

WALDRINGFIELD PARISH COUNCIL

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Mr P Ridley
Head of Planning Services
LDF Updated Preferred Options
Suffolk Coastal District Council
Melton Hill
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Dear Mr Ridley

Comments on LDF Core Strategy Housing Distribution Updated Preferred Option 7/09 by Waldringfield Parish Council

Summary

Waldringfield Parish Council strongly objects to the increase in IPA housing numbers, which will make all the disastrous impacts of the proposed new town at Adastral Park even worse. There is no justification for going beyond the 1,050 figure, and there is no need to create a 'new community'. This totally inappropriate development will urbanise a beautiful rural area and have an overwhelming impact on local communities, the road system and the environment.

Distributing the houses over the IPA or the whole of the district would lessen the impact on any one community and provide much needed affordable rural housing.

Section 1.02

"No decision will be taken in respect of individual sites submitted to the Council until the Core Strategy has been **all but agreed**" [our emphasis]. With the possible exception of very small scale, uncontroversial developments, no decisions should be taken until the Core Strategy has been **fully adopted**, i.e. has passed the independent examination stage.

Sections 2.0, 4.01 & 8.02

"Comments are now sought solely in respect of these limited aspects of the Updated Preferred Option 7/09", "This consultation is therefore **very focused**" Waldringfield Parish Council complained to Phil Ridley, SCDC Head of Planning, that the public will not be given any opportunity to use the new evidence (that has only been made available since the previous consultation, as listed in Appendix 1) to inform their comments on anything in the LDF other than these 'limited aspects'. We argued that policies and strategies that were formulated before this evidence became available cannot be changed now that the evidence is available, and that there is no justification for denying the public the opportunity to comment on the broad strategy and policies in the light of evidence that has only appeared since the previous consultation.

Mr Ridley's response contained the following, which does answer our point:

"Whilst such comments [on the strategic housing] may raise wider issues, these issues should be framed and will be considered in the context of the revised housing distribution."

"If your council is of the opinion that these recent evidence base documents have a direct impact on other district wide policies, then I would advise you to include those comments in your response. In doing [so] it would help if you explained why and how the evidence base document affects other parts of the document and in your Council's opinion what changes would be required."

However, the misleading instructions in the document itself have not been changed, so most people will not realise that they are allowed to comment on wider issues than the housing numbers. This undermines the validity of the consultation exercise.

Section 3.05

"... not everyone will be happy with what is proposed" This is true! In fact there has been an almost unanimous rejection of the proposed strategy by people living in the affected areas of the IPA and the Colneis peninsular. For example, in the Preferred Options consultation an analysis of individual responses to SP3 (Strategic Policies, Ipswich) reveals that 2 respondents supported the policy and 86 objected to it. The implication of this argument is '*whatever we do, someone will be unhappy, so we can ignore public opinion*'. This is simply not true – there are other strategies (e.g. dispersed housing across the whole district) that would almost certainly be less unpopular than the one proposed.

Section 5.09

"The main concerns related to the area East of Ipswich and Felixstowe/Walton and the Trimley villages where the bulk of the new homes are proposed. It is essentially in response to these issues that the original housing distribution strategy is now proposed to be revised." The implication of this is that the updated housing distribution (i.e. an **increase** in the IPA allocation from 1,050 to 2,000 houses) is in response to the concerns of the public. In fact it is exactly the opposite of what the public said in response to the previous consultation, in which the overwhelming majority objected to the concentration of 1,050 houses in one place.

Section 5.12

"... the broad scale and distribution of development has evolved and refined over time as a result of public consultation" The decision to concentrate the housing distribution in the IPA into one large site was taken in complete opposition to the results of public consultations. For example, the *February 2007 Issues & Options* consultation produced the following result:

- Option 1 (1 large site): 14%
- Option 2 (2 or 3 large sites): 51%
- Option 3 (a number of small sites): 35%

However, in the following consultation (*February 2008, Further Issues & Options*), one of the questions was "*Is your preference for one area of growth only or for more than one?*" ('more than one' presumably meaning up to 5). Option 3 was totally ignored, despite the fact that it got more than double the support for option 1. Where was the opportunity to choose a large number of small sites? No figures were provided for the answers to the quoted question, no mention was made of the responses to this question in the Task Group's discussion, and the many arguments presented by the public in this and later consultations, in favour of a distributed allocation have been consistently ignored. The final decision to go for one large site is easily the least popular.

