted that many parts of the SPAs do not currently manage visitors - numbers are not restricted, dogs not controlled, alternatives to sensitive sites not signposted - freedoms that many visitors may resist giving up. The cost of introducing visitor management schemes and year round wardens would be substantial.

Drawing an accurate conclusion that there is no adverse effect on European sites must be further qualified by -
* the inconclusive knowledge regarding visitor numbers. References to the possible resultant 'increase of disturbance or trampling damage to qualifying features on estuarine / coastal sites' are difficult to put in an accurate context and it is consequently 'not possible to ascertain that there will be no adverse effect upon the integrity of the Deben estuary SPA'.
* the somewhat limited nature of Natural England's monitoring regime of SPA sites and condition assessments which do not rule out visitor level impact. There are a number of references to the fact that the specific reasons for unfavourable condition do not include visitor / human pressures / recreational impacts when these may indeed be significant factors. The only redress to this is anecdotal evidence which suggests - as in 6.2.13, the Sandlings SPA - that 'current visitor levels are causing harm with dogs off leads having the greatest impact'.
* the lack of guidance on the level of adverse impact that constitutes unacceptable disturbance and damage to a European site

It therefore remains difficult to accept (in 6.2.45) that 'provided that strategic housing proposals for development at Martlesham and Felixstowe Peninsula are greater than 1km from the Deben Estuary' and that there are 'improvements in accessibility to green space provision' it can be concluded that 'there would be no adverse affect upon the integrity of the respective European Sites'.

Christine Block
On behalf of the Deben Estuary Partnership
October 14th 2011

Summary:
The DEP note the cumulative impact that other land-use plans may have on nature conservation sites - the Deben estuary is seen as easily accessible. They support the proposals for green space and Country Parks but fail to find evidence to demonstrate these are more than an aspiration.

For green space to be effective sites must be close to housing and large enough to cater for a range of recreational activities. If residents have to travel any distance to a park it is likely that they will drive on to a favoured area.

It should also be noted that many parts of the SPAs do not currently manage visitors. The cost of introducing visitor management schemes and year round wardens would be substantial.
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**Attachments:**

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### Appropriate Assessment for Core Strategy (August 2011)

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**Respondent:** Dr Sally Mugford [2439]  
**Agent:** N/A

**Full Text:**
- *Please can you explain what dependencies exist for the timely development of a new Country Park?*
- *What is the proposed timescale for the development of the new Country Park?*
- *Will it be ready at the same time as the completion of the “first phase of housing development,” referred to in para 7.2.8?*
- *How confident is SCDC that IBC will definitely supply this need in good time?*
- *Please provide a plan B if IBC decides not to supply this need, or is unable to provide it ready at the same time as the completion of the “first phase of housing development,” referred to in para 7.2.8?*
- *How will the new Country Park be funded?*
- *Will the developers be asked to contribute funds?*

**Summary:** Not enough information about the Country Park.

**Change to Plan**

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In 7.2.10 it is suggested that a Country Park is needed as part of the mitigation and that it should be to the north or north east of Ipswich. However no site has been suggested and no funding for such a site is available. It follows therefore that there will be no mitigation in spite of the commitment given in 7.3.4.
Full Text:

* Please can you explain what dependencies exist for the timely development of a new Country Park?
* What is the proposed timescale for the development of the new Country Park.
* Will it be ready at the same time as completion of "first phase of housing development," referred to in parag 7.2.8?
* How confident is SCDC that IBC will definitely supply this need in good time?
* Please provide a plan B if IBC decides not to supply this need at the completion of "first phase of housing development," (7.2.8)?
* How will the Country Park be funded?
* Will the developers be asked to contribute funds?

Summary:

* Please can you explain what dependencies exist for the timely development of a new Country Park?
* What is the proposed timescale for the development of the new Country Park.
* Will it be ready at the same time as completion of "first phase of housing development," referred to in parag 7.2.8?
* How confident is SCDC that IBC will definitely supply this need in good time?
* Please provide a plan B if IBC decides not to supply this need at the completion of "first phase of housing development," (7.2.8)?
* How will the Country Park be funded?
* Will the developers be asked to contribute funds?
Appropriate Assessment for Core Strategy (August 2011)

3867 Object

7 - Mitigation Mitigation for all proposed housing in Ipswich Borough and Suffolk Coastal District

Respondent: Mr Miles Hopper [2576] Agent: N/A

Full Text:
* Please can you explain what dependencies exist for the timely development of a new Country Park?
* What is the proposed timescale for the development of the new Country Park.
* Will it be ready at the same time as the completion of the "first phase of housing development," referred to in paragragh 7.2.8?
* How confident is SCDC that IBC will definitely supply this need in good time?
* Please provide a plan B if IBC decides not to supply this need at all / or not in time.
* How will the new Country Park be funded?
* Will the developers be asked to contribute funds?

Summary:
* Please can you explain what dependencies exist for the timely development of a new Country Park?
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3872 Object

Mitigation for all proposed housing in Ipswich Borough and Suffolk Coastal District

Respondent: Miss Hannah Hopper [2577]  
Agent: N/A

Full Text:
* Please can you explain what dependencies exist for the timely development of a new Country Park?
* What is the proposed timescale for the development of the new Country Park?
* Will it be ready at the same time as the completion of the "first phase of housing development," referred to in parag 7.2.8?
* How confident is SCDC that IBC will definitely supply this need in good time?
* Please provide a plan B if IBC decides not to supply this need at all, or in time?
* How will the new Country Park be funded?
* Will the developers be asked to contribute funds?

Summary:
* Please can you explain what dependencies exist for the timely development of a new Country Park?
* What is the proposed timescale for the development of the new Country Park?
* Will it be ready at the same time as the completion of the "first phase of housing development," referred to in parag 7.2.8?
* How confident is SCDC that IBC will definitely supply this need in good time?
* Please provide a plan B if IBC decides not to supply this need at all, or in time?
* How will the new Country Park be funded?
* Will the developers be asked to contribute funds?

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments:
3929

Object

7 - Mitigation

Mitigation for all proposed housing in Ipswich Borough and Suffolk Coastal District

Respondent: Mr Jonathan Ruffle [2578]  
Agent: N/A

Full Text:
At 7.2.13 it is stated "The three existing Suffolk County Council country parks currently attract a considerable number of people". This is true: they are standalone country spaces of great beauty and longstanding management.

The idea they resemble anything cooked up by a developer as a bit of grass for dogwalkers is highly misleading and should be removed from this document.

At 7.2.15 we are told that local people living in the AONB will not journey to the estate to sample the delights of the park. No surprises there. But then a very strange conclusion is drawn from that information: "This residual disturbance would be a negative impact compared to the aggregation of smaller provisions across Suffolk Coastal District". This smacks of something that should have been deleted long ago when SCDC unilaterally decided smaller provision didn't suit them, however much it suited local people.

7.2.16: the concept of monitoring 'harm'. Truly, locking the stable door after the horse has bolted. This is the countryside you're destroying -- you've got to have a more subtle tool than that.

Summary:
The country parks quoted at 7.2.13 are nothing like the park proposed for the estate. Section needs deleting.

7.2.15 has a line left over from the days when local people thought they were in a debate on this matter. Authors may prefer to remove it.

7.2.16: the concept of monitoring 'harm'. Truly, locking the stable door after the horse has bolted.

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### 3933 Object

#### 7 - Mitigation

Mitigation for all proposed housing in Ipswich Borough and Suffolk Coastal District

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<td>3933</td>
<td>O - 3933 - 269</td>
<td>Mrs Helga Ballam [269]</td>
<td>N/A</td>
<td>The &quot;suite of mitigation measures&quot; relies on the establishment of a new country park. A site has neither been identified, evaluated nor examined from an economic point of view. Therefore there is no evidence that such a site will be found in the right location and be made available.</td>
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#### Summary:

The "suite of mitigation measures" relies on the establishment of a new country park. A site has neither been identified, evaluated nor examined from an economic point of view. Therefore there is no evidence that such a site will be found in the right location and be made available.

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Mitigation for all proposed housing in Ipswich Borough and Suffolk Coastal District

Unrealistic measures. Hoped for. Better management will destroy the areas that are supposed to be protected.

Unrealistic measures. Hoped for. Better management will destroy the areas that are supposed to be protected.

Not Specified

Unrealistic measures. Hoped for. Better management will destroy the areas that are supposed to be protected.
This letter is the formal submission from Save Felixstowe Countryside to the above consultations, as they affect the Felixstowe peninsula, and wishes to register its objection to all aspects of the consultations. We would ask you to note our comment that your on-line submission system is time-consuming, impossible to search sufficiently to target relevant comments and designed to deter stakeholders from responding.

With regard to sustainability, Save Felixstowe Countryside is concerned at the lack of evidence to support this in the following areas:

Traffic / Mitigation

The A14 to the Orwell Bridge is running at 90% capacity now, and the Port is said to be adding another 100,000+ lorries over the next ten years. 1760 new homes on the Felixstowe peninsula will potentially add another 3000 vehicles to the local road network which is already close to gridlock.

We believe that the LDF traffic mitigation aspirations are completely unrealistic and will have, at best, only marginal impacts on the extra congestion.

Mitigation measures are virtually impossible to put in place as it is unrealistic to limit new residents to the use of public or sustainable transport. Even people who live close to their place of work may choose to go by car as this offers a higher degree of flexibility and comfort than public transport or cycling/walking.

Infrastructure / Mitigation

There is no evidence to support the LDF’s aspiration that developers will provide all/any of the infrastructure necessary to sustain housing numbers on this scale, and would inevitably look to the District to provide whatever was necessary - or the community would go without, which is the more likely option.

Employment / Mitigation

Currently there is almost total reliance on the Port of Felixstowe, with local tourism and service industries being in serious decline. The London Gateway Port at Southend, whose deep-water berth facilities will be available in less than two years, will pose a serious threat to the Port of Felixstowe which itself will be looking to save money and make savings through automation and reducing staff numbers. Their quote of providing 1600 more jobs is seen as propaganda to support their 125th anniversary celebrations, and is unsubstantiated by any evidence.

For the foreseeable future the economic climate does not offer any mitigation against reliance on one employer. Small specialist companies distributed across the District are likely to be the main sources of employment, therefore a sustainable planning policy would place increased housing within reach of those areas in order to reduce the reliance on commuting.

Affordable Housing / Mitigation

Suffolk Coastal has a 1 in 3 policy of Affordable Homes provision. However, in a number of current small developments this policy has been “factored out” as developers strive to build high-end homes in affluent areas. To compensate for this, they will look to concentrate lower-end homes all together, creating a “ghetto” effect which will detract from the quality of life enjoyed by people in the locality at present.

It is acknowledged within the Core Strategy that the future role of foreign economic migrants is not considered within the Plan. Therefore, to restrict Affordable Housing will be to exclude the inevitable influx of members of this group, while a large supply of executive higher-end homes will ensure the continuing influx of people of/nearing retirement age which the LDF does not consider a “sustainable” group.

Environment / Mitigation

Inevitable increases in traffic on the A.14 and local road network will increase air pollution on a peninsula already suffering light and noise pollution from a busy Port. This will have an unavoidable adverse effect on ALL residents which in our view does not support the planning policy as being sustainable.

Landscape / Mitigation

The visual landscape will be destroyed in many parts of the Felixstowe peninsula, and while no-one is entitled to a “view”, taking away a visual amenity is known to have an adverse effect on morale and social behaviour within the local
Appropriate Assessment for Core Strategy (August 2011)

4037 Object

7 - Mitigation

Mitigation for all proposed housing in Ipswich Borough and Suffolk Coastal District

community.

We also do not agree that sustainable development will respect the character of settlements and landscape, as the character of our rural landscape will be completely destroyed by any housing development.

Flooding / Mitigation

The David Lock report identified brownfield land within the peninsula which could accommodate hundreds of homes without any need to touch greenfield land. These sites were subsequently excluded on grounds that they were subject to flooding.

However, the Environment Agency allows development in flood risk areas where the benefits of development outweigh the risks, as long as these developments include mitigation measures to minimise the risk.

Â£10 million is currently being spent on new sea defences which are said to be necessary to protect "1000 homes and businesses for the next 100 years".

These defences would therefore provide the mitigation that would allow brownfield sites previously excluded to be brought back into the equation and preserve greenfield land for agricultural use, which was stated by Suffolk Coastal as one of its priorities following the Orwell Hotel meeting in August 2008.

Appropriate Assessment

The Rt Hon David Cameron, when he wrote to the National Trust, assured us that "sustainable development means maintaining a balance between economic, environmental and social concerns". However, we have seen no evidence of this being taken into account by Suffolk Coastal District Council when putting together its Core Strategy, which we continue to reject as being not economically viable, not environmentally friendly and undertaken without the support of the community.

Your own statements confirming that the above factors were considered during plan preparation would indicate that a thorough and independent examination of the plan and its implications had been undertaken. It is therefore a surprise to find that the main contributors are either employed by, or attached to, Suffolk County Council. As the County Council would itself benefit from new development on this scale, it is questionable whether the appraisal has been independently audited for sustainability and soundness.

General

In summary, Save Felixstowe Countryside rejects the Sustainability Appraisal and Appropriate Assessment consultations in their entirety. We also re-state our objection to the scale of new homes proposed for the Felixstowe peninsula and the proposal to build on greenfield land.

The District Council has now been relieved of its obligation to provide a statutory number of homes, and has been told by its own government to make its decisions in the best interests of the local area. It is our view that what is proposed for Felixstowe is not in the Town's best interests.

Summary: There is no evidence to support the LDF’s aspiration that developers will provide all/any of the infrastructure necessary to sustain housing numbers on this scale, and would inevitably look to the District to provide whatever was necessary - or the community would go without, which is the more likely option.

Change to Plan

Appears at exam? Not Specified

Legal? Not Specified

Sound? Not Specified

Duty to Cooperate? Not Specified

Soundness Tests None

Attachments: full text

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Appropriate Assessment for Core Strategy (August 2011)

4084  Comment

7 - Mitigation

Mitigation for all proposed housing in Ipswich Borough and Suffolk Coastal District

Respondent: Waldringfield Parish Council (Mrs Jean Potter)  [509]
Agent: N/A

Full Text:

An§§ Methods of assessing European site visitor increases from an increased human population

Point 1, Summary:

There is no up to date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites of concern to the Appropriate Assessment. Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"There is a limited amount of data regarding the quantity of visitors to European sites" (An§§1.10). Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available, and can be used to predict increases in visitor numbers from new housing." (An§§1.10). This survey covers the AONB as a whole. It makes no mention of the Deben Estuary SPA/SSSI/RAMSAR Site. Neither does it mention the other SSSIs near to Adastral Park (Newbourne Springs, Ipswich Heaths and Sinks Valley, Kesgrave), because they are not in the AONB.

The only interview locations on the River Deben are at Melton and Bawsey, which are irrelevant to the proposed housing at Adastral Park and Felixstowe. All the interviews were conducted in August, none in spring, autumn or winter. These facts make the AONB 2004 survey completely irrelevant to any prediction of increases in visitor numbers from new housing. In particular, the phrase "can be used to predict increases in visitor numbers from new housing" refers to visitors to the European Sites potentially affected, as listed in An§2.1.2. An§2 (European sites potentially affected) makes no mention of the AONB.

Throughout An§§3 (Calculations to predict additional visitors to European sites across the Suffolk Coast and Heaths AONB using Tourist Board data) the distinction between the AONB and the European Sites is regularly confused. For example:

* in An§§3.5 it says: "Many of the sites in the AONB involved in the visitor study were European sites, so the study is relevant to this Appropriate Assessment." The AONB (2004) study makes no mention of (and certainly does not "involve") any environmentally designated sites, European or otherwise.

* In An§§3.21 it says: "... roughly one-quarter of all visits to the AONB originate from Ipswich Borough and Suffolk Coastal District. This assumption is also applied to the European sites within the AONB." On what basis is this assumption also applied to European sites within the AONB?

* In An§§3.18 it says: "Table 6 shows that the increase in visitors to the Suffolk Coast and Heaths AONB, as a result of the proposed developments is predicted to be 2.83%." In An§§3.25 it says: "To allow for these assumptions, the approximate 2.83% increase in total visitors to the AONB is given as a range of 2% - 5%." (our emphasis). Both of these refer to the AONB, not any European Site or Sites. But then in An§§3.26 it says: "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% ..." No justification is given for jumping from a conclusion about visitors to the AONB to one about visitors to European Sites.

Not only is there a confusion between the AONB and European Sites within the AONB, but no attempt is made in An§§3 to distinguish between individual European Sites. For example, the Deben Estuary SPA is obviously more likely to receive a greater increase in visitors due the proposed housing at Adastral Park than more northerly sites such as the Minsmere-Walberswick SPA, but this is not mentioned. (The discussion of the South Sandlings Survey in An§§5.4 refers to this for the European Sites within the survey area, but of course this does not cover the Deben Estuary, and it does not clarify the confusions in An§§3.)

Point 2, Summary:

The estimate of the net increase in people for the East Ipswich Plan Area, based as it is on 1.57 new people per dwelling, is a serious under-estimate. The figure of 1.57 comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. It contains the absurd hidden assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding. There is no evidence that there is any overcrowding in these villages.

In An§§3.7 to An§§3.13, and particularly in Table 3, an attempt is made to estimate the increase in population due to the proposed housing. To do this it uses the 'number of new people per new dwelling', which in Suffolk Coastal is supposed to be 1.57. This is more realistic than the previous figure of 0.9, but is still seriously flawed. It comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. According to the Oxford Economics Study the occupancy rate in the East was 2.31 (in 2009) decreasing to 2.22 (in 2027), giving an average of 2.27. (p34)

In An§§3.9 the figure of 1.57 is explained: "This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy." It is extremely unlikely that any of the 2,000 dwellings proposed for Adastral Park will be bought for holiday homes, so the difference between the 4,540 (2,000x2.27) new occupants and the 3,140 (2,000x1.57) new people to the area must be accounted for by assuming that 1,400 (4,540-3,140) people will move to Adastral Park because of the fragmentation of multiple person households in the area, and so will not be adding to the number of extra people living near the Deben Estuary. This dubious assumption is not explained or even mentioned, let alone properly justified. It is in fact totally implausible. In order for an occupant of the new housing at Adastral Park not to count as a 'new' additional person, he/she must:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
1. move to Adastral Park from somewhere at least equally near the Deben Estuary (approximately)
2. move out of a multiple person household into one with the same or lower occupancy at Adastral Park
3. not be replaced by anyone moving into the area from further afield
4. not be part of a house-moving chain involving anyone moving into the area from further afield

The only places that qualify for inclusion in (1) are: Waldringfield, Newbourne, Hevely, Brightwell, Martlesham Village and Martlesham Heath (just). Kesgrave and Grange Farm are roughly twice the distance from the Deben Estuary so can be excluded, and Woodbridge can be excluded because although it is on the River Deben, it is not on a sensitive part: "the Deben Estuary is not assessed by Natural England as being unfavourable due to human disturbance" (Å6.2.35). The combined populations of these 6 villages is 6,630, so the Appropriate Assessment contains the absurd hidden assumption that 1,400 (21%) of the residents of these villages will move to Adastral Park because of pressures of over-crowding. There is no evidence that there is any over-crowding in these areas, or that there is any desire for the residents to move to the proposed housing at Adastral Park - the idea is quite ludicrous.

The upshot of this is that the figure of 3,462 for the 'Estimated net increase in people' for the East Ipswich Plan Area, (Table 3), based as it is on 1.57 new people per dwelling, is a serious under-estimate. It is far more likely that the entire population of the 2,000 new houses at Adastral Park will come from outside the immediate area, and will be about 4,540 (2,000x2.27).

The same criticism can be applied to the Felixstowe, Walton and the Trimleys figure of 2,763 (Table 3).

Point 3, Summary:

The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing 5% as the upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.

The actual increase in the number of people visiting the sites is not given, because the current number of visitors is unknown (because of the lack of a proper survey - see above).

The assumptions given in Å5.3.14 are all highly dubious (except one):
* "the pattern of day visits to sites by the new residents is similar to that of the existing population" This is very unlikely.
* The proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries.
* "the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey" It is not clear if ‘sites’ is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.
* "an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity” OK, this is an acceptable assumption.
* "the relative proportions of day visitors and overnight visitors does not change" This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to - be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is as follows:

The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing 5% as the upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.

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Point 3, Summary:

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The actual increase in the number of people visiting the sites is not given, because the current number of visitors is unknown (because of the lack of a proper survey - see above).

The assumptions given in Å5.3.14 are all highly dubious (except one):
* "the pattern of day visits to sites by the new residents is similar to that of the existing population" This is very unlikely.
* The proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries.
* "the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey" It is not clear if ‘sites’ is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.
* "an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity” OK, this is an acceptable assumption.
* "the relative proportions of day visitors and overnight visitors does not change" This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to - be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

Table 4 (Å5.3.13), second column reads ‘Estimated increase in people (table 2)’. The data is actually taken from Table 3.

Table 5 (Å5.3.16), second column reads ‘proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1’. The data is actually taken from Table 2.

The calculations in Table 5 and described in Å5.3.15 are an attempt to predict the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as stated in the title of Table 6. However, in several places the restriction (in bold above) is not made clear, for example in Å5.3.14-16. This gives the impression that it predicts the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from all potential sources. 50.5% of the total day visitors to the AONB come from outside Suffolk Coastal and Ipswich Borough/Pinewood. Increases in the populations in the areas these people come from have been excluded from the calculations. This is unrealistic - Babergh, Tendring, Waveney and all the other nearby districts all have LDF Core Strategies that propose large housing allocations and correspondingly large increases in populations.

The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as described in Å5.3.15 and shown in Table 5, is logically flawed. Column A only includes day visitors who live in Suffolk Coastal and Ipswich Borough/Pinewood. In Column B this is multiplied by the proportion of visitors who are day visitors (55%). However, the figure of 55% applies to visitors from all locations, not just those from Suffolk Coastal and Ipswich Borough/Pinewood. Common sense tells us that local visitors are more likely to be on day trips than those coming from further afield, and this is confirmed by comparing Map3 (p11) with Map 4 (p12) in the Suffolk Coast and Heaths AONB Survey (2004). It is therefore reasonable to assume that a far larger value than 55% should be used as the multiplier in Column B (the data shown in the Suffolk Coast and Heaths AONB Survey (2004) isn’t sufficiently detailed to tell us what the value should be.). In fact it would be much more realistic to have different multipliers for the different areas - for example we know that about 95% of visitors to Martlesham are on day trips (Suffolk Coast and Heaths AONB Survey (2004) Chart 3), so if most of these came from
Mitigation for all proposed housing in Ipswich Borough and Suffolk Coastal District

the East Ipswich Plan Area we could use 95% as the multiplier in Column B, 2nd row.