Section 5.17

"None of the five options considered offered a perfect solution" This is a gross understatement – they were all appalling. However, the need to decide between them could have been avoided if a distributed housing strategy had been chosen. As it was, the decision to go for Area 4 (East of the A12) was made by applying the criteria in a completely biased way, conjuring up non-existent 'advantages' and ignoring Area 4's many disadvantages (see Waldringfield Parish Council's response to the Preferred Options consultation, December 2008). SCDC have failed to provide any response to the points made by Waldringfield Parish Council, in particular our criticisms of the supposed 'advantages' of Area 4. Our conclusion is that these criticisms still stand, the 'advantages' are non-existent, and the choice of Area 4 is therefore fatally flawed.

Section 5.19

“All of these options however were rejected in favour of a Preferred Option dispersed strategy of “organic and evolutionary growth”. No explanation has ever been given for the inconsistency between this decision in Felixstowe and the opposite decision in the IPA. The well argued and valid points supporting distributed housing in Felixstowe (*LDF Core Strategy Preferred Options*, §3.45) apply equally to the IPA.

Section 6

SCDC’s responses to many of the public’s comments are totally inadequate. Many important points have been lost in the summaries, and many of the responses fail to deal with the real issues....

Section 6.03

Felixstowe/Walton and Trimley Villages

Comment 3:

“The A14 is unable to cope now let alone with increased traffic from the new housing”

Response:

“The traffic studies which have been done indicate that the A14 even with the additional lorry traffic which will result from the port expansion will be able to cope with the housing numbers proposed”. Assuming this refers to *Suffolk Coastal District Council Local Development Framework Housing Allocations Proposed Strategy Transport Appraisal, Sept. 2009*, this document is seriously flawed (see comments on Appendix 1). Even if these flaws are ignored, the document says: “It is expected that the impact at the A14/A12 junction will be significant, and therefore a mitigation scheme will be required to ensure this does not have a detrimental impact on the operation of the junction.” (§7.7)

A major bottleneck on the A14 is the Orwell Bridge. This is not considered in the *Transport Appraisal*, but it is in the *EERA Newmarket to Felixstowe Corridor Study*, which says:

“Demand on the Orwell Bridge is forecast to increase in the future. The Highways Agency, in the A14 Gorton to Felixstowe Congestion Study, forecast that the stress level on the Orwell Bridge will increase to 0.90 in 2009 and 0.98 in 2014. The Highways Agency East of England Transport Model indicates that, by 2021, daily traffic volumes may have reached 76,000, representing a stress level in the order of 1.12. In the morning peak period, the model forecasts an eastbound “demand” flow of over 4,400 pcus, compared to an “actual” flow of 3,400. **This suggests that over 30% of the demand in the peak hour will not actually be able to flow through the link because of congestion.**” (§4.18) [our emphasis].

“When the CRF (Congestion Reference Flow) is reached (i.e. a stress level of 1.0), hourly traffic demand is likely to exceed the maximum hourly throughput of the link, with the result that traffic flow breaks down with speeds varying considerably, average speed drops significantly, and the sustainable throughput is reduced and queues are likely to form.” (§4.17)

The problems described above do not take account of the extra traffic due to the proposed 2,000 and 1,000 houses in the IPA and the Felixstowe area respectively, or the possible port expansion.

Ipswich Policy Area – East of A12

Comment 1:

“The numbers of houses currently proposed is too great.”

Response:

“To reduce the numbers would mean not meeting RSS requirements as well as resulting in a development which was little more than an overgrown housing estate”

The numbers could easily be reduced by re-assigning some of the allocation to the rest of the district (where there is a large identified need for affordable housing), thus keeping the total

the same. Dispersal of the allocation over many sites would not result in an 'overgrown housing estate'.

Comment 2:

["1,000 is insufficient to provide a standalone Community"](#)

Response:

No mention is made of the rather telling fact that only one respondent made this comment – David Lock, on behalf of BT, the owners of the land in question. The many comments questioning the need for a new standalone community have been ignored.

SCDC's support for this position is in stark contrast to the arguments previously used to justify a single site of 1,050 houses, which apparently was needed to create a sustainable community. No mention had been made previously that 1,050 would not be enough. No explanation has been given as to why 1,050 houses were considered sufficient to create a sustainable community in 2008 but now 2,000 are needed. Did the planning officers get their sums wrong (by a factor of 2)?

Response:

["A larger allocation provides the basis for a significantly improved range of community facilities"](#)

This is a self-justifying, circular argument: 2,000 houses are needed to justify providing the facilities, but the only reason the facilities are needed is to service the 2,000 houses! According to the RSS, a genuine need only exists for 1,050 houses – if this number were built, and they were dispersed over the IPA or better still throughout the rest of Suffolk Coastal, the need for new facilities and infrastructure would be far less (and the cost to the taxpayer less).