Two of the three assumptions given in Â§5.3.23 are highly dubious:
* "'New' people in the Borough / District will have the same visiting pattern as 'existing' people" This is very unlikely - see comments on Â§5.3.14, first bullet point
* "Visits by holiday makers will not be affected by any increased use by local visitors" It is possible that over crowding at popular sites will put off holidaymakers. Holiday makers generally want to visit unspoiled countryside; the urbanisation resulting from the housing allocations, particularly at Adastral Park, is very likely to deter holidaymakers.
* "Sites, including their car parks, will not constrain the number of visits by becoming 'full' and turning away visitors" OK, this is an acceptable assumption.

The uncertainties in the calculations are acknowledged by the vagueness of the conclusion (Â§5.3.26): "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% as a result ... " It would also be reasonable to assume that the increase is far higher than 5%. What justification is there for choosing 5% as the upper limit rather than, say, 10%? The flaws in the methodology, the likelihood that the assumptions in Â§5.3.14 and Â§5.3.23 are invalid, and the inappropriateness of using the Suffolk Coast and Heaths AONB Survey (2004) results in the first place all combine to make this conclusion completely worthless.

Point 4, Summary:
The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the proposed new housing in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area than the average across the AONB. One would expect the increase in the Orwell and Deben Estuary SPAs to be far greater than the 8.8% estimated for the South Sandlings area. Nowhere is this obvious conclusion stated.

Another reason the figure of 2-5% is worthless is that it is an average across the whole of the AONB. 77% of the proposed new housing is in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area, all of which are far closer to the Orwell and Deben Estuaries than the other European Sites in the AONB, and these sites will therefore receive a far greater increase in visitors than the average across the whole of the AONB. Even if the figure of 2-5% is correct it tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs. This point is made in Â§5.8.1 with regard to the South Sandlings area "Fewer people living in or east of Ipswich might visit distant parts of the AONB compared to the South Sandlings, thus having a smaller impact over the AONB", but unfortunately the obvious extension of this argument to the Deben and Orwell Estuaries hasn't been made.

"It is a reasonable assumption that an increase in dwellings would generate a proportionate increase in visitors from any particular distance band. For example, if the number of houses doubled in a particular distance band the number of visitors from that area would also double" (Â§5.6). We agree with this. It is a pity that this logic can't also be applied to the impact on the Deben Estuary of the 2,000 houses proposed for Adastral Park. The calculation method described in Â§5.5.9 and Â§5.10 seems to be far more realistic than those used in Â§5.3 (criticised above), and there seems to be no good reason why it couldn't also be applied the Adastral Park - Deben Estuary situation if basic data on visitor numbers were known.

"The distribution of proposed housing is not precisely specified within the Core Strategies." (Â§5.7) This is not entirely true. One of my main complaints about the SCDC LDF Core Strategy is that it is very site-specific; 2,000 houses 'to the south and east of Adastral Park' could hardly be more site-specific.

In Â§5.5.12 the increase in the number of visitors to the South Sandlings area as a result of the Ipswich and Suffolk Coastal Core Strategies is predicted to be 8.8% (broadened to 6-12% in Â§5.5.14). Most of the housing proposed in these Core Strategies is far nearer to the Deben Estuary than it is to the South Sandlings area, so one would expect the increase in the number of visitors to the former to be far greater than 8.8%. Nowhere is this obvious conclusion stated. (No estimate is given for the increase in the number of visitors to the Deben Estuary as a result of the Ipswich and Suffolk Coastal Core Strategies, which is a pity as this is the SPA most affected by the extra housing.)

Point 5, Summary:
The claim that people are unlikely to walk further than 1km is absurd. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.

Throughout Â§5.6 various references are made to the ridiculous claims that people are unlikely to walk further than 1km or drive further than 8km. For example: "...only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur..." (Â§5.6.6). These are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed.

The 1km figure is invalid because:
1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked less than 1km was that the 1km was less than 1km from the site, so didn't need to walk further.
3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.
The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. The inappropriateness of the 1km figure is borne out by the Deben Estuary Survey, which shows that 57.1% (far more than the 11% in Dorset) of visitors to the River Deben who arrived on foot walked more than 1km (Deben Estuary Survey, Á§2.19). The average distance travelled by people on foot (3.8km) easily puts the Deben Estuary SPA within the orbit of the proposed LDF Core Strategy site at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption.

“... the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk” There is nothing wrong with the estuary-side path, it is perfectly walkable for about 2.5km up to the breach opposite Methersgate Quay.

We agree with the conclusion in Á§6.2.30: “It therefore cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA near Martlesham”. However, this is then contradicted in Á§6.2.31: “Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the greenspace provision is adequate, it is unlikely that many visitors would walk from their home to the estuary, so this recreational activity would not substantially increase on the foreshore of Deben Estuary SPA at Martlesham, and there is expected to be no new high levels of disturbance ...”. The assumption that people won't walk more than 1km is invalid (see our comments on Á§5.6 above), and the reliance on greenspace provision is equally flawed (even if the greenspace appears in time, which is doubtful) - see our comments on Á§7, below. The Deben Estuary Survey showed that 32% of visitors on foot walked more than 3km to the Deben Estuary at Martlesham (Deben Estuary Survey, Á§2.19).

"This limit to parking suggests that there is limited availability for an increase in visitors arriving by car to Waldringfield. “... ”Given the limit to available parking the increase in visitors walking along the estuary might be less than that predicted.” (Á§6.2.35) Obviously the parking space is ‘limited’, i.e. it isn’t ‘infinite’! In fact there is space for about 75 cars in the public parking area and about 22 in the patrons only area. However, too much emphasis has been placed on the "limit to available parking" - this only applies at peak times, most of the year there is plenty of space. A letter to the Chair of Waldringfield PC from the manager of the Maybush, dated 16/2/10 says: "... the car park, generally, is not at capacity at any other time than school holidays, bank holidays and weekends. It is however often at capacity during these times out of our hours i.e. before 11am if the weather is fine and/or there is an event on at the sailing club." When the car park is full visitors aren't necessarily deterred - it is common for visitors to park in Cliff Road, and recently in Church Field Car Park, causing extra congestion (Cliff Road is narrow and single lane in places).

"It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2.5 - 3km from the Deben Estuary Survey at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption."

"The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings" (Á§5.8.5). Whilst this is factually correct, its significance is questionable, as the Deben Estuary Survey did not cover the winter period, it simply asked interviewees if they also visited in the winter.

"The Deben Estuary visitor survey... does not have the data or analysis to predict changes in visitor numbers" (Á§5.8.8). This is partly true, a more comprehensive survey carried out by professionals would be needed for that. The survey says: “We hope that the data we have collected is helpful in providing some baseline information from which further studies can be conducted or more realistic projections made regarding increased visitor numbers resulting from the Adastral Park, Martlesham development and the consequent impact on the wildlife.” (Deben Estuary visitor survey, Á§1.9). The point is that the Appropriate Assessment makes predictions of increases to visitor numbers without any data on current visitor numbers, so although the Deben Estuary visitor survey isn’t scientifically rigorous, it is better than nothing.

Á§6.2 Policy SP2. Housing numbers

Point 8. Summary: The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The conclusion that it is unlikely that many visitors would walk from their homes to the Deben Estuary SPA at Martlesham, and that there is expected there will be no new high levels of disturbance, are based on the flawed assumption that people won't walk more than 1km and an unrealistic reliance on greenspace provision.

"... the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk" There is nothing wrong with the estuary-side path, it is perfectly walkable for about 2.5km up to the breach opposite Methersgate Quay.

We agree with most of Á§6.2.28, although the location of the proposed housing is known precisely - it is 'To the south and east of Adastral Park' see comments on Á§5.6.7, above.

We agree with the conclusion in Á§6.2.30: “It therefore cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA near Martlesham”. However, this is then contradicted in Á§6.2.31: "Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the greenspace provision is adequate, it is unlikely that many visitors would walk from their home to the estuary, so this recreational activity would not substantially increase on the foreshore of Deben Estuary SPA at Martlesham, and there is expected to be no new high levels of disturbance ...”. The assumption that people won't walk more than 1km is invalid (see our comments on Á§5.6 above), and the reliance on greenspace provision is equally flawed (even if the greenspace appears in time, which is doubtful) - see our comments on Á§7, below. The Deben Estuary Survey showed that 32% of visitors on foot walked more than 3km to the Deben Estuary at Martlesham (Deben Estuary Survey, Á§2.19).

"It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2 - 2.5km from the Martlesham church car park (The Deben Estuary Visitor Survey by NANT of July 2011 gives 2.5km)." (Á§6.2.34) It depends on whether this distance is 'as the crow flies' or by the shortest road route. The Deben Estuary Survey actually states them as 1.6km and 3.0km respectively (Deben Estuary Survey, §3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.2km.

Point 7. Summary: The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren't necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as 'lost due to erosion' is grossly misleading. The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The inappropriateness of the 1km figure is borne out by the Deben Estuary Survey, which shows that 57.1% (far more than the 11% in Dorset) of visitors to the River Deben who arrived on foot walked more than 1km (Deben Estuary Survey, Á§2.19). The average distance travelled by people on foot (3.8km) easily puts the Deben Estuary SPA within the orbit of the proposed LDF Core Strategy site at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption.

"... the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk” There is nothing wrong with the estuary-side path, it is perfectly walkable for about 2.5km up to the breach opposite Methersgate Quay.
estuary at Waldringfield (The Deben Estuary Visitor Survey by NANT of July 2011 gives 3km).”  (§6.2.35) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 2.0km and 2.5km respectively (Deben Estuary Survey, Â§3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.1km.

"Estuary-side footpaths north and south of Waldringfield are eroded and impassable, according to data received from Suffolk County Council in August 2011 (see Figure 03). This limits the walking routes available from Waldringfield."  (Â§6.2.36), Figure 03 shows the footprint extending about 1km north of Manor House and about 1.5km south of the reservoir as ‘Section lost due to erosion’. This is completely untrue and is grossly misleading. In fact the path north of Waldringfield is breached opposite Methersgate Quay about 2/3 of the way along the section shown as ‘lost’, and the path south of Waldringfield is breached just beyond Early Creek, at the southern end the section shown as ‘lost’. In places these paths can get muddy in poor weather, but otherwise are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

Point 8, Summary:
The conclusion that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA is based on the invalid assumption that people won’t walk more than 1km, and the unrealistic reliance on greenspace provision. "It can be ascertained that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA, given a location well over 1km from the estuary and with adequate greenspace provision.”  (Â§6.2.42). This is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on Â§5.6), and the unrealistic reliance on greenspace provision - see our comments on Â§7.

"It is therefore concluded that there would be no adverse affect upon the integrity of the respective European sites.”  (Â§6.2.45). Again, this is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on Â§5.6), and the unrealistic reliance on greenspace provision - see our comments on Â§7.

Point 9, Summary:
No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment. No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is important because: "On one estuarine site, disturbance to birds from boats was thought to be the biggest problem”  (Â§5.7.6). Motor boats and jet skis, which create a large wake, also contribute to erosion of the river banks, endangering the delicate saltmarsh ecosystem. This is a serious omission from the Appropriate Assessment.

Â§7 Mitigation

Point 10, Summary:
The Appropriate Assessment places great reliance on the creation of a new country park as mitigation. This is despite the fact that no actual mitigation site has been found, nor is there any timetable for this creation of this hypothetical green space. Even if a site is found it will not have any of the attractive features of the Deben Estuary, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary. The Appropriate Assessment places great reliance on the creation of a new country park, which it claims will provide mitigation by diverting visitors (and particularly dog walkers) away from the Deben Estuary. No specific site is suggested, although a location vaguely described as “to the north or north-east of Ipswich” is proposed (Â§7.2.10).

However, no mention is made of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Various wish-lists of desirable features of this mitigating greenspace are presented throughout Â§7.2. However, the ones that could actually attract visitors away from the Deben Estuary are conspicuous by their absence. Most people who visit the Deben Estuary do so because of the river. They walk along its banks, their children play on the beach and swim in the river, they sail, fish, birdwatch and engage in many other river-based activities, and of course the Maybush at Waldringfield attracts people from far and wide. A country park will not have any of these attractive features, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

There isn’t an abundance of suitable sites “to the north or north-east of Ipswich”. The phrase “to the north or north-east of Ipswich” suggests that it is likely that the site will be west of the A12, and if this is the case then the Deben Estuary will be far more accessible to the residents of the proposed Adastral Park development than the mitigation site, as the A12 presents a significant barrier to walkers.

Following the dubious logic of the Appropriate Assessment, if the mitigating greenspace is more than 1km from the development, visitors are unlikely to walk there. A circle of radius 1km from Adastral Park barely reaches beyond Martlesham Heath to the west or Tesco’s car park to the north, an area that contains no significant candidate spaces, so it is difficult to see where this greenspace could come from. Unless, that is, people are expected to drive to the mitigation site, in which case it won’t have any effect on visitors going to the Deben Estuary on foot, but will increase traffic congestion west of the A12.

Recent evidence from Dorset casts serious doubt on the effectiveness of alternative greenspace in mitigating against increases in visitors to environmentally sensitive sites: “Almost all responding households had some ‘Other’ greenspace within 1.5km. The presence of this ‘Other’ greenspace had no apparent effect on reducing either the likelihood or frequency of visiting heaths.... Some of the results suggest that people with more greenspace surrounding their homes may actually visit heaths more.... The most critical conclusion is that there appears to be only a slender relationship between the amount of (existing) alternative greenspace nearby and the amount of heathland visits” (East Dorset District Council Public Report - Household Survey, Footprint Ecology, May 2009, p27).

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
No change has been made to the conclusions on mitigation (§7.4): “It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site.” This of course depends on the mitigation being implemented and available at the start of house building. However, even if it is, it is highly unlikely that “the impacts of additional housing provisions in Policy SP2 and related policies ... will be reduced to an insignificant level” (§7.4.1). Where is the evidence that this (as yet hypothetical) mitigation will reduce the ‘adverse effect’ to an ‘insignificant level’? The current number of visitors to the European sites isn’t even known, and the increase isn’t known either, so how can it be said with confidence that this increase will be eradicated with appropriate mitigation? It is pure speculation, without any basis in fact.

§8 Conclusions

Point 11, Summary:
Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

"It is concluded that policy SP2 would have an adverse effect upon the integrity of a number of European sites, alone and in combination with the Ipswich Borough Core Strategy and Policies." (Å§8.6.1). This we do agree with. "Mitigation is proposed which, if implemented, would reduce the adverse effect to an insignificant level and would enable a conclusion that it can be ascertained that there will be no adverse effect upon the integrity of any European site." (Å§8.6.1). As explained above, given that no sites or funding have been found, mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. We believe there is no justification for this optimism, and that it is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

Å§9.2 Further work needed

Point 12, Summary:
It is claimed that further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. Yet it is acknowledged that the data upon which major decisions have been based is poor. No attempt will be made to get better data before the decisions are formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment’s conclusions. This is not how decision making is supposed to work.

"Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected.” (Å§9.1.1). This decision was made in 2009. If SCDC had instead decided to commission a proper visitor survey at that time, it would probably be complete by now (2 years later), and could have provided a far more reliable basis for assessing the impact of the housing proposed in the Ipswich Borough and Suffolk Coastal Core Strategies.

Having acknowledged that the data is poor, the Appropriate Assessment makes the highly dubious claim that: “further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress.” (Å§9.2.3) So a major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment’s conclusions.

Summary:
The Appropriate Assessment places great reliance on the creation of a new country park as mitigation. This is despite the fact that no actual mitigation site has been found. SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Even if a site is found it will not have any of the attractive features of the Deben Estuary, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.
Mitigation and the much mentioned "Country Park" are put forward as protections for the European sites, but there are contradictions both within the Core Strategy and within common knowledge of SCC financial position. Where is the Country Park to be? Who will pay for its development and maintenance? When will it be available? The original suggestion of the Foxhall tip site (6.5 SP20) seems highly unsuitable, will there be a ban on smoking, barbecues and fireworks because of methane, will any ponds be carefully monitored for tip leachate? Noth the "high quality provision" (7.2.9) that people are being led to expect.

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Mitigation for all proposed housing in Ipswich Borough and Suffolk Coastal District
### Appropriate Assessment for Core Strategy (August 2011)

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<th>Object</th>
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<td>3863</td>
<td>7 - Mitigation</td>
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**Respondent:** Mr Jonathan Hopper [2575]  
**Agent:** N/A

**Full Text:** General: Please explain how you will ensure that the mitigation you recommend is indeed carried out, and what steps will be taken if the developers fail to comply.

**Summary:** General: Please explain how you will ensure that the mitigation you recommend is indeed carried out, and what steps will be taken if the developers fail to comply.

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### 3864  Object

| 7 - Mitigation | Table 10 |

**Respondent:** Mr. Jonathan Hopper [2575]  
**Agent:** N/A

**Full Text:** General: Please explain how you will ensure that the mitigation you recommend is indeed carried out, and what steps will be taken if the developers fail to comply.

**Summary:** General: Please explain how you will ensure that the mitigation you recommend is indeed carried out, and what steps will be taken if the developers fail to comply.

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Also, the AA still draws upon out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey whilst being acknowledged have not been properly examined and therefore their findings have been ignored in the conclusions.

Summary:
Also, the AA still draws upon out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey whilst being acknowledged have not been properly examined and therefore their findings have been ignored in the conclusions.

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Attachments:
3786 Object

7 - Mitigation

Suffolk Coastal District

Respondent: Dr Sally Mugford [2439]  
Agent: N/A

Full Text:  
Parag 7.3.1: Please define "...adequate green space...".
Parag 7.3.1: Please define "...to suitable standards...".

Summary:  
Parag 7.3.1: Please define "...adequate green space...".
Parag 7.3.1: Please define "...to suitable standards...".

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Not Specified Not Specified Not Specified Not Specified None

Attachments:
3862 Object
7 - Mitigation Suffolk Coastal District

Respondent: Mr Jonathan Hopper [2575] Agent: N/A

Full Text:
Parag 7.3.1: Please define "...adequate green space...".
Parag 7.3.1: Please define "...to suitable standards...".

Summary:
Parag 7.3.1: Please define "...adequate green space...".
Parag 7.3.1: Please define "...to suitable standards...".

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Attachments: None
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**Object**

7 - Mitigation

**Respondent:** Miss Hannah Hopper [2577]  
**Agent:** N/A

**Full Text:**

Parag 7.3.1: Please define "...adequate green space...".
Parag 7.3.1: Please define "...to suitable standards...".

**Summary:**

Parag 7.3.1: Please define "...adequate green space...".
Parag 7.3.1: Please define "...to suitable standards...".

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3930  Object
7 - Mitigation       Suffolk Coastal District

Respondent: Mr Jonathan Ruffle [2578]  Agent: N/A

Full Text:
7.3.4: "It is clear that Suffolk Coastal District is committed to providing the necessary mitigation for the impacts caused by its housing allocations."

Clear to who? Provision, location, cost, who is going to pay, none of these are made clear by this document.

Summary:
7.3.4: "It is clear that Suffolk Coastal District is committed to providing the necessary mitigation for the impacts caused by its housing allocations."

Clear to who? Provision, location, cost, who is going to pay, none of these are made clear by this document.

Change to Plan

Not Specified  Not Specified  Not Specified  Not Specified  None

Attachments:
3937  Object
7 - Mitigation  Suffolk Coastal District

Respondent:  Mrs Helga Ballam [269]  Agent: N/A

Full Text:  the AA still draws upon out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey whilst being acknowledged have not been properly examined and therefore their findings have been ignored in the conclusions.

The "suite of mitigation measures" relies on the establishment of a new country park. A site has neither been identified, evaluated nor examined from an economic point of view. Therefore there is no evidence that such a site will be found in the right location and be made available.

Summary: the AA still draws upon out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey whilst being acknowledged have not been properly examined and therefore their findings have been ignored in the conclusions.

The "suite of mitigation measures" relies on the establishment of a new country park. A site has neither been identified, evaluated nor examined from an economic point of view. Therefore there is no evidence that such a site will be found in the right location and be made available.

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The assumption throughout this is that you can provide an alternative that people can use. How can you provide an alternative to the river Deben?
3833  Object
7 - Mitigation  7.4: Mitigation Conclusions

Respondent: Mr James Barclay [2495]  Agent: N/A

Full Text: This conclusion is unsound as the mitigation required is not in place nor is it planned to be in place.

Summary: This conclusion is unsound as the mitigation required is not in place nor is it planned to be in place.

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Attachments:
Object 7 - Mitigation 7.4: Mitigation Conclusions

Full Text: There is no detail on the "country park" proposed as a mitigation measure. This needs much more detailed and relevant debate.

Summary: There is no detail on the "country park" proposed as a mitigation measure. This needs much more detailed and relevant debate.

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General: Please explain how you will ensure that the mitigation you recommend is indeed carried out, and what steps will be taken if the developers fail to comply.

Respondent: Mr Miles Hopper [2576]  
Agent: N/A

Summary: General: Please explain how you will ensure that the mitigation you recommend is indeed carried out, and what steps will be taken if the developers fail to comply.

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General: Please explain how you will ensure that the mitigation you recommend is indeed carried out, and what steps will be taken if the developers fail to comply.
Also, the AA still draws upon out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey whilst being acknowledged have not been properly examined and therefore their findings have been ignored in the conclusions.

The "suite of mitigation measures" relies on the establishment of a new country park. A site has neither been identified, evaluated nor examined from an economic point of view. Therefore there is no evidence that such a site will be found in the right location and be made available.

Also, the AA still draws upon out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey whilst being acknowledged have not been properly examined and therefore their findings have been ignored in the conclusions.

The "suite of mitigation measures" relies on the establishment of a new country park. A site has neither been identified, evaluated nor examined from an economic point of view. Therefore there is no evidence that such a site will be found in the right location and be made available.
The mitigation proposals are fundamentally flawed. Anyone going for a walk from the BT development is going to go in a SE direction taking them immediately into the AONB and within 20 minutes into the areas of the European sites. Where and how big will the proposed country park be? What landscape will it offer? Will it be within walking distances of the new housing or will the public be expected to drive? Why will they prefer this to the existing AONB? The LDF should not be determined until full details of the mitigation plans are available.
**Appropriate Assessment for Core Strategy (August 2011)**

**Object**

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<th>7.4: Mitigation Conclusions</th>
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**Respondent:** Mr David Bucknell [2714]  
**Agent:** N/A

**Full Text:**  
The mitigation proposed is totally inadequate. I live on Bawdsey Quay. The impact will be considerable. The only way of managing this will be to fundamentally change the character of the area. This will be justified in the name of mitigation. We only need the mitigation because of what has been proposed in the first place.

**Summary:**  
The mitigation proposed is totally inadequate. I live on Bawdsey Quay. The impact will be considerable. The only way of managing this will be to fundamentally change the character of the area. This will be justified in the name of mitigation. We only need the mitigation because of what has been proposed in the first place.

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**Attachments:**
Appropriate Assessment for Core Strategy (August 2011)

4025 Object
7 - Mitigation 7.4: Mitigation Conclusions

Respondent: Gill Glen [2400]  Agent: N/A

Full Text: I object to the revised sustainability appraisal and appropriate assessment of the core strategy on the grounds that there are a large number of errors in the document. I highlight the main ones below.

APPROPRIATE ASSESSMENT

Table 3 estimates the increase in population as a result of the proposed housing. It takes a value of 1.57 as the number of new people per dwelling. No justification is provided for this value. Since the total number of people arising from these houses is a key input to this report this is unacceptable. Either this number is justified or a much higher number assumed to provide a margin of error. In any case the conclusions based on this value are suspect and should be identified as such. Further on in the document it states that the low figure of 1.57 is due to an unstated assumption that roughly one third of the future residents of any new housing will move out of existing housing in the area and hence will not be adding to the number of extra people living near the sensitive sites. This is an unproven assertion and again any conclusions based on this should be removed unless it can be proven or justified.

The document comments about lack of parking in the area limiting the number of people visiting. But this only applies at peak times. For the majority of the time parking is not an issue.

The document states "Estuary-side footpaths north and south of Waldringfield are eroded and impassable ... This limits the walking routes available from Waldringfield." This is true but does not mean that no one will ever use the path. It is still used along its navigable part.

Having acknowledged that the data is poor, the assessment makes the unsupportable claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." Since a major planning decision is being made on this evidence it beggars belief that the council can ignore this fundamental weakness. There appears to be no intention of obtaining any further evidence either. Is this because it might actually contradict the conclusions of this assessment?

No change has been made to the conclusions which the assessment reaches regarding mitigation: "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This is only true if mitigation is actually implemented and is available at the start of house building. There is no mention of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

The impact of extra people visiting the Waldringfield area is discussed in the document. There has been no alteration of the unsubstantiated claim that people are unlikely to walk further than 1km or drive further than 8km. These claims are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed. The 1km figure is invalid because:

the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing.
the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. This was confirmed by a study made by NANT, which showed that people walked an average of 3.8km to the Deben Estuary.
Although the document admits that there is only a small amount of data regarding visitor numbers to sites in Europe it goes on to draw a significant number of important conclusions from this data. This is a flawed approach and requires either more data to substantiate the claim or that the conclusions drawn be removed form the document.

Finally the true increase in the number of people visiting the sites cannot be given because the current number of visitors is unknown as no accurate survey has been undertaken.

SUSTAINABILITY APPRAISAL

In the review of SCDC’s responses to consultation comments on the sustainability assessment and Reviewed Core Strategy many of the responses are inadequate and many simply state “No change to SA required” without any attempt to justify why this might be. Given the significance of the core strategy this is not acceptable.

This policy is described as “marginally more sustainable” by virtue of “the creation of a countryside park on the Foxhall tip by the end of the plan period”. The reference to the Foxhall Tip is contradicted in the last paragraph where it states that designated areas will need to be safeguarded “by providing open space as part of the housing development at the beginning of the development”. Also it is pointed out that “Foxhall Country Park is unlikely to be developed within the plan period”. Consequently the policy is not more sustainable than before and in fact is less sustainable since no proposals have been made for any countryside parks at the beginning of the development.

Only the briefest mention is made of the potential impact of increased boating activities on the River Deben. In fact this is a potentially serious problem and has been ignored and passed across to the area action plan. Large boats, and particularly motor boats, have a powerful disturbing affect on feeding birds, and they are a major cause of erosion of the fragile saltmarsh ecosystem. This point has been made several times by NANT and Waldringfield PC and has been consistently ignored.

The document states “There is uncertainty as to when a country park could be delivered at Foxhall tip”. The key point is that it will not be in place when any development on the 2,000 houses at Martlesham begins. In spite of this the assertion is still present in the document that these 2,000 houses will have an insignificant impact on the nearby European sites. This will only be the case if mitigation appears at the start of house building, and is very unlikely to happen.

Summary: No change has been made to the conclusions which the assessment reaches regarding mitigation: “It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site.” This is only true if mitigation is actually implemented and is available at the start of house building. There is no mention of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

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Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I OBJECT to the findings in the AA and SA as follows:

1. Assessment of European site visitor increases

**OBJECTION**

**Summary**
The data regarding visitor numbers to the Deben SPA is acknowledged to be inadequate - i.e. none exists apart from the Deben Visitor Survey (NANT). Therefore projections regarding the increase in visitor numbers resulting from the proposed housing at Adastral Park are guesswork. As are the resulting projections of potential damage and disturbance to environmentally sensitive sites. It behoves SCDC to conduct proper rigorous studies of visitor numbers to the Deben SPA to create a baseline against which to make realistic assessments.

2. Impact on specific sites

**OBJECTION**

**Summary**
It is inappropriate to attempt to predict the impact on the Deben SPA of the inhabitants of 2000 houses at Adastral Park from studies relating to completely different habitats (i.e. Dorset heathland) which are not comparable. The Deben is a tidal estuary, beautiful, remote, wild with many special environmental features and other attractions. NANT’s Visitor Survey showed clearly what a draw the river is and that people with dogs walk/drive a great deal more than 1/8kms suggested here. Proper relevant research needs to be done.

3. Assessment of Policy SP2 Housing numbers

**OBJECTION**

**Summary**
The potential for problems and threats to the integrity of the Deben SPA from siting housing at Adastral Park is acknowledged (6.2.28 and 6.2.30) but SCDC continue to assert wrongly (see above) that people will walk/drive only 1/8kms. The need to provide adequate alternative green space is stated without indicating where/what that might be (see below). Contrary to what is stated at 6.2.35 there is now considerable public car parking available in Waldringfield thus increasing the attractiveness of the location. Contrary to what is stated in 6.2.36 the available riverside route remains attractive for walkers (see below).

4. Mitigation for Policy SP2

**OBJECTION**

**Summary**
It is disingenuous to continue to insist that the housing policies will have "no adverse effect" on the integrity of the Deben Estuary SPA (7.4.1). The discredited 1km figure is wheeled out again to justify development at Adastral Park (7.2.6). Provision of alternative green space should "precede or coincide with" Phase 1 of housing development (7.2.8). Although the idea of a country park is talked up the reality is that no site is available to precede of coincide with phase 1 and anyway SCC no longer funds country parks so it is a matter of pure speculation.

5. Limitations to the Assessment - Further work needed

**OBJECTION**

**Summary**
It is scandalous that having admitted that this policy is based on poor and inadequate data SCDC let themselves off the hook by claiming that they don't need to improve the quality of the data before adopting the Core Strategy and therefore opening the door to the building of 2000 houses at Adastral Park. SCDC need to make policy on the basis of sound and robust data not guesswork and speculation when so much is at stake.

Sustainability Appraisal

1. Appraisal of Core Strategy Policies - Ipswich Policy Area (SP20)

**OBJECTION**

**Summary**
It is incorrect to claim that SP20 is "marginally more sustainable" because the policy "seeks to preserve and enhance environmentally sensitive locations" by creating a country park at Foxhall Tip by the end of the plan period. AS stated above alternative green space has to be available at the beginning of the development to act as so-called mitigation in relation to building at Adastral Park.

2. SP20 Ipswich Policy Area

**OBJECTION**

**Summary**
It is unacceptable to devolve responsibility for safe-guarding Waldringfield and the Deben Estuary to an Area Acton Plan. Issues like congestion, traffic impacts and the increasing number of boats on the river causing problems to feeding birds and erosion of saltmarsh, the preservation of wildlife and habitat all need to be addressed now otherwise the policy is utterly flawed. The LDF needs to be based on robust policies that have addressed these problems and issues at the outset rather than kicking them into the long grass of an AAP.
3. Ipswich Policy Area SP20

**OBJECTION**

**Summary**

Again the discredited figure of 1km (see above) is used here to suggest that the integrity of the Deben Estuary can be maintained so long as building is more than 1km away from the river. The NANT survey showed that people walk much more than 1 km and therefore 2000 houses at Adastral Park will generate a huge increase in visitor numbers. SCDC are also wrong to suggest that signs saying "no through route" at Waldringfield deter walkers and thereby claim that birds are protected in those areas.

4. Uncertainties and risks (6.9)

**OBJECTION**

**Summary**

If additional greenspace is required as mitigation for the 2000 houses at Adastral Park and there is grave uncertainty that it can be delivered at Foxhall Tip (the only potential site mentioned) then this already flawed plan should not go ahead.

The Appropriate Assessment and the Sustainability Appraisal have not addressed the issues of concern that I have raised before.

**Summary:**

It is disingenuous to continue to insist that the housing policies will have "no adverse effect" on the integrity of the Deben Estuary SPA (7.4.1).

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**Attachments:**
The issues I, and others, raised in previous consultation responses are not addressed in either the Appropriate Assessment or the Sustainability Appraisal.

The data is flawed (based on a five year-old study in Dorset, an area very different in character from Suffolk); and more recent surveys (South Sandlings Survey, Deben Visitor Survey) have been ignored.

There is no detail on the “country park” proposed as a mitigation measure.

More debate is needed.

Summary:
The issues I, and others, raised in previous consultation responses are not addressed in either the Appropriate Assessment or the Sustainability Appraisal.

The data is flawed (based on a five year-old study in Dorset, an area very different in character from Suffolk); and more recent surveys (South Sandlings Survey, Deben Visitor Survey) have been ignored.

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More debate is needed.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Extra information about pressures on the SPA has been included earlier in the AA but nowhere is this given measured consideration. The old conclusions remain without any attempt to reconcile and integrate new information. (e.g., the existence of a large public car park at Waldringfield beach which generates many visitor trips. This renders the 1km argument invalid and yet it is still trotted out.) This is not only sloppy, lazy analysis of data but more importantly reveals a complete lack of seriousness on SCDC's part in continuing to safeguard the Deben estuary and listen to the concerns of those most closely concerned.

Extra information about pressures on the SPA has been included earlier in the AA but nowhere is this given measured consideration. The old conclusions remain without any attempt to reconcile and integrate new information. (e.g., the existence of a large public car park at Waldringfield beach which generates many visitor trips. This renders the 1km argument invalid and yet it is still trotted out.) This is not only sloppy, lazy analysis of data but more importantly reveals a complete lack of seriousness on SCDC's part in continuing to safeguard the Deben estuary and listen to the concerns of those most closely concerned.
I write to object to the findings of the revised AA and SA dated August 2011, and as a local taxpayer demand that the LDF is returned to cabinet for further debate.

The revised AA and SA documents still seem to be relying on out of date and misleading data. It could also be said that the authors have used statistics to get to the answer the council has always wanted.

With the strap line 'where quality of life counts' the LDF (which still reflects BT's application or put it another way is the BT application) would be laughable if it was not so sad. I cringe to think that the council feels that it's citizens quality of life will be maintained with a country park, presumably (but not stated) on the west side of the A12 at Foxhall waste site. The council is aware that there are no funds to maintain and manage such a site even if they get developer funding to start it. It is blindingly obvious that the occupants of the new housing on the east side of the A12 would have to cross said road to get to it!

Specifically the BT application, should it be given permission, will be sold to a developer who will buy on the basis of 'planning gain.' They will return to SCDC and claim that they have overpaid for site and did not recognise the level of developer funding required for mitigation projects. The development is 'cancelled' until the council allows more homes than on the original application so that a profit can be made. With council relying on this project to deliver the homes it thinks it needs it will be forced to allow more units on the site to get 'the job done.' More people means more pressure on local resources and further deterioration in the quality of life in the district.

Your faithfully
Ian Johnson

Summary:
Should BT get permission, it will be sold to a developer who will buy on the basis of 'planning gain.' They will return to SCDC claiming they have overpaid for site and did not recognise the level of developer funding required for mitigation projects. The development is 'cancelled' until the council allows more homes than on the original application so that a profit can be made. More people means more pressure on local resources and further deterioration in the quality of life.
In conclusion, WWG wishes to propose once again that the housing provision needs to be dispersed in small developments, with the inclusion of affordable homes, in villages and towns throughout the SCDC area. This would provide a more sustainable way forward for communities and for the environment.

Summary:
In conclusion, WWG wishes to propose once again that the housing provision needs to be dispersed in small developments, with the inclusion of affordable homes, in villages and towns throughout the SCDC area. This would provide a more sustainable way forward for communities and for the environment.

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Not Specified Not Specified Not Specified N/A None

Attachments:
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Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
I am writing to object to the Appropriate Assessment report, dated August 2011.

In particular I disagree with the conclusions regarding the impact on The Deben Estuary close to Martlesham and Waldringfield. It is clear that the impact will be much greater than the report suggests.

Several of the assumptions used cannot be substantiated. For instance the household size is simply a projection of past trends. There are many reasons why this figure can be challenged: particularly in light of the continuing economic downturn and fuel poverty amongst the elderly and single person households. Even this low figure has been reduced further to 1.57 by considering the district as a whole. When calculating the number of "new people" in the area close to the Deben Estuary at Waldringfield the correct figure should be 2.3 or more. Any calculations based on the low figure are therefore incorrect when applied to specific locations.

The Natural England national visitor survey states that two-thirds of visits were taken within 3.2km of the respondents home. The LDF is proposing that the number of dwellings within this distance from Waldringfield should be increased from around 360 to 2400 or more, with a consequential increase of population of about 600%. The Deben Estuary at Waldringfield and Martlesham are the only areas of public green space within 3.2km of the proposed new settlement and the resulting increase in visitor numbers would have a devastating effect.

Although the report concentrates on the effect of dog walking, there are other problems resulting from increased visitor numbers. As Waldringfield Harbourmaster, I have seen an increasing number of powered vessels launching from Waldringfield. The owners of these vessels are mainly from within 5 miles and I would expect an increase in the local population to result in much more pressure in this respect. The owners often disregard the SCDC speed limit on the river and cause noise and disturbance to birds and other wildlife and erosion to the river banks.

During the summer months I am also aware of an increasing amount of litter from picnics, discarded crabbing lines and bait (mainly bacon and raw meal). This is often left by groups of young people who arrive by cycle. It is likely that they are from the local area (east of Ipswich) and any increase of the local population will certainly exacerbate this problem.

Although it is assumed that limited car parking will impose a limit on visitor numbers, the proposed new development is within walking or cycling distance of Waldringfield and the number of visitors from this development would not be so constrained.

It is inconceivable that any of the proposed mitigation measures will have any effect on any of these problems.

In particular I disagree with the conclusions regarding the impact on The Deben Estuary close to Martlesham and Waldringfield. It is clear that the impact will be much greater than the report suggests.

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Firstly we wish to complain that the online response system is not sufficiently accessible for members of the general public. Being asked to submit responses within specific sections of two very long documents only works if stakeholders want to make specific comments at these particular points. This system discourages general comments. Splitting the document into sections also means that it is impossible to search comprehensively. In fact, the process is so complicated and time consuming it could discourage stakeholders from making any comments at all.

Also we wish to complain that the website shows 2 conflicting times for the end of the consultation - on one page it states 4.45 pm and on another it states 04.45. This has been brought to the attention of the Chief Executive of SCDC.

Consultation response

NANT OBJECTS to the findings in the revised AA and SA dated August 2011.

The issues identified in our previous consultation responses of January 2011 and subsequent letters to the council have not been addressed by the revisions in the AA and SA.

The latest version of the Appropriate Assessment demonstrates a lack of rigour when presenting "evidence" for assessing environmental risk, some examples

If it concedes that no data is available on visitor numbers to the nearby Deben Estuary and yet still goes on to draw unfounded conclusions regarding the impact on the area of 2000 houses at Martlesham. New data such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then to a great extent, ignored in the conclusions.

If it now acknowledges that there is public car parking Waldringfield it describes this as limited. No car park in the world has an infinite number of parking spaces so that statement is literally correct. However, the car park rarely reaches capacity and is capable of accommodating a significant increase in numbers of visitors.

If it further concludes that this means that as long as the houses are more than 1km from the river, the new residents will not visit the river, therefore there will be no impact on the Internationally Protected Deben Estuary

If it relies on an out of date 2006 study from Dorset to make the 1 km assumption even though later studies produced in 2008 and 2009 draw quite different conclusions as does the South Sandlings Survey

If it states that there are breaches in the sea wall and therefore people can not go for circular walks and disturb the over wintering birds and other wildlife. Yes there are breaches, but at greater distances from Waldringfield than stated in the AA. In fact these are precisely at the area best known for over-wintering birds. The Deben Estuary Survey shows that many people use Waldringfield as the starting point for riverside walks.

If some of the proposed mitigation relies on the as yet undefined green space to the north of Ipswich, and/or the conversion of the Foxhall tip to a country park, which elsewhere is highlighted as being undeliverable during the lifetime of the LDF.

If the AA concludes that because of the limited information on visitor numbers, and therefore the inability to assess the impact of the 2000 houses at Martlesham, a full visitor survey should be commissioned by others in order to determine appropriate mitigation. That makes sense - it then states that this is not necessary for the core strategy. This might apply if the LDF was a true "strategic" document. However, the authors of this Core Strategy have decided to include detailed site-specific housing allocations within the LDF, it is therefore essential, logical and fair that site-specific, deliverable mitigation is correctly determined before progressing any further.

On the basis of the significant anomalies and inaccurate information within the AA and the SA the LDF should be returned to the cabinet for further debate.

Janet Elliot
Mill Cottage
Mill Road
Waldringfield
IP12 4PY

On behalf of the 4000+ supporters of NANT

Summary: the AA concludes that because of the limited information on visitor numbers, and therefore the inability to assess the impact of the 2000 houses at Martlesham, a full visitor survey should be commissioned by others in order to determine appropriate mitigation. That makes sense - it then states that this is not necessary for the core strategy. This might apply if the LDF was a true "strategic" document. However, the authors of this Core Strategy have decided to include...
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### Attachments:
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detailed site-specific housing allocations within the LDF, it is therefore essential, logical and fair that site-specific, deliverable mitigation is correctly determined before progressing any further.
SUFFOLK COASTAL LOCAL DEVELOPMENT FRAMEWORK - CONSULTATION ON THE UPDATED SUSTAINABILITY APPRAISAL AND APPROPRIATE ASSESSMENT FOR THE REVIEWED CORE STRATEGY

The RSPB is pleased to be able to comment on the updated Sustainability Appraisal (SA) and Appropriate Assessment (AA) for the reviewed Core Strategy. Our detailed comments are provided in Appendix 1.

1. Use of appropriate baseline information to assess impacts of new development on south Suffolk Natura 2000 sites. The RSPB is pleased that the South Sandlings visitor survey report1 has been used to improve the baseline information supporting the conclusions in the updated AA. As we stated in our response to the preferred options stage (dated 18th November 2009), it is vital that any increase in the district's population must be carefully screened and monitored to ensure that there is not an adverse effect from increased visitor pressure to Natura 2000 sites. The RSPB therefore accepts that a sufficient baseline understanding of visitors to sites such as Rendlesham forest and Sutton Heath is available and that appropriate mitigation measures will be implemented where and when necessary. However, the RSPB remains concerned about the baseline information available to assess impacts to the areas estuaries, notably the Deben Estuary Special Protection Area (SPA) and Stour and Orwell Estuaries SPA. Whilst we are pleased that, particularly for the Deben Estuary SPA, it is noted that even relatively small increases in visitor numbers should not be treated as trivial there still remains the issue of a paucity of visitor data. We recognise that the 'No Adastral New Town' action group have carried out some visitor surveys on the Deben Estuary that broadly reflect the behaviour of the South Sandlings surveys. However, we expect the council to commit to work to ensure a suitable, up to date baseline for all the estuaries2 is in place prior to development taking place within the Martlesham area; something we have urged the council to do since responded to the Site Specific Allocations and Policies Issues and Options Consultation in February 2009.

2. The use of monitoring for assessing impacts on Natura 2000 sites. The Council (in combination with Ipswich Borough Council) must be able to show that development proposed for the Martlesham and Felixstowe areas will not adversely affect Natura 2000 sites: the Deben Estuary SPA and the Stour and Orwell Estuaries SPA, as well as the Sandlings SPA. Without an up to date baseline of current visitor numbers and their distribution it is not possible to assess the likely effects of future changes and conclude that the proposed Plan will have no adverse effects on Natura 2000 sites arising from recreational disturbance. Monitoring of effects after development, whilst important, cannot be considered as mitigation and used to conclude that there will not be an adverse effect on international sites, as it merely reports effects rather than preventing them.

3. Comments on the Appropriate Assessment conclusions and mitigation proposals. We generally accept the findings of the AA and the proposed mitigation measures that will be necessary to avoid adverse effects on Natura 2000 sites in the future. We are particularly supportive of the need for the provision of greenspace to encourage visitor pressure away from Natura 2000 sites. The effectiveness of this greenspace, particularly a new country park, would need to be carefully monitored and a management strategy prepared for individual sites, or for a collection of smaller sites. We would expect the greenspace to be functioning fully prior to development taking place.

4. Conclusions on the soundness of the reviewed Core Strategy. Whilst the RSPB accepts the general conclusions of the updated Appropriate Assessment, the RSPB considers that the Core Strategy remains unsound. Our comments provided in Appendix 1 reflect the inadequate consideration of biodiversity throughout the document and the need to highlight the importance of Natura 2000 sites within the district. Whilst the RSPB recognises that national guidance (for example, paragraph 5.2 of PPS123) clearly indicates that the Core Strategy should not repeat national legislation, in some circumstances it may be appropriate to provide greater clarity within a few policies by outlining policy approaches in line with legislative procedures, or reference to key policies. The RSPB therefore recommends some minor amendments to various policies (for example, Policies SP8 and SP14) that would benefit from greater reference to the Habitats Regulations4 procedures.

5. RSPB involvement with the oral examination

The RSPB wishes to attend the oral examination of the evidence-base of the Core Strategy and Development Management Policies DPD, as well as the session covering Policies SP2 (Housing Numbers) and SP14 (Biodiversity). If you have any queries on the issues discussed above, please do not hesitate to contact me. We would be happy to meet to discuss our comments in order to resolve our outstanding concerns in advance of the formal examination of the DPD.

Yours faithfully,

Philip Pearson (Dr)
Conservation Officer

RSPB Eastern England Regional Office
Annex to the RSPB response to Suffolk Coastal District Council's Reviewed Core Strategy
Appendix 1: RSPB comments on the Core Strategy and Sustainability Appraisal
Section 1.20 (p. 18)

The Habitats Regulations Assessment (HRA) recognises that there is a paucity of data to fully assess impacts to key Natura 2000 sites, such as the Deben Estuary SPA, but still concludes that there will not be a likely significant effect
from the scale of development near these sites. This is based on the assumption that people will only walk 1km or less and drive 8km or less on a regular basis. In our response to the Preferred Options document we questioned this assumption and we note that the council has not provided any evidence to support these assumptions. We consider that development at greater distances has the potential to significantly impact these sites as well.

Section 2.27 (p. 26)
The RSPB is pleased that the potential adverse effect of increased visitor pressure on the environment has been recognised. This issue could have a significant effect on Natura 2000 in the vicinity of key development areas (Martlesham and Felixstowe) and needs to be address appropriately throughout the Core Strategy and not just this one section.

Environmental Profile (pp. 29-31)
The RSPB is supportive of the Environmental Profile (EP). However, it does not consider the need for habitat creation. For example, it highlights that coastal freshwater habitats within the district will experience increased pressure from rising sea levels and coastal squeeze. These habitats support many rare species that have very limited distributions within the UK. Re-creation of freshwater habitats in more sustainable locations away from the coast is critical if species reliant on freshwater habitats are to be protected.

Strategic Policy SP1 (Sustainable Development, p. 37)
The RSPB is supportive of this policy, especially aims to (a) mitigate against and adapt to the effects of climate change, (c) achieve a local balance between employment opportunities, housing growth and environmental capacity, and (e) give priority to re-using previously developed land and buildings. Aim (j) (to conserve and enhance the best of the areas natural and built environment) should also include habitat creation.

Strategic Policy SP5 (Employment Land, p. 50)
The creation of an additional 30,000 new jobs close to Natura 2000 sites has the potential to increase visitor pressure to such sites. Careful assessment of these areas is required.

Strategic Policy SP8 (Tourism, p. 53)
The current wording of the policy fails to identify the Natura 2000 sites (notably the Deben Estuary SPA, Sandlings SPA, and Stour and Orwell Estuaries SPA) that could be impacted by increased tourism at many of the proposed development areas. These sites contain species and habitats that are highly vulnerable to disturbance from visitors, boats and other vehicles that increase noise levels and trampling. SPAs, SACs and SSSIs should be highlighted as features of importance alongside, for example, the AONB and Heritage Coast.

Section 3.133 (p. 65)
For Natura 2000 sites, it is important that the wording makes it clear that development must avoid an adverse effect in the first instance and the presumption should be that damaging development will not be permitted. Where mitigation may be acceptable, it is important that it is secured and functioning prior to development.

Strategic Policy SP14 (Biodiversity and Geodiversity, p. 67)
For Natura 2000 sites, it is important that the wording makes it clear that development must avoid an adverse effect in the first instance and the presumption should be that damaging development will not be permitted. Where mitigation may be acceptable, it is important that it is secured and functioning prior to development.

Section 3.152 (p. 69) & Development Management Policy DM21 (Design: aesthetics, pp. 128-129)
New development has the potential to reverse the declines of urban bird species such as swift, house sparrow and starling. A range of nest boxes are available that can be included in the construction of new buildings (residential and employment)

5. Development should also incorporate areas of nectar-rich plants to maintain healthy insect populations and plants that will provide seed during the winter. By providing such areas it will ensure there is a sufficient year-round food resource for birds that colonise the development. Good design principles to incorporate biodiversity into new development are contained within the Town and Country Planners Association's Ecotowns Biodiversity Worksheet 6 and Appendix 6 of the UK Green Building Council's (UK GBC) biodiversity guidance (p. 15). Table 1 was tailored for the Rackheath Ecotown development in Norfolk, but is based on the UK GBG guidance and would be suitable to be customised for development in the district:

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<td>4.14 - 4.17 (pp. 85-86)</td>
<td>This section highlights the proposed development of 2000 new homes at Adastral Park. The RSPB has already commented on the planning application for this development and remains opposed to the development due to the failure to provide sufficient mitigation to avoid adverse effects to the Deben Estuary SPA through increased recreational disturbance. We are concerned that the planning application for this development is more advanced than the strategic guidance that would govern sustainable development in the area. It is important that the international importance of the Deben Estuary is identified. It is designated as a SPA for its wintering avocet population.</td>
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<td>Strategic Policy SP20 (Eastern Ipswich Plan Area, pp. 88-89)</td>
<td>See comments on Sections 4.14 - 4.17 above.</td>
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| Strategic Policy SP21 (Felixstowe, pp. 93-94) | Development within this area could result in a likely significant effect on Trimley Marshes and the Stour and Orwell Estuaries SPA. If development in this location is to be acceptable it must be clearly shown that any potential adverse effects can be avoided. Sufficient information needs to be provided at the Core Strategy stage to justify the allocation at

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Comment

8 - Conclusions of the Appropriate Assessment

8.1: Policy SP2 and related policies

- Conclusions of the Appropriate Assessment

- Development at these specific locations could result in increased recreational disturbance to adjacent SPAs (Alde-Ore Estuary SPA, Sandlings SPA and Deben Estuary SPA). Any development must be carefully assessed to consider the likely impact of new development close to such sites to ensure that they are not adversely affected.

- Development Management Policy DM17 (Touring Caravan, Camper Vans and Camping Sites, p. 125)

- The RSPB is pleased that extensions to such sites will only be permitted if they will not have an adverse effect on protected sites and wildlife. Bullet Point (i), however, includes the phrase "materially adverse impact". We do not consider this to be in line with the Habitats Regulations terminology and recommend this be amended to "adverse impact" only.

- Development Management Policy DM27 (Biodiversity and Geodiversity, p. 133)

- The RSPB supports the presumption that damaging development will not be permitted. It is uncertain what is meant by the phrase "unacceptable impact". We recommend this phrase be replaced with "adverse effect" which has a specific meaning under the Habitats Regulations.

- Table 6.1 (Monitoring Framework, pp. 149-150)

- An additional indicator included for Objective 11 (Protecting and Enhancing the Physical Environment) should be contributions of new development to BAP targets. These should monitor the amount of habitat created and improvement of the status of key species in the district. Using the BAP targets, especially local targets, this would provide an indication of whether the Council was meeting its statutory obligations set out in the NERC Act 2006.

- RSPB comments on the Sustainability Appraisal

- Table 4.3 (Key social, environmental and economic issues in Suffolk Coastal, p.38)

- In the 'Biodiversity' section Natura 2000 sites are not mentioned. Suffolk Coastal supports five Special Protection Areas that are internationally important for the bird populations they support. These should therefore be referenced, as well as the number of Special Areas of Conservation.

Summary:

We generally accept the findings of the AA and the proposed mitigation measures that will be necessary to avoid adverse effects on Natura 2000 sites in the future. We are particularly supportive of the need for the provision of greenspace to encourage visitor pressure away from Natura 2000 sites. The effectiveness of this greenspace, particularly a new country park, would need to be carefully monitored and a management strategy prepared for individual sites, or for a collection of smaller sites. We would expect the greenspace to be functioning fully prior to development taking place.

Change to Plan

- Appear at exam?

- Legal?

- Sound?

- Duty to Cooperate?

- Soundness Tests

- Not Specified

- Not Specified

- Not Specified

- Not Specified

- None

Attachments:

- letter
I OBJECT to the findings in the revised AA and SA dated August 2011. The issues identified in my previous consultation responses have not been addressed by the revisions in the AA and SA. In addition, the AA still gives inappropriate weight to out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions. An essential piece of the so called “suite of mitigation measures” is a new country park. No site has been identified or costed - there is no evidence that this will materialise. On the basis of these revisions the LDF should be returned to the cabinet for further debate.

I OBJECT to the findings in the revised AA and SA dated August 2011. The issues identified in my previous consultation responses have not been addressed by the SA & AA revisions. In addition, the AA still gives inappropriate weight to out of date and irrelevant data. New data, such as the South Sandlings Survey and the Deben Visitor Survey have been acknowledged but then ignored in the conclusions. An essential piece of the so called “suite of mitigation measures” is a new country park. No site has been identified or costed - there is no evidence that this will materialise.
Object

8 - Conclusions of the Appropriate Assessment

8.6: Final conclusion

I object that SCDC has adopted the Core Strategy while this AA is not final (see Council Minutes 27.07.2011)

Summary:

I object that SCDC has adopted the Core Strategy while this AA is not final (see Council Minutes 27.07.2011)

Change to Plan


Not Specified Not Specified Not Specified Not Specified None

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It is difficult to see how any of the proposed mitigation measures will come about. They seem naively vague. Far less hard work seems to have gone into developing these ideas and producing realistic means by which to achieve them. It just seems like a feeble wish-list. I have no confidence in SCDC's ability (or indeed intention) to put in place the strong mitigation measures needed to counter such a massive change to the rural fringe of the AONB.
I object to the findings in the revised AA and SA dated August 2011. The issues raised in my previous consultation responses have not been dealt with by the revisions in the AA and SA.

Out of date and irrelevant data have been given inappropriate weight in the revised AA. New data (South Sandlings Survey and Deben Visitor Survey) have been acknowledged but ignored in the conclusions.

A new country park is proposed as a mitigation, but no site identified or costed, so how will it happen?

The LDF must be returned to the cabinet for further debate and significant changes.

I object to the findings in the revised AA and SA dated August 2011. The issues raised in my previous consultation responses have not been dealt with by the revisions in the AA and SA.

Out of date and irrelevant data have been given inappropriate weight in the revised AA. New data (South Sandlings Survey and Deben Visitor Survey) have been acknowledged but ignored in the conclusions.

A new country park is proposed as a mitigation, but no site identified or costed, so how will it happen?

The LDF must be returned to the cabinet for further debate and significant changes.
Appropriate Assessment for Core Strategy (August 2011)

3935 Object
8 - Conclusions of the Appropriate Assessment 8.6: Final conclusion

Respondent: Mr Jonathan Ruffle [2578]  Agent: N/A

Full Text:

8.6.1 is meaningless because of all the points mentioned at 9.1 and below.

Let's start with the AA's own assessment of the evidence base -- it is 'poor'. Data is 'sparse'. That 'the impact of existing visitors is patchily known'.

If 2000 homes are to be put on greenfield land, this isn't good enough.

The data is seven years old. In 2009 it was admitted the 2004 work was a snapshot survey during one summer and did not cover all European sites or take account of seasonal differences. At this point SCDC/NE should have put the countryside first, and paperwork second. Instead, while agreeing "it would have been desirable to have had better evidence of visitor numbers on European sites," they chose to do nothing, as "it would not be reasonable to delay the Appropriate Assessment". This was a poor conclusion. It was not reasonable considering the task in hand, and hiding behind the soundness test for the AA will not make it so.

There is acknowledgement that work not undertaken by SCDC/NE, but by local groups, is of 'excellent quality', giving 'good pointers to shared impacts'. It should stimulate SCDC/NE to further action.

The AA then says "The evidence base for the impact of visitors on bird disturbance, and on population impacts of birds, is moderately good." This is weak. If the evidence base is only moderately good, something has to be done about the evidence.

Then we read that "Natural England’s interpretation of the parts of the Stour and Orwell Estuaries with highest visitor pressure is that they are in favourable condition notwithstanding the conclusions of that disturbance report." This is the same Natural England that states four times in this AA that "Natural England has commented that it does not routinely monitor disturbance to birds on Sites of Special Scientific Interest, and recreational impacts may therefore not be included as a reason for unfavourability in condition assessments." So it would appear NE does comment when the results favour the AA, and doesn't when it doesn't. This contradiction should be addressed.

It is insulting to local people for the go-ahead for 2000 houses to be based (9.1.7) on 'the best evidence base which is available' and then go on to itemise what would 'result in a more precise assessment, particularly in respect of the impacts of additional housing provision'.

The measures form a simple list: understanding the impact of visitors; a visitor survey; detailed work to relate visitor numbers to bird use of sites, and so on.

To then say (9.2.3) "This further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress" even though 'the impact of existing visitors is patchily known' because "the mitigation...would encompass a significant proportion of this further work" is another poorly argued conclusion. If you don't know the size of the problem, how can the proposed solution be guaranteed in this way?

Summary:

The conclusion at 8.6.1 is unjustified.

It is admitted at 9.1 that the evidence base 'poor'. Data is 'sparse'. That 'the impact of existing visitors is patchily known'.

If 2000 homes are to be put on greenfield land, this isn't good enough.

Change to Plan

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This letter is the formal submission from Save Felixstowe Countryside to the above consultations, as they affect the Felixstowe peninsula, and wishes to register its objection to all aspects of the consultations. We would ask you to note our comment that your on-line submission system is time-consuming, impossible to search sufficiently to target relevant comments and designed to deter stakeholders from responding.

With regard to sustainability, Save Felixstowe Countryside is concerned at the lack of evidence to support this in the following areas:

Traffic / Mitigation

The A14 to the Orwell Bridge is running at 90% capacity now, and the Port is said to be adding another 100,000+ lorries over the next ten years. 1760 new homes on the Felixstowe peninsula will potentially add another 3000 vehicles to the local road network which is already close to gridlock.

We believe that the LDF traffic mitigation aspirations are completely unrealistic and will have, at best, only marginal impacts on the extra congestion.

Mitigation measures are virtually impossible to put in place as it is unrealistic to limit new residents to the use of public or sustainable transport. Even people who live close to their place of work may choose to go by car as this offers a higher degree of flexibility and comfort than public transport or cycling/walking.

Infrastructure / Mitigation

There is no evidence to support the LDF's aspiration that developers will provide all/any of the infrastructure necessary to sustain housing numbers on this scale, and would inevitably look to the District to provide whatever was necessary - or the community would go without, which is the more likely option.

Employment / Mitigation

Currently there is almost total reliance on the Port of Felixstowe, with local tourism and service industries being in serious decline. The London Gateway Port at Southend, whose deep-water berth facilities will be available in less than two years, will pose a serious threat to the Port of Felixstowe which itself will be looking to save money and make savings through automation and reducing staff numbers. Their quote of providing 1600 more jobs is seen as propaganda to support their 125th anniversary celebrations, and is unsubstantiated by any evidence.

For the foreseeable future the economic climate does not offer any mitigation against reliance on one employer. Small specialist companies distributed across the District are likely to be the main sources of employment, therefore a sustainable planning policy would place increased housing within reach of those areas in order to reduce the reliance on commuting.

Affordable Housing / Mitigation

Suffolk Coastal has a 1 in 3 policy of Affordable Homes provision. However, in a number of current small developments this policy has been “factored out” as developers strive to build high-end homes in affluent areas. To compensate for this, they will look to concentrate lower-end homes all together, creating a "ghetto" effect which will detract from the quality of life enjoyed by people in the locality at present.

It is acknowledged within the Core Strategy that the future role of foreign economic migrants is not considered within the Plan. Therefore, to restrict Affordable Housing will be to exclude the inevitable influx of members of this group, while a large supply of executive higher-end homes will ensure the continuing influx of people of/nearing retirement age which the LDF does not consider a “sustainable” group.

Environment / Mitigation

Inevitable increases in traffic on the A.14 and local road network will increase air pollution on a peninsula already suffering light and noise pollution from a busy Port. This will have an unavoidable adverse effect on ALL residents which in our view does not support the planning policy as being sustainable.

Landscape / Mitigation

The visual landscape will be destroyed in many parts of the Felixstowe peninsula, and while no-one is entitled to a "view", taking away a visual amenity is known to have an adverse effect on morale and social behaviour within the local community.
We also do not agree that sustainable development will respect the character of settlements and landscape, as the character of our rural landscape will be completely destroyed by any housing development.

Flooding / Mitigation

The David Lock report identified brownfield land within the peninsula which could accommodate hundreds of homes without any need to touch greenfield land. These sites were subsequently excluded on grounds that they were subject to flooding.

However, the Environment Agency allows development in flood risk areas where the benefits of development outweigh the risks, as long as these developments include mitigation measures to minimise the risk.

Â£10 million is currently being spent on new sea defences which are said to be necessary to protect "1000 homes and businesses for the next 100 years".

These defences would therefore provide the mitigation that would allow brownfield sites previously excluded to be brought back into the equation and preserve greenfield land for agricultural use, which was stated by Suffolk Coastal as one of its priorities following the Orwell Hotel meeting in August 2008.

Appropriate Assessment

The Rt Hon David Cameron, when he wrote to the National Trust, assured us that "sustainable development means maintaining a balance between economic, environmental and social concerns". However, we have seen no evidence of this being taken into account by Suffolk Coastal District Council when putting together its Core Strategy, which we continue to reject as being not economically viable, not environmentally friendly and undertaken without the support of the community.

Your own statements confirming that the above factors were considered during plan preparation would indicate that a thorough and independent examination of the plan and its implications had been undertaken. It is therefore a surprise to find that the main contributors are either employed by, or attached to, Suffolk County Council. As the County Council would itself benefit from new development on this scale, it is questionable whether the appraisal has been independently audited for sustainability and soundness.

General

In summary, Save Felixstowe Countryside rejects the Sustainability Appraisal and Appropriate Assessment consultations in their entirety. We also re-state our objection to the scale of new homes proposed for the Felixstowe peninsula and the proposal to build on greenfield land.

The District Council has now been relieved of its obligation to provide a statutory number of homes, and has been told by its own government to make its decisions in the best interests of the local area. It is our view that what is proposed for Felixstowe is not in the Town's best interests.

Summary: Your own statements confirming that the statement "sustainable development means maintaining a balance between economic, environmental and social concerns", were considered during plan preparation would indicate that a thorough and independent examination of the plan and its implications had been undertaken. It is therefore a surprise to find that the main contributors are either employed by, or attached to, Suffolk County Council. As the County Council would itself benefit from new development on this scale, it is questionable whether the appraisal has been independently audited for sustainability and soundness.

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**Appropriate Assessment for Core Strategy (August 2011)**

**4085**

**Comment**

8 - Conclusions of the Appropriate Assessment

8.6: Final conclusion

**Respondent:** Waldringfield Parish Council (Mrs Jean Potter)  
**Agent:** N/A

**Full Text:**

Á§5 Methods of assessing European site visitor increases from an increased human population

Point 1, Summary:

There is no up to date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites of concern to the Appropriate Assessment. Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"There is a limited amount of data regarding the quantity of visitors to European sites" (Á§5.1.10) Despite this lack of data, important and wide-ranging conclusions are drawn about visitor numbers and the impact of the proposed housing on these sites. This is little more than guesswork. A proper scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife.

"A survey within the Suffolk Coast and Heaths AONB in 2004 provides the best data currently available, and can be used to predict increases in visitor numbers from new housing." (Á§5.1.10). This survey covers the AONB as a whole. It makes no mention of the Deben Estuary SPA/SSSI/RAMSAR Site. Neither does it mention the other SSSIs near to Adastral Park (Newbourne Springs, Ipswich Heaths and Sinkys Valley, Kesgrave), because they are not in the AONB. The only interview locations on the River Deben are at Melton and Bawdsey, which are irrelevant to the proposed housing at Adastral Park and Felixstowe. All the interviews were conducted in August, none in spring, autumn or winter. These facts make the AONB 2004 survey completely irrelevant to any prediction of increases in visitor numbers from new housing. In particular, the phrase "can be used to predict increases in visitor numbers from new housing" refers to visitors to the European Sites potentially affected, as listed in Á§2.1.2. In Á§2 (European sites potentially affected) it makes no mention of the AONB.

Throughout Á§5.3 (Calculations to predict additional visitors to European sites across the Suffolk Coast and Heaths AONB using Tourist Board data) the distinction between the AONB and the European Sites is regularly confused. For example:

- in Á§5.3.5 it says: "Many of the sites in the AONB involved in the visitor study were European sites, so the study is relevant to this Appropriate Assessment." The AONB (2004) study makes no mention of (and certainly does not involve) any environmentally designated sites, European or otherwise.

- In Á§5.3.21 it says: "... roughly one-quarter of all visits to the AONB originate from Ipswich Borough and Suffolk Coastal District. This assumption is also applied to the European sites within the AONB." On what basis is this assumption also applied to European sites within the AONB?

- In Á§5.3.18 it says: "Table 6 shows that the increase in visitors to the Suffolk Coast and Heaths AONB, as a result of the proposed developments is predicted to be 2.83%." In Á§5.3.25 it says: "To allow for these assumptions, the approximate 2.83% increase in total visitors to the AONB is given as a range of 2% - 5%." (our emphasis). Both of these refer to the AONB, not any European Site or Sites. But then in Á§5.3.26 it says: "it would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% ..." No justification is given for jumping from a conclusion about visitors to the AONB to one about visitors to European Sites.

Not only is there a confusion between the AONB and European Sites within the AONB, but no attempt is made in Á§5.3 to distinguish between individual European Sites. For example, the Deben Estuary SPA is obviously more likely to receive a greater increase in visitors due the proposed housing at Adastral Park than more northerly sites such as the Minsmere-Walberswick SPA, but this is not mentioned. (The discussion of the South Sandlings Survey in Á§5.5 rectifies this for the European Sites within the survey area, but of course this does not cover the Deben Estuary, and it does not clarify the confusions in Á§5.3.)

Point 2, Summary:

The estimate of the net increase in people for the East Ipswich Plan Area, based as it is on 1.57 new people per dwelling, is a serious under-estimate. The figure of 1.57 comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. It contains the absurd hidden assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding. There is no evidence that there is any overcrowding in these villages. In Á§5.3.7 to Á§5.3.13, and particularly in Table 3, an attempt is made to estimate the increase in population due to the proposed housing. To do this it uses the 'number of new people per new dwelling', which in Suffolk Coastal is supposed to be 1.57. This is more realistic than the previous figure of 0.9, but is still seriously flawed. It comes from the Oxford Economics Study, which SCDC rejected, and it has never been explained how this value was arrived at. According to the Oxford Economics Study the occupancy rate in the East was 2.31 (in 2009) decreasing to 2.22 (in 2027), giving an average of 2.27. (p34)

In Á§5.3.9 the figure of 1.57 is explained: "This is not an assumption about the occupancy rate of new dwellings, as some multiple person households already living in the area will fragment and disperse into the new dwellings, or some dwellings (existing or new) may be bought as holiday homes with zero occupancy." It is extremely unlikely that any of the 2,000 dwellings proposed for Adastral Park will be bought for holiday homes, so the difference between the 4,540 (2,000x2.27) new occupants and the 3,140 (2,000x1.57) new people to the area must be accounted for by assuming that 1,400 (4,540-3,140) people will move to Adastral Park because of the fragmentation of multiple person households in the area, and so will not be adding to the number of extra people living near the Deben Estuary. This dubious assumption is not explained or even mentioned, let alone properly justified. It is in fact totally implausible. In order for an occupant of the new housing at Adastral Park not to count as a 'new' additional person, he/she must:

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1. move to Adastral Park from somewhere at least equally near the Deben Estuary (approximately)
2. move out of a multiple person household into one with the same or lower occupancy at Adastral Park
3. not be replaced by anyone moving into the area from further afield
4. not be part of a house-moving chain involving anyone moving into the area from further afield

The only places that qualify for inclusion in (1) are: Waldringfield, Newbourne, Henley, Brightwell, Martlesham Village and Martlesham Heath (just). Kesgrave and Grange Farm are roughly twice the distance from the Deben Estuary so can be excluded, and Woodbridge can be excluded because although it is on the River Deben, it is not on a sensitive part: “the Deben Estuary is not assessed by Natural England as being unfavourable due to human disturbance” (Å§6.2.35). The combined populations of these 6 villages is 6,630; so the Appropriate Assessment contains the absurd hidden assumption that 1,400 (21%) of the residents of these villages will move to Adastral Park because of pressures of overcrowding. There is no evidence that there is any overcrowding in these areas, or that there is any desire for the residents to move to the proposed housing at Adastral Park - the idea is quite ludicrous. The upshot of this is that the figure of 3,462 for the ‘Estimated net increase in people’ for the East Ipswich Plan Area, (Table 3), based as it is on 1.57 new people per dwelling, is a serious under-estimate. It is far more likely that the entire population of the 2,000 new houses at Adastral Park will come from outside the immediate area, and will be about 4,540 (2,000 x 2.27).

The same criticism can be applied to the Felixstowe, Walton and the Trimleys figure of 2,763 (Table 3).

Point 3, Summary:
The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing the upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.

The actual increase in the number of people visiting the sites is not given, because the current number of visitors is unknown (because of the lack of a proper survey - see above).

The assumptions given in Å§5.3.14 are all highly dubious (except one):
- “the pattern of day visits to sites by the new residents is similar to that of the existing population” This is very unlikely.
- The proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries.
- “the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey” It is not clear if ‘sites’ is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.
- “an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity” OK, this is an acceptable assumption.
- “the relative proportions of day visitors and overnight visitors does not change” Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase.
- “the summer snapshot survey is typical of visitors all year round.” This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to - be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

Table 4 (Å§5.3.13), second column reads ‘Estimated increase in people (table 2)’. The data is actually taken from Table 3.

Table 5 (Å§5.3.16), second column reads ‘proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1’. The data is actually taken from Table 2.

The calculations in Table 5 and described in Å§5.3.15 are an attempt to predict the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as stated in the title of Table 6. However, in several places the restriction (in bold above) is not made clear, for example in Å§5.3.14-16. This gives the impression that it predicts the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from all potential sources. 50.5% of the total day visitors to the AONB come from outside Suffolk Coastal and Ipswich Borough/Pinewood. Increases in the populations in the areas these people come from have been excluded from the calculations. This is unrealistic - Babergh, Tendring, Waveney and all the other nearby districts all have LDF Core Strategies that propose large housing allocations and correspondingly large increases in populations.

The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as described in Å§5.3.15 and shown in Table 5, is logically flawed. Column A only includes day visitors who live in Suffolk Coastal and Ipswich Borough/Pinewood. In Column B this is multiplied by the proportion of visitors who are day visitors (55%). However, the figure of 55% applies to visitors from all locations, not just those from Suffolk Coastal and Ipswich Borough/Pinewood. Common sense tells us that local visitors are more likely to be on day trips than those coming from further afield, and this is confirmed by comparing Map3 (p11) with Map 4 (p12) in the Suffolk Coast and Heaths AONB Survey (2004). It is therefore reasonable to assume that a far larger value than 55% should be used as the multiplier in Column B (the data shown in the Suffolk Coast and Heaths AONB Survey (2004) isn’t sufficiently detailed to tell us what the value should be.) In fact it would be much more realistic to have different multipliers for the different areas - for example we know that about 95% of visitors to Martlesham are on day trips (Suffolk Coast and Heaths AONB Survey (2004) Chart 3), so if most of these came from
the East Ipswich Plan Area we could use 95% as the multiplier in Column B, 2nd row.

Two of the three assumptions given in Â§5.3.23 are highly dubious:

* "New' people in the Borough / District will have the same visiting pattern as 'existing' people" This is very unlikely - see comments on Â§5.3.14, first bullet point

* Visits by holiday makers will not be affected by any increased use by local visitors" It is possible that overcrowding at popular sites will put off holidaymakers. Holiday makers generally want to visit unspoiled countryside; the urbanisation resulting from the housing allocations, particularly at Adastral Park, is very likely to deter holidaymakers.

* "Sites, including their car parks, will not constrain the number of visits by becoming 'full' and turning away visitors" OK, this is an acceptable assumption.

The uncertainties in the calculations are acknowledged by the vagueness of the conclusion (Â§5.3.26): "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% as a result ... " It would also be reasonable to assume that the increase is far higher than 5%. What justification is there for choosing 5% as the upper limit rather than, say, 10%? The flaws in the methodology, the likelihood that the assumptions in Â§5.3.14 and Â§5.3.23 are invalid, and the inappropriateness of using the Suffolk Coast and Heaths AONB Survey (2004) results in the first place all combine to make this conclusion completely worthless.

Point 4, Summary:
The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the proposed new housing in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area than the average across the AONB. One would expect therefore receive a far greater increase in visitors than the average across the whole of the AONB. Even if the figure of 2-5% is correct it tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs to be far greater than the 8.8% estimated for the South Sandlings area. Nowhere is this obvious conclusion stated.

Another reason the figure of 2-5% is worthless is that it is an average across the whole of the AONB. 77% of the proposed new housing is in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area, all of which are far closer to the Orwell and Deben Estuaries than the other European Sites in the AONB, and these sites will therefore receive a far greater increase in visitors than the average across the whole of the AONB. Even if the figure of 2-5% is correct it tells us nothing about the increase in visitors from any particular distance band. For example, if the number of houses doubled in a particular distance band the number of visitors from that area would also double" (Â§5.6). We agree with this. It is a pity that this logic can't also be applied to the impact on the Deben Estuary of the 2,000 houses proposed for Adastral Park. The calculation method described in Â§5.5.9 and Â§5.10 seems to be far more realistic than those used in Â§5.3 (criticised above), and there seems to be no good reason why it couldn't also be applied the Adastral Park - Deben Estuary situation if basic data on visitor numbers were known.

"The distribution of proposed housing is not precisely specified within the Core Strategies." (Â§5.5.7) This is not entirely true. One of our main complaints about the SCDC LDF Core Strategy is that it is very site-specific. 2,000 houses 'to the south and east of Adastral Park' could hardly be more site-specific.

In Â§5.5.12 the increase in the number of visitors to the South Sandlings area as a result of the Ipswich and Suffolk Coastal Core Strategies is predicted to be 8.8% (broadened to 6-12% in Â§5.5.14). Most of the housing proposed in these Core Strategies is far nearer to the Deben Estuary than it is to the South Sandlings area, so one would expect the increase in the number of visitors to the former to be far greater than 8.8%. Nowhere is this obvious conclusion stated.

(No estimate is given for the increase in the number of visitors to the Deben Estuary as a result of the Ipswich and Suffolk Coastal Core Strategies, which is a pity as this is the SPA most affected by the extra housing.)

Point 5, Summary:
The claim that people are unlikely to walk further than 1km is absurd. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.

Throughout Â§5.6 various references are made to the ridiculous claims that people are unlikely to walk further than 1km or drive further than 8km. For example: "...only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur..." (Â§6.6.6). These are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed. The 1km figure is invalid because:

1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked less than 1km was that they lived less than 1km from the site, so didn't need to walk further.
3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. The inappropriateness of the 1km figure is borne out by the Deben Estuary Survey, which shows that 57.1% (far more than the 11% in Dorset) of visitors to the River Deben who arrived on foot walked more than 1km (Deben Estuary Survey, Å6.2.19). The average distance travelled by people on foot (3.8km) easily puts the Deben Estuary SPA within the orbit of the proposed LDF Core Strategy site at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption.

“The allocation east of Ipswich around Martlesham could be close to the Deben Estuary SPA” (Å6.6.7). The allocation east of Ipswich around Martlesham is close to the Deben Estuary SPA - it is 1.8km away (as the crow flies). The use of the term ‘could be’ is disingenuous - it implies there is some leeway in where the housing goes, which isn’t the case. The LDF Core Strategy specifies ‘To the south and east of Adastral Park’ which can only mean one thing - BT’s land (see BT’s planning application C09/0555).

“The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings” (Å6.8.5). Whilst this is factually correct, its significance is questionable, as the Deben Estuary Survey did not cover the winter period, it simply asked interviewees if they also visited in the winter.

“The Deben Estuary visitor survey ... does not have the data or analysis to predict changes in visitor numbers” (Å6.5.8.8). This is partly true, a more comprehensive survey carried out by professionals would be needed for that. The survey says: “We hope that the data we have collected is helpful in providing some baseline information from which further studies can be conducted or more realistic projections made regarding increased visitor numbers resulting from the Adastral Park, Martlesham development and the consequent impact on the wildlife.” (Deben Estuary visitor survey, Å1.9). The point is that the Appropriate Assessment makes predictions of increases to visitor numbers without any data on current visitor numbers, so although the Deben Estuary visitor survey isn’t scientifically rigorous, it is better than nothing.

Å6.2 Policy SP2. Housing numbers

Point 6. Summary: The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The conclusion that it is unlikely that many visitors would walk from their homes to the Deben Estuary SPA at Martlesham, and that it is expected there will be no new high levels of disturbance, are based on the flawed assumption that people won't walk more than 1km and an unrealistic reliance on greenspace provision. “... the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk”. There is nothing wrong with the estuary-side path, it is perfectly walkable for about 2.5km up to the breach opposite Methersgate Quay. We agree with most of Å6.2.28, although the location of the proposed housing is known precisely - it is ‘To the south and east of Adastral Park’ see comments on Å5.6.7. above.

We agree with the conclusion in Å6.2.30: “It therefore cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA near Martlesham”. However, this is then contradicted in Å6.2.31: “Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the greenspace provision is adequate, it is unlikely that many visitors would walk from their home to the estuary, so this recreational activity would not substantially increase on the foreshore of Deben Estuary SPA at Martlesham, and there is expected to be no new high levels of disturbance ...”. The assumption that people won’t walk more than 1km is invalid (see our comments on Å6.5 above), and the reliance on greenspace provision is equally flawed (even if the greenspace appears in time, which is doubtful) - see our comments on Å6.7. below. The Deben Estuary Survey showed that 32% of visitors on foot walked more than 3km to the Deben Estuary at Martlesham (Deben Estuary Survey, Å6.2.19).

“it is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2 - 2.5km from the Martlesham church car park (The Deben Estuary Visitor Survey by NANT of July 2011 gives 2.5km).” (Å6.2.34) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 1.6km and 3.0km respectively (Deben Estuary Survey, Å3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.2km.

Point 7. Summary: The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren’t necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as ‘lost due to erosion’ is grossly misleading. These paths are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

“This limit to parking suggests that there is limited availability for an increase in visitors arriving by car to Waldringfield.”... "Given the limit to available parking the increase in visitors walking along the estuary might be less than that predicted.” (Å6.2.35) Obviously the parking space is ‘limited’, i.e. it isn’t ‘infinite’. In fact there is space for about 75 cars in the public parking area and about 22 in the patrons only area. However, too much emphasis has been placed on the "limit to available parking" - this only applies at peak times, most of the year there is plenty of space. A letter to the Chair of Waldringfield PC from the manager of the Maybush, dated 16/2/10 says: “... the car park, generally, is not at capacity at any other time than school holidays, bank holidays and weekends; it is however often at capacity during these times out of our hours i.e. before 11am if the weather is fine and/or there is an event on at the sailing club.” When the car park is full visitors aren’t necessarily deterred - it is common for visitors to park in Cliff Road, and recently in Church Field Car Park, causing extra congestion (Cliff Road is narrow and single lane in places).

"It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2.5 - 3km from the Deben Estuary..."
estuary at Waldringfield (The Deben Estuary Visitor Survey by NANT of July 2011 gives 3km).” (§6.2.35) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 2.0km and 2.5km respectively (Deben Estuary Survey, §3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.1km.

“Estuary-side footpaths north and south of Waldringfield are eroded and impassable, according to data received from Suffolk County Council in August 2011 (see Figure 03). This limits the walking routes available from Waldringfield.” (§6.2.36). Figure 03 shows the footpath extending about 1km north of Manor House and about 1.5km south of the reservoir as ‘Section lost due to erosion’. This is completely untrue and is grossly misleading. In fact the path north of Waldringfield is breached opposite Methersgate Quay about 2/3 of the way along the section shown as ‘lost’, and the path south of Waldringfield is breached just beyond Early Creek, at the southern end the section shown as ‘lost’. In places these paths can get muddy in poor weather, but otherwise are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

Point 8, Summary:
The conclusion that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA is based on the invalid assumption that people won’t walk more than 1km, and the unrealistic reliance on greenspace provision.

“It can be ascertained that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA, given a location well over 1km from the estuary and with adequate greenspace provision.” (§6.2.42). This is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on §5.6), and the unrealistic reliance on greenspace provision - see our comments on §7.

Point 9, Summary:
No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment

No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is important because: “On one estuarine site, disturbance to birds from boats was thought to be the biggest problem” (§5.7.6). Motor boats and jet skis, which create a large wake, also contribute to erosion of the river banks, endangering the delicate saltmarsh ecosystem. This is a serious omission from the Appropriate Assessment.

§7 Mitigation

Point 10, Summary:
The Appropriate Assessment places great reliance on the creation of a new country park as mitigation. This is despite the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Even if a site is found it will not have any of the attractive features of the Deben Estuary, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

The Appropriate Assessment places great reliance on the creation of a new country park, which it claims will provide mitigation by diverting visitors (and particularly dog walkers) away from the Deben Estuary. No specific site is suggested, although a location vaguely described as “to the north or north-east of Ipswich” is proposed (§7.2.10). However, no mention is made of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

Various wish-lists of desirable features of this mitigating greenspace are presented throughout §7.2. However, the ones that could actually attract visitors away from the Deben Estuary are conspicuous by their absence. Most people who visit the Deben Estuary do so because of the river. They walk along its banks, their children play on the beach and swim in the river, they sail, fish, birdwatch and engage in many other river-based activities, and of course the Maybush at Waldringfield attracts people from far and wide. A country park will not have any of these attractive features, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

There isn’t an abundance of suitable sites “to the north or north-east of Ipswich’. The phrase “to the north or north-east of Ipswich” suggests that it is likely that the site will be west of the A12, and if this is the case then the Deben Estuary will be far more accessible to the residents of the proposed Adastral Park development than the mitigation site, as the A12 presents a significant barrier to walkers.

Following the dubious logic of the Appropriate Assessment, if the mitigating greenspace is more than 1km from the development, visitors are unlikely to walk there. A circle of radius 1km from Adastral Park barely reaches beyond Martlesham Heath to the west or Tesco’s car park to the north, an area that contains no significant candidate spaces, so it is difficult to see where this greenspace could come from. Unless, that is, people are expected to drive to the mitigation site, in which case it won’t have any effect on visitors going to the Deben Estuary on foot, but will increase traffic congestion west of the A12.

Recent evidence from Dorset casts serious doubt on the effectiveness of alternative greenspace in mitigating against increases in visitors to environmentally sensitive sites: “Almost all responding households had some ‘Other’ greenspace within 1.5km. The presence of this ‘Other’ greenspace had no apparent effect on reducing either the likelihood or frequency of visiting heaths... Some of the results suggest that people with more greenspace surrounding their homes may actually visit heaths more... The most critical conclusion is that there appears to be only a slender relationship between the amount of (existing) alternative greenspace nearby and the amount of heathland visits” (East Dorset District Council Public Report - Household Survey, Footprint Ecology, May 2009, p27).

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No change has been made to the conclusions on mitigation (§7.4): "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This of course depends on the mitigation being implemented and available at the start of house building. However, even if it is, it is highly unlikely that "the impacts of additional housing provisions in Policy SP2 and related policies ... will be reduced to an insignificant level" (§7.4.1). Where is the evidence that this (as yet hypothetical) mitigation will reduce the 'adverse effect' to an 'insignificant level'? The current number of visitors to the European sites isn't even known, and the increase isn't known either, so how can it be said with confidence that this increase will be eradicated with appropriate mitigation? It is pure speculation, without any basis in fact.

§8 Conclusions

Point 11, Summary:
Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

"It is concluded that policy SP2 would have an adverse effect upon the integrity of a number of European sites, alone and in combination with the Ipswich Borough Core Strategy and Policies." (§8.6.1). This we do agree with. "Mitigation is proposed which, if implemented, would reduce the adverse effect to an insignificant level and would enable a conclusion that it can be ascertained that there will be no adverse effect upon the integrity of any European site." (§8.6.1). As explained above, given that no sites or funding have been found, mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. We believe there is no justification for this optimism, and that it is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

§9.2 Further work needed

Point 12, Summary:
It is claimed that further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. Yet it is acknowledged that the data upon which major decisions have been based is poor. No attempt will be made to get better data before the decisions are formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment’s conclusions. This is not how decision making is supposed to work.

"Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected." (§9.1.1). This decision was made in 2009. If SCDC had instead decided to commission a proper visitor survey at that time, it would probably be complete by now (2 years later), and could have provided a far more reliable basis for assessing the impact of the housing proposed in the Ipswich Borough and Suffolk Coastal Core Strategies.

Having acknowledged that the data is poor, the Appropriate Assessment makes the highly dubious claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." (§9.2.3) So a major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment’s conclusions.

Summary: Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

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Attachments:
Full letter

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SUFFOLK COASTAL LOCAL DEVELOPMENT FRAMEWORK - CONSULTATION ON THE UPDATED SUSTAINABILITY APPRAISAL AND APPROPRIATE ASSESSMENT FOR THE REVIEWED CORE STRATEGY

The RSPB is pleased to be able to comment on the updated Sustainability Appraisal (SA) and Appropriate Assessment (AA) for the reviewed Core Strategy. Our detailed comments are provided in Appendix 1. In our response to the Revised Core Strategy and Sustainability Appraisal Consultation in February 2009, the RSPB highlighted the fact that the Core Strategy provides an insufficient steer on the protection and enhancement of biodiversity (including habitat creation). No changes to the previous submission draft of the Core Strategy appear to have been made to address this issue. Our previous comments on the document therefore remain largely applicable, although we have made some amendments in light of the additional information provided in the updated AA.

1. Use of appropriate baseline information to assess impacts of new development on south Suffolk Natura 2000 sites. The RSPB is pleased that the South Sandlings visitor survey report has been used to improve the baseline information supporting the conclusions in the updated AA. As we stated in our response to the preferred options stage (dated 18th November 2009), it is vital that any increase in the district's population must be carefully screened and monitored to ensure that there is not an adverse effect from increased visitor pressure to Natura 2000 sites. We therefore accept that a sufficient baseline understanding of visitors to sites such as Rendlesham forest and Sutton Heath is available and that appropriate mitigation measures will be implemented where and when necessary. However, the RSPB remains concerned about the baseline information available to assess impacts to the areas estuaries, notably the Deben Estuary Special Protection Area (SPA) and Stour and Orwell Estuaries SPA. Whilst we are pleased that, particularly for the Deben Estuary SPA, it is noted that even relatively small increases in visitor numbers should not be treated as trivial there still remains the issue of a paucity of visitor data. We recognise that the 'No Adastral New Town' action group have carried out some visitor surveys on the Deben Estuary that broadly reflect the behaviour of the South Sandlings surveys. However, we expect the council to commit to work to ensure a suitable, up to date baseline for all the estuaries is in place prior to development taking place within the Martlesham area; something we have urged the council to do since responded to the Site Specific Allocations and Policies Issues and Options Consultation in February 2009.

2. The use of monitoring for assessing impacts on Natura 2000 sites. The Council (in-combination with Ipswich Borough Council) must be able to show that development proposed for the Martlesham and Felixstowe areas will not adversely affect Natura 2000 sites: the Deben Estuary SPA and the Stour and Orwell Estuaries SPA, as well as the Sandlings SPA. Without an up to date baseline of current visitor numbers and their distribution it is not possible to assess the likely effects of future changes and conclude that the proposed Plan will have no adverse effects on Natura 2000 sites arising from recreational disturbance. Monitoring of effects after development, whilst important, cannot be considered as mitigation and used to conclude that there will not be an adverse effect on international sites, as it merely reports effects rather than preventing them.

3. Comments on the Appropriate Assessment conclusions and mitigation proposals. We generally accept the findings of the AA and the proposed mitigation measures that will be necessary to avoid adverse effects on Natura 2000 sites in the future. We are particularly supportive of the need for the provision of greenspace to encourage visitor pressure away from Natura 2000 sites. The effectiveness of this greenspace, particularly a new country park, would need to be carefully monitored and a management strategy prepared for individual sites, or for a collection of smaller sites. We would expect the greenspace to be functioning fully prior to development taking place.

4. Conclusions on the soundness of the reviewed Core Strategy. Whilst the RSPB accepts the general conclusions of the updated Appropriate Assessment, the RSPB considers that the Core Strategy remains unsound. Our comments provided in Appendix 1 reflect the inadequate consideration of biodiversity throughout the document and the need to highlight the importance of Natura 2000 sites within the district. Whilst the RSPB recognises that national guidance (for example, paragraph 5.2 of PPS123) clearly indicates that the Core Strategy should not repeat national legislation, in some circumstances it may be appropriate to provide greater clarity within a few policies by outlining policy approaches in line with legislative procedures, or reference to key policies. The RSPB therefore recommends some minor amendments to various policies (for example, Policies SP8 and SP14) that would benefit from greater reference to the Habitats Regulations.

5. RSPB involvement with the oral examination

The RSPB wishes to attend the oral examination of the evidence-base of the Core Strategy and Development Policies DPD, as well as the session covering Policies SP2 (Housing Numbers) and SP14 (Biodiversity). If you have any queries on the issues discussed above, please do not hesitate to contact me. We would be happy to meet to discuss our comments in order to resolve our outstanding concerns in advance of the formal examination of the DPD.

Yours faithfully,
Philip Pearson (Dr)
Conservation Officer

RSPB Eastern England Regional Office
Annex to the RSPB response to Suffolk Coastal District Council's Reviewed Core Strategy
Appendix 1: RSPB comments on the Core Strategy and Sustainability Appraisal
Section 1.20 (p. 18)

The Habitats Regulations Assessment (HRA) recognises that there is a paucity of data to fully assess impacts to key Natura 2000 sites, such as the Deben Estuary SPA, but still concludes that there will not be a likely significant effect
from the scale of development near these sites. This is based on the assumption that people will only walk 1km or less and drive 8km or less on a regular basis. In our response to the Preferred Options document we questioned this assumption and we note that the council has not provided any evidence to support these assumptions. We consider that development at greater distances has the potential to significantly impact these sites as well.

Section 2.27 (p. 28)

The RSPB is pleased that the potential adverse effect of increased visitor pressure on the environment has been recognised. This issue could have a significant effect on Natura 2000 in the vicinity of key development areas (Martlesham and Felixstowe) and needs to be address appropriately throughout the Core Strategy and not just this one section.

Environmental Profile (pp. 29-31)
The RSPB is supportive of the Environmental Profile (EP), However, it does not consider the need for habitat creation. For example, it highlights that coastal freshwater habitats within the district will experience increased pressure from rising sea levels and coastal squeeze. These habitats support many rare species that have very limited distributions within the UK. Re-creation of freshwater habitats in more sustainable locations away from the coast is critical if species reliant on freshwater habitats are to be protected.

Strategic Policy SP1 (Sustainable Development, p. 37)
The RSPB is supportive of this policy, especially aims to (a) mitigate against and adapt to the effects of climate change, (c) achieve a local balance between employment opportunities, housing growth and environmental capacity, and (e) give priority to re-using previously developed land and buildings. Aim (j) (to conserve and enhance the best of the areas natural and built environment) should also include habitat creation.

Strategic Policy SP5 (Employment Land, p. 50)
The creation of an additional 30,000 new jobs close to Natura 2000 sites has the potential to increase visitor pressure to such sites. Careful assessment of these areas is required.

Strategic Policy SP8 (Tourism, p. 53)
The current wording of the policy fails to identify the Natura 2000 sites (notably the Deben Estuary SPA, Sandlings SPA, and Stour and Orwell Estuaries SPA) that could be impacted by increased tourism at many of the proposed development areas. These sites contain species and habitats that are highly vulnerable to disturbance from visitors, boats and other vehicles that increase noise levels and trampling. SPAs, SACs and SSSIs should be highlighted as features of importance alongside, for example, the AONB and Heritage Coast.

Section 3.133 (p. 65)
For Natura 2000 sites, it is important that the wording makes it clear that development must avoid an adverse effect in the first instance and the presumption should be that damaging development will not be permitted.

Where mitigation may be acceptable, it is important that it is secured and functioning prior to development.

Strategic Policy SP14 (Biodiversity and Geodiversity, p. 67)
For Natura 2000 sites, it is important that the wording makes it clear that development must avoid an adverse effect in the first instance and the presumption should be that damaging development will not be permitted.

Section 3.152 (p. 69) & Development Management Policy DM21 (Design: aesthetics, pp. 128-129)
New development has the potential to reverse the declines of urban bird species such as swift, house sparrow and starling. A range of nest boxes are available that can be included in the construction of new buildings (residential and employment)

5. Development should also incorporate areas of nectar-rich plants to maintain healthy insect populations and plants that will provide seed during the winter. By providing such areas it will ensure there is a sufficient year-round food resource for birds that colonise the development. Good design principles to incorporate biodiversity into new development are contained within the Town and Country Planners Association's Ecotowns Biodiversity Worksheet 6 and Appendix 6 of the UK Green Building Council's (UK GBC) biodiversity guidance (p. 15)? Table 1 was tailored for the Raekheath Ecotown development in Norfolk, but is based on the UK GBG guidance and would be suitable to be customised for development in the district:

Table 1: Providing nesting and roosting opportunities in new buildings 8 Species Standards Crevise dwelling bats 1 box in 20 structures Bats requiring flight space Access provided in five public buildings (non-residential) Swifts 5-10 swift bricks per dwelling House martins 2-3 artificial nests on 1 in 50 buildings House sparrows 2-3 boxes/bricks on 1 in 40 buildings Starlings 1 box in 100 buildings

Sections 4.14 - 4.17 (pp. 85-86)
This section highlights the proposed development of 2000 new homes at Adastral Park. The RSPB has already commented on the planning application for this development and remains opposed to the development due to the failure to provide sufficient mitigation to avoid adverse effects to the Deben Estuary SPA through increased recreational disturbance. We are concerned that the planning application for this development is more advanced than the strategic guidance that would govern sustainable development in the area.

It is important that the international importance of the Deben Estuary is identified. It is designated as a SPA for its wintering avocet population.

Strategic Policy SP20 (Eastern Ipswich Plan Area, pp. 88-89)
See comments on Sections 4.14 - 4.17 above.

Strategic Policy SP21 (Felixstowe, pp. 93-94)
Development within this area could result in a likely significant effect on Trimley Marshes and the Stour and Orwell Estuaries SPA. If development in this location is to be acceptable it must be clearly shown that any potential adverse effects can be avoided. Sufficient information needs to be provided at the Core Strategy stage to justify the allocation at
Appropriate Assessment for Core Strategy (August 2011)

4357 Comment

8 - Conclusions of the Appropriate Assessment  8.6: Final conclusion

a strategic level.
Strategic Policies SP22 (Aldeburgh, pp. 96-97), SP24 (Leiston, pp. 98-99), SP26 (Woodbridge, pp. 101-102)
Development at these specific locations could result in increased recreational disturbance to adjacent SPAs (Alde-Ore
Estuary SPA, Sandlings SPA and Deben Estuary SPA). Any development must be carefully assessed to consider the
likely impact of new development close to such sites to ensure that they are not adversely affected.
Development Management Policy DM17 (Touring Caravan, Camper Vans and Camping Sites, p. 125)
The RSPB is pleased that extensions to such sites will only be permitted if they will not have an adverse effect on
protected sites and wildlife. Bullet Point (i), however, includes the phrase “materially adverse impact”. We do not
consider this to be in line with the Habitats Regulations terminology and recommend this be amended to "adverse
impact" only.
Development Management Policy DM27 (Biodiversity and Geodiversity, p. 133)
The RSPB supports the presumption that damaging development will not be permitted. It is uncertain what is meant by
the phrase "unacceptable impact". We recommend this phrase be replaced with "adverse effect" which has a specific
meaning under the Habitats Regulations.
Table 6.1 (Monitoring Framework, pp. 149-150)
An additional indicator included for Objective 11 (Protecting and Enhancing the Physical Environment) should be
contributions of new development to BAP targets. These should monitor the amount of habitat created and
improvement of the status of key species in the district. Using the BAP targets, especially local targets, this would
provide an indication of whether the Council was meeting its statutory obligations set out in the NERC Act 2006.
RSPB comments on the Sustainability Appraisal
Table 4.3 (Key social, environmental and economic issues in Suffolk Coastal, p.38)
In the ‘Biodiversity’ section Natura 2000 sites are not mentioned. Suffolk Coastal supports five Special Protection Areas
that are internationally important for the bird populations they support. These should therefore be referenced, as well as
the number of Special Areas of Conservation.

Summary: Whilst the RSPB accepts the general conclusions of the updated AA, the RSPB considers that the Core Strategy
remains unsound. Our comments provided in Appendix 1 reflect the inadequate consideration of biodiversity throughout
the document and the need to highlight the importance of Natura 2000 sites within the district. The RSPB recommends
some minor amendments to various policies (for example, Policies SP8 and SP14) that would benefit from greater
reference to the Habitats Regulations4 procedures.

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Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
3899 Object

9 - Limitations to the Assessment

9.1: The evidence base

Respondent: Peter Maddison [503]  
Agent: N/A

Full Text: Despite some minor changes to these documents, there remain inconsistencies and invalid arguments:

1. No accurate and rigorous survey of current visitors to the river Deben has been undertaken. Instead, figures from a 2004 survey, plus information from a totally different habitat (heathland) in a completely different part of the country (Dorset) have been used to make assumptions about the impact of the proposed development on the Natura 2000 sites.

2. If no accurate data are available for the current situation, how is it possible to make an estimate of future visitor impact from the three large developments proposed - Martlesham, Felixstowe and Ipswich Borough Council?

3. Foxhall tip is proposed as the site of a new Country Park, descriptions are given of the facilities it could provide and how it could attract visitors away from the European sites. However at one point it is stated that the Country Park should be available from the start of the developments and then says that "there is uncertainty as to when a country park could be delivered at Foxhall tip".

4. Who will fund and manage the Country Park? - wherever it might be.

Summary: If no accurate data are available for the current situation, how is it possible to make an estimate of future visitor impact from the three large developments proposed - Martlesham, Felixstowe and Ipswich Borough Council?

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Attachments:
Letter from Mr P Maddison
full text
I OBJECT to the findings in the revised Appropriate Assessment dated August 2011.

Issues identified in previous consultation responses have not been addressed in the new version of this document and weight is still given to out of date and inappropriate data.

In Section 5 (sub-sections 5.1 and 5.3) there is unwarranted extrapolation of an inadequate data set relating to European site visitor increases resulting from an increased human population. In sub-sections 5.3.7 to 5.3.13 a figure from the now discredited Oxford Economics Study is used for the number of people per new dwelling.

Claims that people, including residents of the proposed new development, are unlikely to walk further than 1km or drive further than 8km in order to access an area of natural beauty are absurd, as is the reliance on the current limit to available parking in Waldringfield as a means of constraining an increase in visitor numbers that would otherwise result from the new development.

Mention is made of the South Sandlings Survey and the Deben Visitor Survey but these do not appear to have been fed into the conclusions.

No site has been identified for a new country park, and there is no information about the costs of establishing such an amenity. It therefore seems unlikely to me that it will ever be provided, particularly given the continuing pressure on public finances.

I therefore believe that the LDF should be debated further by cabinet.

Claims that people, including residents of the proposed new development, are unlikely to walk further than 1km or drive further than 8km in order to access an area of natural beauty are absurd, as is the reliance on the current limit to available parking in Waldringfield as a means of constraining an increase in visitor numbers that would otherwise result from the new development.

Mention is made of the South Sandlings Survey and the Deben Visitor Survey but these do not appear to have been fed into the conclusions.

Change to Plan

Appear at exam? Not Specified
Legal? Not Specified
Sound? Not Specified
Duty to Cooperate? Not Specified
Soundness Tests None

Attachments:
full text
Email from Mr Wilmot
full text

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Dear Sirs,

Re: Allocation of 2000+ houses at BT Martlesham

We object to the findings in the revised Appropriate Assessment dated August 2011, with regard to the plans to build 2000+ houses at BT Martlesham.

It would appear that some of the issues have not been addressed by the revisions. In addition, out of date and irrelevant data has still been included, whereas new data such as the South Sandlings Survey and the Deben Visitor Survey, acknowledged in the review, have been completely ignored in the conclusions.

We, along with a very large number of local residents, feel strongly that these plans will have a hugely detrimental effect on the immediate and surrounding areas and sincerely hope that the Council will review these plans taking into consideration every single argument against them.

Yours faithfully,

Jurgen & Anne Klahn

Summary:
It would appear that some of the issues have not been addressed by the revisions. In addition, out of date and irrelevant data has still been included, whereas new data such as the South Sandlings Survey and the Deben Visitor Survey, acknowledged in the review, have been completely ignored in the conclusions.

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Attachments: full text

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Martlesham Parish Council
Response to the SCDC Consultation on Updated Sustainability Appraisal and Appropriate Assessment Documents (August 2011)

MPC Response
Martlesham Parish Council is not persuaded that the redrafting of elements of the appropriate assessment and sustainability appraisals has made the Core Strategy any more acceptable or any less flawed in its argumentation. Whilst we are reassured that there is now a clear intent to meet needs in terms of 'well managed access to green space within settlements...without detriment to wildlife and landscape character' there is absolutely no viable demonstration or route map as to how this will actually be achieved save deferral of the issues to the Martlesham Area Action Plan. In our view this is a total abrogation of responsibility that the design of the Core Strategy drew to itself when choosing to incorporate a site specific housing allocation. In essence the Core Strategy fails to meet the test of soundness whilst it incorporates the specific Martlesham housing allocation and does not detail a tangible means of mitigation of acknowledged issues identified by the sustainability appraisal.

Consultation response items
Note: there is no order of importance in the item numbering

1. Provision of open spaces. Neither the Appropriate Assessment (AA) nor the Core Strategy contain any tangible identified land for delivering open space from the outset of the build. AA Reference or Policy: SP20

2. Site Specific Allocation & Mitigation. If the site specific housing allocation is part of the Core Strategy, then the site specific mitigations must also be part of that Core Strategy.
There is at last an acknowledgement that mitigation is required but it has been dropped to the Area Action Plan to resolve.

3. Foxhall Country Park ‘...it will be important that in the MAAP open space is provided...and is available when people first start moving to the site...’ The Waste Core Strategy envisaged landfill ending in 2019 and the site being restored by 2021. Now the Market has changed and Viridor will review the situation possibly extending the mothballing. It is highly unlikely the Country Park will be established by the time the BT Martlesham development is completed. AA Reference or Policy: Page 9

4. Green Space Commitment "The developments should deliver sufficient greenspace to accommodate the increased requirement for local recreation opportunities, so that there are no impacts upon the respective SPAs. The provision of adequate public open space within strategic developments, to provide alternative recreational opportunities for routine use, will include areas which are suitable and attractive for walking dogs off leads. The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites”
Any agreement that Natural England may be deemed to have given is based on the above assumption and yet the document singularly fails to address how this will be achieved. To commit to housing land without a firm commitment to green space does not recognise the scale of the risk if such land is not made available. AA Reference or Policy: para 7.2.8

5. Deben SPA. Effect of development on Deben SPA. Improvements to the evidence base are asked for, but the lack of evidence will not delay the AA & Core Strategy.
It is essential that the Area Action Plan takes a cautious approach to locating development close to the Deben SPA whilst this evidence is gathered. A 1km "gap" is considered far too short with the excellent and well used footpaths already in existence, and the high proportion of leisure cyclists in the Martlesham area.

Summary:
Effect of development on Deben SPA. Improvements to the evidence base are asked for, but the lack of evidence will not delay the AA & Core Strategy.
It is essential that the Area Action Plan takes a cautious approach to locating development close to the Deben SPA whilst this evidence is gathered. A 1km "gap" is considered far too short with the excellent and well used footpaths already in existence, and the high proportion of leisure cyclists in the Martlesham area.

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full text
full text

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4086  Comment
9 - Limitations to the Assessment 9.1: The evidence base

Respondent: Waldringfield Parish Council (Mrs Jean Potter)  Agent: N/A

Full Text:
Paragraphs missing from the image.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
1. move to Adastral Park from somewhere at least equally near the Deben Estuary (approximately)
2. move out of a multiple person household into one with the same or lower occupancy at Adastral Park
3. not be replaced by anyone moving into the area from further afield
4. not be part of a house-moving chain involving anyone moving into the area from further afield

The only places that qualify for inclusion in (1) are: Waldringfield, Newbourne, Hemley, Brightwell, Martlesham Village and Martlesham Heath (just). Kesgrave and Grange Farm are roughly twice the distance from the Deben Estuary so can be excluded, and Woodbridge can be excluded because although it is on the River Deben, it is not on a sensitive part: “the Deben Estuary is not assessed by Natural England as being unfavourable due to human disturbance” (§6.2.35).

The combined populations of these 6 villages is 6,630, so the Appropriate Assessment contains the absurd hidden assumption that 1,400 (21%) of the residents of these villages will move to Adastral Park because of pressures of overcrowding. There is no evidence that there is any overcrowding in these areas, or that there is any desire for the residents to move to the proposed housing at Adastral Park - the idea is quite ludicrous.

The upshot of this is that the figure of 3,462 for the ‘Estimated net increase in people’ for the East Ipswich Plan Area, (Table 3), based as it is on 1.57 new people per dwelling, is a serious under-estimate. It is far more likely that the entire population of the 2,000 new houses at Adastral Park will come from outside the immediate area, and will be about 4,540 (2,000x2.27).

The same criticism can be applied to the Felixstowe, Walton and the Trimleys figure of 2,763 (Table 3).

Point 3, Summary:

The assumptions used to estimate the increase in visitor numbers to the Deben Estuary SPA and other European sites are highly dubious. The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal is logically flawed. There is no justification for choosing the upper limit for the increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal.

The actual increase in the number of people visiting the sites is not given, because the current number of visitors is unknown (because of the lack of a proper survey - see above).

The assumptions given in §§5.3.14 are all highly dubious (except one):

* “the pattern of visits to sites by the new residents is similar to that of the existing population” This is very unlikely.

* The proposed housing is not distributed evenly across the District. The new residents at Adastral Park will live much nearer to the Deben Estuary SPA than the existing population, and those at Felixstowe/Trimleys will live much nearer to the Orwell Estuary SPA. These two areas account for 51% of the total housing allocations for the Suffolk Coastal District, and will substantially alter the population distribution and its proximity to the Deben and Orwell Estuaries.

* “the pattern of visits to sites by day visitors and overnight visitors remains as that identified in the 2004 visitor survey” It is not clear if ‘sites’ is referring to European Sites (the 2004 survey makes no mention of these) or generally to locations. Either way, an increase in the population of Martlesham (due to housing at Adastral Park) will increase the number of day visitors and so change the pattern of visits to sites by day visitors compared to overnight visitors.

* “an increase in visits to sites is not constrained by other factors e.g. lack of public transport, or car parks reaching capacity” OK, this is an acceptable assumption.

* “the relative proportions of day visitors and overnight visitors does not change” Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase.

* “the summer snapshot survey is typical of visitors all year round.” This is very unlikely. Although there is no data to prove it, it seems probable that summer visitors would be more likely to - be more numerous, walk further, cycle, stay in a campsite, engage in family activities such as crabbing, engage in river activities such as sailing, spend more time in the open - than winter visitors.

Table 4 (.§5.3.13), second column reads ‘Estimated increase in people (table 2)’. The data is actually taken from Table 3.

Table 5 (.§5.3.16), second column reads ‘proportion of total AONB day visitors (estimate) from table 1 expressed as a fraction of 1’. The data is actually taken from Table 2.

The calculations in Table 5 and described in §5.3.15 are an attempt to predict the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as stated in the title of Table 6. However, in several places the restriction (in bold above) is not made clear, for example in §5.3.14-16. This gives the impression that it predicts the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from all potential sources. 50.5% of the total day visitors to the AONB come from outside Suffolk Coastal and Ipswich Borough/Pinewood. Increases in the populations in the areas these people come from have been excluded from the calculations. This is unrealistic - Babergh, Tendring, Waveney and all the other nearby districts all have LDF Core Strategies that propose large housing allocations and correspondingly large increases in populations.

The method of calculating the percentage increase in total visitors to the Suffolk Coast and Heaths AONB resulting from proposed growth in Ipswich Borough and Suffolk Coastal, as described in §5.3.15 and shown in Table 5, is logically flawed. Column A only includes day visitors who live in Suffolk Coastal and Ipswich Borough/Pinewood. In Column B this is multiplied by the proportion of visitors who are day visitors (55%). However, the figure of 55% applies to visitors from all locations, not just those from Suffolk Coastal and Ipswich Borough/Pinewood. Common sense tells us that local visitors are more likely to be on day trips than those coming from further afield, and this is confirmed by comparing Map3 (p11) with Map 4 (p12) in the Suffolk Coast and Heaths AONB Survey (2004). It is therefore reasonable to assume that a far larger value than 55% should be used as the multiplier in Column B (the data shown in the Suffolk Coast and Heaths AONB Survey (2004) isn’t sufficiently detailed to tell us what the value should be.) In fact it would be much more realistic to have different multipliers for the different areas - for example we know that about 95% of visitors to Martlesham are on day trips (Suffolk Coast and Heaths AONB Survey (2004) Chart 3), so if most of these came from...
the East Ipswich Plan Area we could use 95% as the multiplier in Column B, 2nd row.

Two of the three assumptions given in Â§5.3.23 are highly dubious:
* "'New' people in the Borough / District will have the same visiting pattern as 'existing' people" This is very unlikely - see comments on Â§5.3.14, first bullet point
* "Visits by holiday makers will not be affected by any increased use by local visitors" It is possible that overcrowding at popular sites will put off holidaymakers. Holiday makers generally want to visit unspoiled countryside; the urbanisation resulting from the housing allocations, particularly at Adastral Park, is very likely to deter holidaymakers.
* "Sites, including their car parks, will not constrain the number of visits by becoming 'full' and turning away visitors" OK, this is an acceptable assumption.

The uncertainties in the calculations are acknowledged by the vagueness of the conclusion (Â§5.3.26): "It would therefore be reasonable to assume that the increase in visitors to European sites in the Suffolk Coast and Heaths AONB, using this survey data, could be in the range of 2% - 5% as a result ... " It would also be reasonable to assume that the increase is far higher than 5%. What justification is there for choosing 5% as the upper limit rather than, say, 10%? The flaws in the methodology, the likelihood that the assumptions in Â§5.3.14 and Â§5.3.23 are invalid, and the inappropriateness of using the Suffolk Coast and Heaths AONB Survey (2004) results in the first place all combine to make this conclusion completely worthless.

Point 4, Summary:
The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the proposed new housing in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area than the average across the AONB. One would expect the increase in the number of visitors to the Orwell and Deben Estuary SPAs to be far greater than the 8.8% estimated for the South Sandlings area. Nowhere is this obvious conclusion stated.

Another reason the figure of 2-5% is worthless is that it is an average across the whole of the AONB. 77% of the proposed new housing is in Ipswich Borough, the East Ipswich Plan Area and the Felixstowe/Trimleys area, all of which are far closer to the Orwell and Deben Estuaries than the other European Sites in the AONB, and these sites will therefore receive a far greater increase in visitors than the average across the whole of the AONB. Even if the figure of 2-5% is correct it tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs. This point is made in Â§5.8.1 with regard to the South Sandlings area "Fewer people living in or east of Ipswich might visit distant parts of the AONB compared to the South Sandlings, thus having a smaller impact over the AONB", but unfortunately the obvious extension of this argument to the Deben and Orwell Estuaries hasn't been made.

"It is a reasonable assumption that an increase in dwellings would generate a proportionate increase in visitors from any particular distance band. For example, if the number of houses doubled in a particular distance band the number of visitors from that area would also double" (Â§5.5.6). We agree with this. It is a pity that this logic can't also be applied to the impact on the Deben Estuary of the 2,000 houses proposed for Adastral Park. The calculation method described in Â§5.5.9 and Â§5.10 seems to be far more realistic than those used in Â§5.3 (criticised above), and there seems to be no good reason why it couldn't also be applied to the Adastral Park - Deben Estuary situation if basic data on visitor numbers were known.

"The distribution of proposed housing is not precisely specified within the Core Strategies." (Â§5.5.7) This is not entirely true. One of our main complaints about the SCDC LDF Core Strategy is that it is very site-specific. 2,000 houses 'to the south and east of Adastral Park' could hardly be more site-specific.

In Â§5.5.12 the increase in the number of visitors to the South Sandlings area as a result of the Ipswich and Suffolk Coastal Core Strategies is predicted to be 8.8% (broadened to 6-12% in Â§5.5.14). Most of the housing proposed in these Core Strategies is far nearer to the Deben Estuary than it is to the South Sandlings area, so one would expect the increase in the number of visitors to the former to be far greater than 8.8%. Nowhere is this obvious conclusion stated. (No estimate is given for the increase in the number of visitors to the Deben Estuary as a result of the Ipswich and Suffolk Coastal Core Strategies, which is a pity as this is the SPA most affected by the extra housing.)

Point 5, Summary:
The claim that people are unlikely to walk further than 1km is absurd. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.

Throughout Â§5.6 various references are made to the ridiculous claims that people are unlikely to walk further than 1km or drive further than 8km. For example: "...only if a number of proposed allocations were within the 1km and 8km distance bands of particular parts of European sites would a cumulative impact occur..." (Â§5.6.6). These are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed. The 1km figure is invalid because:
1. the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
2. the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing. It is almost certain that the reason such a high proportion of visitors walked less than 1km was that they lived less than 1km from the site, so didn't need to walk further.
3. the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
4. the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

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The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk farther than 1km to reach an attractive area like the River Deben. The inappropriateness of the 1km figure is borne out by the Deben Estuary Survey, which shows that 57.1% (far more than the 11% in Dorset) of visitors to the River Deben who arrived on foot walked more than 1km (Deben Estuary Survey, Â§2.19). The average distance travelled by people on foot (3.8km) easily puts the Deben Estuary SPA within the orbit of the proposed LDF Core Strategy site at Adastral Park, and demonstrates clearly that the arbitrary 1km figures is not a sound assumption. "The allocation east of Ipswich around Martlesham could be close to the Deben Estuary SPA" (Â§6.7). The allocation east of Ipswich around Martlesham is close to the Deben Estuary SPA - it is 1.8km away (as the crow flies). The use of the term 'could be' is disingenuous - it implies there is some leeway in where the housing goes, which isn't the case. The LDF Core Strategy specifies 'To the south and east of Adastral Park' which can only mean one thing - BT's land (see BT's planning application C09/0555).

"The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings" (Â§5.8.5). Whilst this is factually correct, its significance is questionable, as the Deben Estuary Survey did not cover the winter period, it simply asked interviewees if they also visited in the winter. "The Deben Estuary visitor survey ... does not have the data or analysis to predict changes in visitor numbers" (Â§5.8.8). This is partly true. A more comprehensive survey carried out by professionals would be needed for that. The survey says: "We hope that the data we have collected is helpful in providing some baseline information from which further studies can be conducted or more realistic projections made regarding increased visitor numbers resulting from the Adastral Park, Martlesham development and the consequent impact on the wildlife." (Deben Estuary visitor survey, Â§1.9). The point is that the Appropriate Assessment makes predictions of increases to visitor numbers without any data on current visitor numbers, so although the Deben Estuary visitor survey isn't scientifically rigorous, it is better than nothing. Â§6.2 Policy SP2. Housing numbers

Point 6. Summary: The estuary-side path between Martlesham Creek and Waldringfield is not in poor repair and people do use it. The conclusion that it is unlikely that many visitors would walk from their homes to the Deben Estuary SPA at Martlesham, and that it is expected there will be no new high levels of disturbance, are based on the flawed assumption that people won't walk more than 1km and an unrealistic reliance on greenspace provision. "... the estuary-side path between Martlesham Creek and Waldringfield is in poor repair and few people use it for more than a short circular walk" There is nothing wrong with the estuary-side path, it is perfectly walkable for about 2.5km up to the breach opposite Methersgate Quay. We agree with most of Â§6.2.28, although the location of the proposed housing is known precisely - it is 'To the south and east of Adastral Park' see comments on Â§5.6.7, above. We agree with the conclusion in Â§6.2.30: "It therefore cannot be ascertained that an allocation of 2320 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA near Martlesham". However, this is then contradicted in Â§6.2.31: "Provided that development is greater than 1km from a Natura 2000 site and that accessibility to the greenspace provision is adequate, it is unlikely that many visitors would walk from their home to the estuary, so this recreational activity would not substantially increase on the foreshore of Deben Estuary SPA at Martlesham, and there is expected to be no new high levels of disturbance ...". The assumption that people won't walk more than 1km is invalid (see our comments on Â§5.6 above), and the reliance on greenspace provision is equally flawed (even if the greenspace appears in time, which is doubtful) - see our comments on Â§7, below. The Deben Estuary Survey showed that 32% of visitors on foot walked more than 3km to the Deben Estuary at Martlesham (Deben Estuary Survey, Â§2.19). "It is considered that the nearest point of the strategic allocation at Martlesham would be, say, 2 - 2.5km from the Martlesham church car park (The Deben Estuary Visitor Survey by NANT of July 2011 gives 2.5km). ' (Â§6.2.34) It depends on whether this distance is 'as the crow flies' or by the shortest road route. The Deben Estuary Survey actually states them as 1.6km and 3.0km respectively (Deben Estuary Survey, Â§3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.2km.

Point 7. Summary: The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren't necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as 'lost due to erosion' is grossly misleading. "The allocation east of Ipswich around Martlesham could be close to the Deben Estuary SPA" (Â§6.7). The allocation east of Ipswich around Martlesham is close to the Deben Estuary SPA - it is 1.8km away (as the crow flies). The use of the term 'could be' is disingenuous - it implies there is some leeway in where the housing goes, which isn't the case. The LDF Core Strategy specifies 'To the south and east of Adastral Park' which can only mean one thing - BT's land (see BT's planning application C09/0555).

"The proportion of visitors who visit all year round was also significantly lower in the Deben Estuary visitor survey compared to the South Sandlings" (Â§5.8.5). Whilst this is factually correct, its significance is questionable, as the Deben Estuary Survey did not cover the winter period, it simply asked interviewees if they also visited in the winter. "The Deben Estuary visitor survey ... does not have the data or analysis to predict changes in visitor numbers" (Â§5.8.8). This is partly true. A more comprehensive survey carried out by professionals would be needed for that. The survey says: "We hope that the data we have collected is helpful in providing some baseline information from which further studies can be conducted or more realistic projections made regarding increased visitor numbers resulting from the Adastral Park, Martlesham development and the consequent impact on the wildlife." (Deben Estuary visitor survey, Â§1.9). The point is that the Appropriate Assessment makes predictions of increases to visitor numbers without any data on current visitor numbers, so although the Deben Estuary visitor survey isn't scientifically rigorous, it is better than nothing. Â§6.2 Policy SP2. Housing numbers

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Point 7. Summary: The limited availability for an increase in visitors arriving by car to Waldringfield only applies at peak times, and even then visitors aren't necessarily deterred - it is common for them to cause extra congestion by parking in the road. Figure 03, which shows the riverside footpaths north and south of Waldringfield as 'lost due to erosion' is grossly misleading. "The allocation east of Ipswich around Martlesham could be close to the Deben Estuary SPA" (Â§6.7). The allocation east of Ipswich around Martlesham is close to the Deben Estuary SPA - it is 1.8km away (as the crow flies). The use of the term 'could be' is disingenuous - it implies there is some leeway in where the housing goes, which isn't the case. The LDF Core Strategy specifies 'To the south and east of Adastral Park' which can only mean one thing - BT's land (see BT's planning application C09/0555).
estuary at Waldringfield (The Deben Estuary Visitor Survey by NANT of July 2011 gives 3km)." (§6.2.35) It depends on whether this distance is ‘as the crow flies’ or by the shortest road route. The Deben Estuary Survey actually states them as 2.0km and 2.5km respectively (Deben Estuary Survey, §3.12), but the distance is easily verified using any accurate map of the area. The distance by public footpaths is roughly 2.1km.

"Estuary-side footpaths north and south of Waldringfield are eroded and impassable, according to data received from Suffolk County Council in August 2011 (see Figure 03). This limits the walking routes available from Waldringfield." (§6.2.36). Figure 03 shows the footpath extending about 1km north of Mipstead, and about 1.5km south of the reservoir as ‘Section lost due to erosion’. This is completely untrue and is grossly misleading. In fact the path north of Waldringfield is breached opposite Mepthesgate Quay about 2/3 of the way along the section shown as ‘lost’, and the path south of Waldringfield is breached just beyond Early Creek, at the southern end the section shown as ‘lost’. In places these paths can get muddy in poor weather, but otherwise are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

Point 8, Summary:
The conclusion that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA is based on the invalid assumption that people won’t walk more than 1km, and the unrealistic reliance on greenspace provision.

"It can be ascertained that an allocation of 1760 new dwellings at Felixstowe / The Trimleys will have no adverse affect upon the Stour and Orwell Estuaries SPA, given a location well over 1km from the estuary and with adequate greenspace provision." (§6.2.42). This is based on the invalid assumption that people won’t walk more than 1km (see our earlier comments on §5.6), and the unrealistic reliance on greenspace provision - see our comments on §7.

Point 9, Summary:
No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment.

No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is important because: “On one estuarine site, disturbance to birds from boats was thought to be the biggest problem” (§5.7.6). Motor boats and jet skis, which create a large wake, also contribute to erosion of the river banks, endangering the delicate saltmarsh ecosystem. This is a serious omission from the Appropriate Assessment.

Point 10, Summary:
The Appropriate Assessment places great reliance on the creation of a new country park as mitigation. This is despite the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space. Even if a site is found it will not have any of the attractive features of the Deben Estuary, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

The Appropriate Assessment places great reliance on the creation of a new country park, which it claims will provide mitigation by diverting visitors (and particularly dog walkers) away from the Deben Estuary. No specific site is suggested, although a location vaguely described as “to the north or north-east of Ipswich” is proposed (§7.2.10). However, no mention is made of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

Various wish-lists of desirable features of this mitigating greenspace are presented throughout §7.2. However, the ones that could actually attract visitors away from the Deben Estuary are conspicuous by their absence. Most people who visit the Deben Estuary do so because of the river. They walk along its banks, their children play on the beach and swim in the river, they sail, fish, birdwatch and engage in many other river-based activities, and of course the Maybush at Waldringfield attracts people from far and wide. A country park will not have any of these attractive features, and cannot possibly be expected to divert significant numbers of people from visiting the Deben Estuary.

There isn’t an abundance of suitable sites “to the north or north-east of Ipswich”. The phrase “to the north or north-east of Ipswich” suggests that it is likely that the site will be west of the A12, and if this is the case then the Deben Estuary will be far more accessible to the residents of the proposed Adastral Park development than the mitigation site, as the A12 presents a significant barrier to walkers.

Following the dubious logic of the Appropriate Assessment, if the mitigating greenspace is more than 1km from the development, visitors are unlikely to walk there. A circle of radius 1km from Adastral Park barely reaches beyond Martlesham Heath to the west or Tesco’s car park to the north, an area that contains no significant candidate spaces, so it is difficult to see where this greenspace could come from. Unless, that is, people are expected to drive to the mitigation site, in which case it won’t have any effect on visitors going to the Deben Estuary on foot, but will increase traffic congestion west of the A12.

Recent evidence from Dorset casts serious doubt on the effectiveness of alternative greenspace in mitigating against increases in visitors to environmentally sensitive sites: “Almost all responding households had some ‘Other’ greenspace within 1.5km. The presence of this ‘Other’ greenspace had no apparent effect on reducing either the likelihood or frequency of visiting heaths... Some of the results suggest that people with more greenspace surrounding their homes may actually visit heaths more... The most critical conclusion is that there appears to be only a slender relationship between the amount of (existing) alternative greenspace nearby and the amount of heathland visits” (East Dorset District Council Public Report - Household Survey, Footprint Ecology, May 2009, p27).
Appropriate Assessment for Core Strategy (August 2011)

4086 Comment

9 - Limitations to the Assessment 9.1: The evidence base

No change has been made to the conclusions on mitigation (§7.4): “It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site.” This of course depends on the mitigation being implemented and available at the start of house building. However, even if it is, it is highly unlikely that “the impacts of additional housing provisions in Policy SP2 and related policies … will be reduced to an insignificant level” (§7.4.1). Where is the evidence that this (as yet hypothetical) mitigation will reduce the ‘adverse effect’ to an ‘insignificant level’? The current number of visitors to the European sites isn't even known, and the increase isn't known either, so how can it be said with confidence that this increase will be eradicated with appropriate mitigation? It is pure speculation, without any basis in fact.

§8 Conclusions

Point 11, Summary:
Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

"It is concluded that policy SP2 would have an adverse effect upon the integrity of a number of European sites, alone and in combination with the Ipswich Borough Core Strategy and Policies." (§8.6.1). This we do agree with. "Mitigation is proposed which, if implemented, would reduce the adverse effect to an insignificant level and would enable a conclusion that it can be ascertained that there will be no adverse effect upon the integrity of any European site." (§8.6.1). As explained above, given that no sites or funding have been found, mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. We believe there is no justification for this optimism, and that it is little more than fanciful daydreaming. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

§9.2 Further work needed

Point 12, Summary:
It is claimed that further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. Yet it is acknowledged that the data upon which major decisions have been based is poor. No attempt will be made to get better data before the decisions are formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment’s conclusions. This is not how decision making is supposed to work.

"Although it would have been desirable to have had better evidence of visitor numbers on European sites, it would not be reasonable to delay the Appropriate Assessment, and therefore the Core Strategies and Policies, for a number of years until further evidence was collected." (§9.1.1). This decision was made in 2009. If SCDC had instead decided to commission a proper visitor survey at that time, it would probably be complete by now (2 years later), and could have provided a far more reliable basis for assessing the impact of the housing proposed in the Ipswich Borough and Suffolk Coastal Core Strategies.

Having acknowledged that the data is poor, the Appropriate Assessment makes the highly dubious claim that: “further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress.” (§9.2.3) So a major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment’s conclusions. This is not how decision making is supposed to work.

Summary:
It is claimed that further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress. Yet it is acknowledged that the data upon which major decisions have been based is poor. No attempt will be made to get better data before the decisions are formally adopted, when it will be too late to change, even if new data contradicts the Appropriate Assessment’s conclusions. This is not how decision making is supposed to work.

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Attachments:

Full letter

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
3834 Object

9 - Limitations to the Assessment 9.2: Further work needed

Respondent: Mr James Barclay [2495] Agent: N/A

Full Text: 9.2.3 Further work is required before major decisions can be made. The AA is incomplete, a shoddy piece of work and unsound. It relies on unsound information, irrelevant comparisons and muddled thinking. Worst of all it is misleading and devious.

Summary: 9.2.3 Further work is required before major decisions can be made. The AA is incomplete, a shoddy piece of work and unsound. It relies on unsound information, irrelevant comparisons and muddled thinking. Worst of all it is misleading and devious.

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3850 Object

9 - Limitations to the Assessment  
9.2: Further work needed

Respondent: Mr Tim Elliot [388]  
Agent: N/A

Full Text: I object to SCDC accepting this document while it is self-admittedly incomplete and likely to change. A major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if the new data contradicts the policy.

Summary: I object to SCDC accepting this document while it is self-admittedly incomplete and likely to change. A major decision has been based on admittedly poor data, and no attempt will be made to get better data before the decision is formally adopted, when it will be too late to change, even if the new data contradicts the policy.

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Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).
Dear Sir/Madam

Please see below my comments and reasons for my strong objection to the allocation of 2000 homes on the land owned by BT (and others) adjacent to Adastral Park. These are based on my opinion that the Appropriate Assessment is flawed in its methodology and illogical in the conclusions it draws.

The Habitats Directive Article 6(3), contains two important requirements: (a) that any plan or project which is likely to have a significant effect on a Special Area of Conservation must be the subject of an appropriate assessment by a competent national authority; and (b) that the authority may only approve the plan or project when it has ascertained that there will be no adverse effect on the SAC. Specifically it states:

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

It is my opinion that the August 2011 revision of the Appropriate Assessment fails to demonstrate that the BT site allocation will not have an adverse effect on the SACs in the surrounding area for the following reasons:

1) The previous version of the AA took into account the data contained in the survey of visitors to the Sandlings area to the NE of Woodbridge. This looked at visitor numbers from a wide area, including for example Ipswich, the IPA portion of SCDC, and the Felixstowe area, and drew conclusions about the degree of impact on that Sandlings area. However the AA went on to draw conclusions about the impact, or otherwise, of the proposed developments (including the BT site) on the SACs in the vicinity of the BT site, despite the fact that there was no data to justify this conclusion, and was based erroneous information about car parking for members of the public at the locations which would give access to the Deben SACs (the AA said there was none, whereas in fact there is at all the relevant locations).

2) The revised August version of the AA has now corrected these errors and makes reference to the small scale study carried out by NANT (which shows that there will be a risk that increased visitor numbers will have an adverse effect on the SAC). However these revisions to the document do not address the continuing fundamental issue that no substantive data is available to assess the degree of risk. Para 9.2 points to the need for further studies.

3) The previous version used the absence of car parking as part of its justification for saying there was little risk. Now that the latest document states (somewhat grudgingly) that there IS in fact car parking it cannot logically follow that the risk is now no greater than was stated in the previous version.

4) The August AA specifically says in para 7.2.6:

"Further mitigation to reduce harm, as described in paragraphs 7.2.7 - 7.2.15 below remains to be required. A planning application Appropriate Assessment would be needed to look at site- and plan-specific issues. Natural England advised in its email of 15th February 2011 to Suffolk Coastal District that it believes 'that any adverse effects on N2K sites could be mitigated by the use of planning conditions/obligations/legal agreements (S106) to allow us to conclude no adverse effect on integrity. Suitable strategies are detailed in our letter to SCDC of 12 February 2010 which could be employed following AA at project level.'"

The AA also states in para 7.2.8

"The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites"

At the present time there is no information publicly available to demonstrate that there ARE any viable and effective mitigation solutions which are realistically deliverable in the timescale to meet the requirement set out in para 7.2.8. The amount of green space available on the BT site will be very limited for many years due to the mineral extraction programme. The only other nearby site which has been mentioned is the conversion of the Foxhall landfill site into a country park. This site has just completed a programme to line out and prepare capacity for another 300,000 cubic
metres. However the current rate of inert landfill being deposited is some 2000 tons pa, so it clear that unless the rate of landfill is very dramatically changed it will not be available for at least a generation and probably much longer. And even when it is completed and capped off it will require several years to settle and be made safe before public access can be considered. Therefore to even suggest that this site is likely to address the area’s need for diversionary green space with the timeframe of the LDF is misleading. The final suggestion that the open space be linked to the PRoW in the area ignores the fact that most of the PRoWs in the area (and certainly those most likely to be attractive to residents on the BT site) go towards the SACs and so will serve only to increase visitors numbers. One final point on this subject is that the proposal is that use of cycles will be encouraged (with dedicated cycle storage etc). This, in turn will encourage residents to cycle down to the Deben (which is about 10 minutes away via an existing bridleway).

Given that the LDF is very site specific with respect to the BT land, and that this is already the subject of two planning applications, it must be presumed that, if the LDF is approved in its present form, the BT development will go ahead. For the Council to suggest otherwise would be startlingly disingenuous. Therefore if the AA is approved (and inter alia the LDF) it is my strong view that any mitigation measures should be firmly identified and evaluated as being effective before the LDF is approved. If the council fails to do this then there is a very real risk that building will go ahead but the mitigation measures will not materialise - either because none can be identified, or cannot be delivered within the timescales set out in para 7.2.8 of the AA.

5) If, despite all the reservations and concerns expressed above, SCDC go ahead and approve the LDF and subsequently take the BT application to planning committee, SCDC should publicly assure its residents that approval WILL NOT be given unless and until substantive and deliverable mitigation measures are identified which are a) evidence based using real visitor data and b) deliverable in the timescales set out in the AA. These are issues which should not be swept under the carpet for later assessment as by then it will be too late to reverse any consents given.

Yours faithfully

Stephen Denton

Summary: The revised August version of the AA has now corrected these errors and makes reference to the small scale study carried out by NANT (which shows that there will be a risk that increased visitor numbers will have an adverse effect on the SAC). However these revisions to the document do not address the continuing fundamental issue that no substantive data is available to assess the degree of risk. Para 9.2 points to the need for further studies.
Please see below my comments and reasons for my strong objection to the allocation of 2000 homes on the land owned by BT (and others) adjacent to Adastral Park. These are based on my opinion that the Appropriate Assessment is flawed in its methodology and illogical in the conclusions it draws.

The Habitats Directive Article 6(3), contains two important requirements: (a) that any plan or project which is likely to have a significant effect on a Special Area of Conservation must be the subject of an appropriate assessment by a competent national authority; and (b) that the authority may only approve the plan or project when it has ascertained that there will be no adverse effect on the SAC. Specifically it states:-

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

It is my opinion that the August 2011 revision of the Appropriate Assessment fails to demonstrate that the BT site allocation will not have an adverse effect on the SACs in the surrounding area for the following reasons:

1) The previous version of the AA took into account the data contained in the survey of visitors to the Sandlings area to the NE of Woodbridge. This looked at visitor numbers from a wide area, including for example Ipswich, the IPA portion of SCDC, and the Felixstowe area, and drew conclusions about the degree of impact on that Sandlings area. However the AA went on to draw conclusions about the impact, or otherwise, of the proposed developments (including the BT site) on the SACs in the vicinity of the BT site, despite the fact that there was no data to justify this conclusion, and was based erroneous information about car parking for members of the public at the locations which would give access to the Deben SACs (the AA said there was none, whereas in fact there is at all the relevant locations).

2) The revised August version of the AA has now corrected these errors and makes reference to the small scale study carried out by NANT (which shows that there will be a risk that increased visitor numbers will have an adverse effect on the SAC). However these revisions to the document do not address the continuing fundamental issue that no substantive data is available to assess the degree of risk. Para 9.2 points to the need for further studies.

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The AA also states in para 7.2.8

"The development of the public open space would be timed to either precede or coincide with the first phase of housing development, as people would be expected to establish walking habits (including dog walking) as soon as they moved to the development. The open green space would also be linked to PRoW in the area in such a way as to provide a network of paths and circular walks to attract people away from designated sites"

At the present time there is no information publicly available to demonstrate that there ARE any viable and effective mitigation solutions which are realistically deliverable in the timescale to meet the requirement set out in para 7.2.8. The amount of green space available on the BT site will be very limited for many years due to the mineral extraction programme. The only other nearby site which has been mentioned is the conversion of the Foxhall landfill site into a country park. This site has just completed a programme to line out and prepare capacity for another 300,000 cubic metres. However the current rate of inert landfill being deposited is some 2000 tons pa, so it clear that unless the rate of landfill is very dramatically changed it will not be available for at least a generation and probably much longer. And even when it is completed and capped off it will require several years to settle and be made safe before public access can be considered. Therefore to even suggest that this site is likely to address the area's need for diversionary green space with the timesframe of the LDF is misleading. The final suggestion that the open space be linked to the PRoW in the area ignores the fact that most of the PRoWs in the area (and certainly those most likely to be attractive to residents on the BT site) go towards the SACs and so will serve only to increase visitors numbers. One final point on this subject is that the proposal is that use of cycles will be encouraged (with dedicated cycle storage etc). This, in turn will encourage residents to cycle down to the Deben (which is about 10 minutes away via an existing bridleway).

Given that the LDF is very site specific with respect to the BT land, and that this is already the subject of two planning applications, it must be presumed that, if the LDF is approved in its present form, the BT development will go ahead.

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5) If, despite all the reservations and concerns expressed above, SCDC go ahead and approve the LDF and subsequently take the BT application to planning committee, SCDC should publicly assure its residents that approval WILL NOT be given unless and until substantive and deliverable mitigation measures are identified which are a) evidence based using real visitor data and b) deliverable in the timescales set out in the AA. These are issues which should not be swept under the carpet for later assessment as by then it will be too late to reverse any consents given.

Summary: The revisions to the AA to adjust the details regarding car parking and acknowledge the small scale study carried out by NANT do not address the fundamental issue that no substantive data is available to assess the degree of risk. Para 9.2 points to the need for further studies.
I object to the revised sustainability appraisal and appropriate assessment of the core strategy on the grounds that there are a large number of errors in the document. I highlight the main ones below.

APPROPRIATE ASSESSMENT

Table 3 estimates the increase in population as a result of the proposed housing. It takes a value of 1.57 as the number of new people per dwelling. No justification is provided for this value. Since the total number of people arising from these houses is a key input to this report this is unacceptable. Either this number is justified or a much higher number assumed to provide a margin of error. In any case the conclusions based on this value are suspect and should be identified as such. Further on in the document it states that the low figure of 1.57 is due to an unstated assumption that roughly one third of the future residents of any new housing will move out of existing housing in the area and hence will not be adding to the number of extra people living near the sensitive sites. This is an unproven assertion and again any conclusions based on this should be removed unless it can be proven or justified.

The document comments about lack of parking in the area limiting the number of people visiting. But this only applies at peak times. For the majority of the time parking is not an issue.

The document states "Estuary-side footpaths north and south of Waldringfield are eroded and impassable ... This limits the walking routes available from Waldringfield." This is true but does not mean that no one will ever use the path. It is still used along its navigable part.

Having acknowledged that the data is poor, the assessment makes the unsupportable claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." Since a major planning decision is being made on this evidence it beggars belief that the council can ignore this fundamental weakness. There appears to be no intention of obtaining any further evidence either. Is this because it might actually contradict the conclusions of this assessment?

No change has been made to the conclusions which the assessment reaches regarding mitigation: "It is ascertained that, with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site." This is only true if mitigation is actually implemented and is available at the start of house building. There is no mention of the fact that no actual mitigation site has been found, SCC have ceased funding country parks, and no timetable has been proposed for the creation of this hypothetical green space.

The impact of extra people visiting the Waldringfield area is discussed in the document. There has been no alteration of the unsubstantiated claim that people are unlikely to walk further than 1km or drive further than 8km. These claims are based on a 2006 Dorset study. The appropriateness of using this data out of context has been questioned by Waldringfield PC, Natural England and others, but their criticisms have been ignored - none of the 4 points below have been addressed. The 1km figure is invalid because:

the Deben Estuary is a completely different habitat from the areas studied in Dorset, which are lowland heathland
the pattern of housing in the surrounding areas is different, indeed some of the Dorset sites are completely surrounded by urban or suburban housing.
the Dorset heathland sites lack any features comparable to the River Deben, with its sailing opportunities, river walks, beach and popular riverside pub.
the Dorset study is 5 years out of date and has been superseded by later studies in the same area, which partially contradict it.

The 1km cut-off figure makes no sense in the context of the Deben Estuary, and it is very likely that many people will walk far further than 1km to reach an attractive area like the River Deben. This was confirmed by a study made by NANT, which showed that people walked an average of 3.8km to the Deben Estuary.
Although the document admits that there is only a small amount of data regarding visitor numbers to sites in Europe it goes on to draw a significant number of important conclusions from this data. This is a flawed approach and requires either more data to substantiate the claim or that the conclusions drawn be removed from the document.

Finally the true increase in the number of people visiting the sites cannot be given because the current number of visitors is unknown as no accurate survey has been undertaken.

SUSTAINABILITY APPRAISAL

In the review of SCDC's responses to consultation comments on the sustainability assessment and Reviewed Core Strategy many of the responses are inadequate and many simply state "No change to SA required" without any attempt to justify why this might be. Given the significance of the core strategy this is not acceptable.

This policy is described as "marginally more sustainable" by virtue of "the creation of a countryside park on the Foxhall tip by the end of the plan period". The reference to the Foxhall Tip is contradicted in the last paragraph where it states that designated areas will need to be safeguarded "by providing open space as part of the housing development at the beginning of the development". Also it is pointed out that "Foxhall Country Park is unlikely to be developed within the plan period". Consequently the policy is not more sustainable than before and in fact is less sustainable since no proposals have been made for any countryside parks at the beginning of the development.

Only the briefest mention is made of the potential impact of increased boating activities on the River Deben. In fact this is a potentially serious problem and has been ignored and passed across to the area action plan. Large boats, and particularly motor boats, have a powerful disturbing affect on feeding birds, and they are a major cause of erosion of the fragile saltmarsh ecosystem. This point has been made several times by NANT and Waldringfield PC and has been consistently ignored.

The document states "There is uncertainty as to when a country park could be delivered at Foxhall tip". The key point is that it will not be in place when any development on the 2000 houses at Martlesham begins. In spite of this the assertion is still present in the document that these 2,000 houses will have an insignificant impact on the nearby European sites. This will only be the case if mitigation appears at the start of house building, and is very unlikely to happen.

Summary: Having acknowledged that the data is poor, the assessment makes the unsupportable claim that: "further work is not immediately required for this Appropriate Assessment or the Core Strategies and Policies to progress." Since a major planning decision is being made on this evidence it beggars belief that the council can ignore this fundamental weakness. There appears to be no intention of obtaining any further evidence either. Is this because it might actually contradict the conclusions of this assessment?

Change to Plan

Not Specified Not Specified Not Specified Not Specified None

Attachments: 

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I OBJECT to the conclusions of both the Appropriate Assessment and Sustainability Appraisal. The Appropriate Assessment draws wide-ranging conclusions which are based on out-of-date and largely irrelevant data, absurd assumptions and flawed logic. No attempt has been made to find out basic information such as the current number of visitors to the Deben and Orwell Estuaries. Far too much reliance is placed on mitigation to magically turn an ‘adverse effect upon the integrity of a number of European sites’ into an ‘insignificant level’ with ‘no adverse effect upon the integrity of any European site.’ (§8.6.1).

The Sustainability Appraisal also places far too much reliance on mitigation, ignoring the fact that a mitigation site hasn’t been found, is unfunded and is unlikely to deter visitor for going to the Deben and Orwell Estuaries even if it does materialise on time.

All the points I have made in previous consultation responses still stand.

Detailed Comments

Sustainability Appraisal

Many of SCDC's responses to the consultation comments are inadequate

I will however only comment on the response to my own consultation comments (RepId: 3354):

My Comments

The Sustainability Appraisal should have been rewritten in the light of the potentially significant changes to the LDF Core Strategy. Admittedly, very little has actually changed, but that is not the point - the removal of the RSS has opened up many new possibilities which should have been evaluated for sustainability. For example, the constraints on the housing numbers and their distribution between the IPA [now the EIPA] and the rest of the district have been completely removed. No assessment of the sustainability of a more even housing distribution or a variety of different overall housing numbers has been done

SCDC's Response

Noted. New options for housing pending the abolition of the RSS have not been presented for appraisal. The Council has looked at the new evidence gathered and decided on an appropriate housing number and distribution.

No change to the SA required.

My Response to SCDC's Response

SCDC's response completely misses the point: the sustainability of all the options should have been assessed, and the decisions about housing numbers and distribution based on those assessments. Instead, these decisions were made without any regard to the sustainability of the various options.

Policy SP20 is not more sustainable

The policy SP20 Ipswich Policy Area is described as marginally more sustainable, on the basis of the creation of a country park at the Foxhall Tip. But this is unlikely to be developed within the plan period, so the policy could not have become more sustainable.

The Area Action Plan will not solve the problem of traffic congestion or safeguard the designated wildlife areas. The idea that an Area Action Plan will solve these problems is absurd. By the time it is produced it will be too late - the decision to build 2,000 houses at Martlesham will already have been adopted, and it is likely that planning application will have been approved on the basis of 'interim planning policies'.

The impact of boating on the River Deben is ignored

Boats, particularly large motor boats, have a powerful disturbing affect on feeding birds, and they are a major cause of erosion of the fragile saltmarsh ecosystem. This problem dramatically affects the sustainability of SP20 and SP21, but is largely ignored. It will not be solved by relegating it to the Area Action Plan.

The sustainability of SP21 has come down dramatically

It is absurd that the score for SP21 (Felixstowe) remains unchanged at 14.5, despite the number of new houses allocated there having increased by 44%, from 1,000 to 1,440.

The risks of over-reliance on mitigation aren't recognised

It is acknowledged that there is uncertainty as to when a country park could be delivered at the Foxhall tip site, but the assertion is still being made that 2,000 houses at Martlesham will have an insignificant impact on the nearby European sites. This entirely dependent on mitigation appearing at the start of house building, and this looks extremely unlikely to happen.

Appropriate Assessment

Conclusions are not based on up-to-date, scientifically valid data

Important conclusions are drawn about visitor numbers and the impact of the proposed housing on the European sites,
and these conclusions are used to justify the LDF Core Strategy’s policies, particularly SP20 and SP21. These are based on one out-of-date visitor survey of the AONB as a whole (and the South Sandlings Survey (2010) which only covers a small number of sites which aren’t the ones most affected).

There is no up to date data on visitor numbers to the Deben or Orwell Estuaries. The Suffolk Coast and Heaths AONB survey (2004) covers the AONB as a whole but makes no mention of the European Sites of concern to the Appropriate Assessment. The AONB as a whole and the European Sites within it are regularly confused, with arguments jumping from one to the other without explanation. A proper, scientifically rigorous survey should be carried out of visitor numbers to the Deben Estuary and how these affect wildlife. Without this the conclusions about visitor numbers and their impact on European Sites and their wildlife are little more than guesswork.

The estimate of increases in visitor numbers is seriously flawed.
There are many problems with the estimate of increases in visitor numbers:
* It is based on the Suffolk Coast and Heaths AONB survey (2004), which is 7 years out-of-date
* The Suffolk Coast and Heaths AONB survey (2004) cover the whole AONB, not individual sites
* The estimates are based on dubious assumptions, for example, that the relative proportions of day visitors and overnight visitors will not change (A§5.3.14) (Day visitors are more likely to live locally than overnight visitors, so if the local population increases the proportion of day to overnight visitors is likely also to increase)
* It is based on the highly implausible assumption that about a third of the new occupants of the proposed development at Adastral Park will move there from nearby villages because of pressures of overcrowding.
* The figure of 2-5% for the increase in visitors to European sites in the AONB is worthless. It tells us nothing about the increase in visitors to the Orwell and Deben Estuary SPAs, which are far closer to the new housing proposed in SP20 and SP21 than the average across the AONB.
* The ridiculous claim that people are unlikely to walk further than 1km is still there, despite its flaws having been pointed out on numerous occasions. It is based on data from an out of date study in Dorset, taken completely out of context. The Deben Estuary is a different habitat from the areas studied in Dorset, the pattern of housing in the surrounding areas is different and the Dorset heathland sites lack any features comparable to the River Deben. There is strong evidence that many people will walk far further than 1km to reach an attractive area like the River Deben.

Information regarding the state of the footpaths around Waldringfield is incorrect
Figure 03, which shows the riverside footpaths north and south of Waldringfield as ‘lost due to erosion’ is misleading. These paths are perfectly walkable up to the breaches. People regularly walk these paths and simply turn back at the breaches.

The impact of boating on the River Deben is ignored
No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment. This point has been made many times before and has consistently been ignored.

Unrealistic reliance is placed on mitigation to solve the problems created by SP20 and SP21
Mitigation is unlikely to be implemented at the start of house building, and even if it is, it is unlikely to be effective. The conclusion that mitigation would reduce the adverse effect on the integrity of a number of European sites to an insignificant level is totally unrealistic. To risk the future of the Deben Estuary and other nearby environmentally sensitive sites on this flimsy hope is the height of irresponsibility.

Summary:
The impact of boating on the River Deben is ignored
No attempt is made to assess the potential increase in boating activity on the River Deben as a result of the new housing proposed in the Ipswich and Suffolk Coastal Core Strategies. This is a serious omission from the Appropriate Assessment. This point has been made many times before and has consistently been ignored.

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Appropriate Assessment for Core Strategy (August 2011)

Object

9 - Limitations to the Assessment

9.2: Further work needed

Respondent: Rosa Waller [499]  
Agent: N/A

Full Text: I OBJECT to the findings in the AA and SA as follows:

Appropriate Assessment
1. Assessment of European site visitor increases

OBJECTION
Summary
The data regarding visitor numbers to the Deben SPA is acknowledged to be inadequate - i.e. none exists apart from the Deben Visitor Survey (NANT). Therefore projections regarding the increase in visitor numbers resulting from the proposed housing at Adastral Park are guesswork. As are the resulting projections of potential damage and disturbance to environmentally sensitive sites. It behoves SCDC to conduct proper rigorous studies of visitor numbers to the Deben SPA to create a baseline against which to make realistic assessments.

2. Impact on specific sites

OBJECTION
Summary
It is inappropriate to attempt to predict the impact on the Deben SPA of the inhabitants of 2000 houses at Adastral Park from studies relating to completely different habitats (i.e. Dorset heathland) which are not comparable. The Deben is a tidal estuary, beautiful, remote, wild with many special environmental features and other attractions. NANT's Visitor Survey showed clearly what a draw the river is and that people with dogs walk/drive a great deal more than 1/8kms suggested here. Proper relevant research needs to be done.

3. Assessment of Policy SP2 Housing numbers

OBJECTION
Summary
The potential for problems and threats to the integrity of the Deben SPA from siting housing at Adastral Park is acknowledged (6.2.28 and 6.2.30) but SCDC continue to assert wrongly (see above) that people will walk/drive only 1/8kms. The need to provide adequate alternative green space is stated without indicating where/what that might be (see below). Contrary to what is stated at 6.2.35 there is now considerable public car parking available in Waldringfield thus increasing the attractiveness of the location. Contrary to what is stated in 6.2.36 the available riverside route remains attractive for walkers (see below).

4. Mitigation for Policy SP2

OBJECTION
Summary
It is disingenuous to continue to insist that the housing policies will have "no adverse effect" on the integrity of the Deben Estuary SPA (7.4.1). The discredited 1km figure is wheeled our again to justify development at Adastral Park (7.2.6). Provision of alternative green space should "precede or coincide with" Phase 1 of housing development (7.2.8). Although the idea of a country park is talked up the reality is that no site is available to precede of coincide with phase 1 and anyway SCC no longer funds country parks so it is a matter of pure speculation.

5. Limitations to the Assessment - Further work needed

OBJECTION
Summary
It is scandalous that having admitted that this policy is based on poor and inadequate data SCDC let themselves off the hook by claiming that they don't need to improve the quality of the data before adopting the Core Strategy and therefore opening the door to the building of 2000 houses at Adastral Park. SCDC need to make policy on the basis of sound and robust data not guesswork and speculation when so much is at stake.

Sustainability Appraisal

1. Appraisal of Core Strategy Policies - Ipswich Policy Area (SP20)

OBJECTION
Summary
It is incorrect to claim that SP20 is "marginally more sustainable" because the policy "seeks to preserve and enhance environmentally sensitive locations" by creating a country park at Foxhall Tip by the end of the plan period. AS stated above alternative green space has to be available at the beginning of the development to act as so-called mitigation in relation to building at Adastral Park.

2. SP20 Ipswich Policy Area

OBJECTION
Summary
It is unacceptable to devolve responsibility for safe-guarding Waldringfield and the Deben Estuary to an Area Acton Plan. Issues like congestion, traffic impacts and the increasing number of boats on the river causing problems to feeding birds and erosion of saltmarsh, the preservation of wildlife and habitat all need to be addressed now otherwise the policy is utterly flawed. The LDF needs to be based on robust policies that have addressed these problems and issues at the outset rather than kicking them into the long grass of an AAP.

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3. Ipswich Policy Area SP20

OBJECTION

Summary
Again the discredited figure of 1km (see above) is used here to suggest that the integrity of the Deben Estuary can be maintained so long as building is more than 1km away from the river. The NANT survey showed that people walk much more than 1km and therefore 2000 houses at Adastral Park will generate a huge increase in visitor numbers. SCDC are also wrong to suggest that signs saying “no through route” at Waldringfield deter walkers and thereby claim that birds are protected in those areas.

4. Uncertainties and risks (6.9)

OBJECTION

Summary
If additional greenspace is required as mitigation for the 2000 houses at Adastral Park and there is grave uncertainty that it can be delivered at Foxhall Tip (the only potential site mentioned) then this already flawed plan should not go ahead.

The Appropriate Assessment and the Sustainability Appraisal have not addressed the issues of concern that I have raised before.

Summary:
It is scandalous that having admitted that this policy is based on poor and inadequate data SCDC let themselves off the hook by claiming that they don’t need to improve the quality of the data before adopting the Core Strategy and therefore opening the door to the building of 2000 houses at Adastral Park. SCDC need to make policy on the basis of sound and robust data not guesswork and speculation when so much is at stake.

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### Object

**10 - Iterations and Conclusions**

**10.3: Consultations with the Public**

**Respondent:** Angie Vale [37]  
**Agent:** N/A

**Full Text:**
I OBJECT to the findings in the revised AA dated August 2011. The issues in my previous consultation responses have not been addressed by the revisions. The AA still gives inappropriate weight to out of date & irrelevant data. New data, such as the South Sandlings Survey & the Deben Visitor Survey have been acknowledged but then ignored in the conclusions. Mitigation measures include a new country park but no site has been identified or costed. On the basis of these revisions the LDF should be returned to the cabinet for further debate.

**Summary:**
I OBJECT to the findings in the revised AA dated August 2011. The issues in my previous consultation responses have not been addressed by the revisions. The AA still gives inappropriate weight to out of date & irrelevant data. New data, such as the South Sandlings Survey & the Deben Visitor Survey have been acknowledged but then ignored in the conclusions. Mitigation measures include a new country park but no site has been identified or costed. On the basis of these revisions the LDF should be returned to the cabinet for further debate.

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### Appropriate Assessment for Core Strategy (August 2011)

#### Object

| 10 - Iterations and Conclusions | 10.3: Consultations with the Public |

**Respondent:** Mr Jonathan Ruffle [2578]  
**Agent:** N/A

**Full Text:**

> "10.3.5 These comments were used in this update of the Appropriate Assessment."

Please refer to my responses argued at length for the September 2009 AA. The vast majority of points have not been addressed, so please don't tell me they have.

**Summary:**

> "10.3.5 These comments were used in this update of the Appropriate Assessment."

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The Sustainability Appraisal also places far too much reliance on mitigation, ignoring the fact that a mitigation site hasn’t been found, is unfunded and is unlikely to deter visitor for going to the Deben and Orwell Estuaries even if it does materialise on time.

All the points I have made in previous consultation responses still stand.

Detailed Comments

Sustainability Appraisal
Many of SCDC's responses to the consultation comments are inadequate. I will however only comment on the response to my own consultation comments (RepId: 3354):

My Comments
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Boats, particularly large motor boats, have a powerful disturbing affect on feeding birds, and they are a major cause of erosion of the fragile saltmarsh ecosystem. This problem dramatically affects the sustainability of SP20 and SP21, but is largely ignored. It will not be solved by relegating it to the Area Action Plan.

The sustainability of SP21 has come down dramatically
It is absurd that the score for SP21 (Felixstowe) remains unchanged at 14.5, despite the number of new houses allocated there having increased by 44%, from 1,000 to 1,440.

The risks of over-reliance on mitigation aren't recognised
It is acknowledged that there is uncertainty as to when a country park could be delivered at the Foxhall tip site, but the assertion is still being made that 2,000 houses at Martlesham will have an insignificant impact on the nearby European sites. This entirely dependent on mitigation appearing at the start of house building, and this looks extremely unlikely to happen.

Appropriate Assessment

Conclusions are not based on up-to-date, scientifically valid data. Important conclusions are drawn about visitor numbers and the impact of the proposed housing on the European sites.
and these conclusions are used to justify the LDF Core Strategy’s policies, particularly SP20 and SP21. These are based on one out-of-date visitor survey of the AONB as a whole (and the South Sandlings Survey (2010) which only covers a small number of sites which aren’t the ones most affected).

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