Response:

["The evidence suggests that the benefits do indeed outweigh the disbenefits."](#)

No justification is given for this conclusion. What evidence? What supposed benefits? No evidence of genuine benefits has been provided, but there are many disbenefits:

- Urbanisation of a rural area
- Destruction of local communities
- Impact of additional traffic on the roads
- Damage to environmentally sensitive areas nearby, and the wildlife they protect
- Increase in pollution and greenhouse gases
- And many more....

Comment 3:

["Adverse impact on existing communities at Martlesham, Martlesham Heath and Waldringfield"](#)

Response:

["... but which triggers the need for additional infrastructure, particularly secondary education ..."](#)

Even 2,000 houses are insufficient to trigger the provision of a new secondary school (according to *Future Secondary School Provision Alternative sites Assessment IPA*, ["Demand for one new secondary school would normally be required for 5,000 new homes"](#) (§3.2.3)) Even taking into account the existing shortfall, a new school will not be justified (see comments on Appendix 1).

Response:

["It also offers the opportunity to better mitigate the potential impact of visitors and residents on the neighbouring countryside and estuary ..."](#)

It is perverse and illogical to argue that more houses will have a lesser impact, even with 'mitigation'.

Response:

["The lie of the land in the proposed area, coupled with the fact that much of the land involved either has been or is scheduled to be used for mineral extraction, is such that the degree of the disbenefit from damage to the landscape, loss of agricultural land and the like from the increased size of this allocation is limited, ..."](#)

This ignores the fact that the mineral extraction is a temporary situation, with planning permission conditional on the land being returned to its original state when the extraction has finished. Building in this location actually means the loss of agricultural land, or more accurately lowland heathland, which it was within living memory (pre-1960s for most of it). Lowland heathland is a scarce habitat which should be conserved and re-created: “[In areas that support lowland heathland, there should be a presumption in favour of re-establishing heathland on derelict land or land that has been used for mineral extraction.](#)” (*UK Biodiversity Action Plan*) [our emphasis].

Comment 4:

“[Unacceptable impact on the neighbouring wildlife and countryside](#)”

Response:

“[Development on this scale must be undertaken as part of a comprehensive development which places significant emphasis on mitigating these potential impacts.](#)”

‘Mitigation’ is a word that is grossly overused in this document. ‘Papering over the cracks’ would be a more appropriate phrase. Doing the wrong thing, then insisting that mitigation is put in place to lessen the impact is not a sensible strategy. No amount of ‘mitigation’ will be able to undo the damage created by such an enormous and inappropriate development. This damage will be made far worse by doubling the number of houses. Twice the number of houses means twice the number of people, dogs, cats, cars, boats, etc, as well as twice the amount of noise, light pollution, car exhaust pollution, water consumption, etc., and therefore twice the amount of impact on the neighbouring wildlife and countryside.

The response that the impact on the neighbouring wildlife and countryside can be overcome is contradicted by SCDC’s own Appropriate Assessment: “[Any development is likely to bring additional pressure to any of the sites of European interest, however the area near Martlesham identified as a “preferred option” could have particularly negative impacts upon the Deben Estuary SPA/SSSI](#)” (*SCDC Core Strategy Appropriate Assessment*, Appendix 4)

Comment 5:

“[Unacceptable Impact on the primary and local road network](#)”

Response:

“[However the impact of 2,000 homes as opposed to 1,000 on individual junctions etc when linked to new and improved transport infrastructure is limited but will help to secure the necessary developer funding to secure these upgrades to a good standard](#)”

How can the impact of 2,000 homes as opposed to 1,000 be ‘limited’? 2,000 homes will have roughly double the impact of 1,000 homes: twice the number of car journeys and twice as much traffic congestion. This is confirmed by comparing the figures in the two *Transport Appraisals* (Aug 2008 and Sept 2009): person trips per hour for the total dwelling allocation is 1087 (970 houses) and 2240 (2,000 houses) – **an increase of 106%**. (Aug 2008: Table 8, Car Driver, Total Trips figures: 555 (am) + 532 (pm) = 1087. Sept 2009: Table 3.2, Scenario1, Car Driver, Total Trips figures 1143 (am) + 1097 (pm) = 2240) (see comments on Appendix 1).

In either case, upgrades to road junctions, etc would presumably be proportionate to the increase in traffic. Surely developer funding to ‘secure these upgrades to a good standard’ can be demanded no matter how many houses are proposed. A dispersed housing policy would avoid having to do any major upgrades, because the traffic impact would be much more diluted.

The argument that securing developer funding to pay for changes that are only needed because of the new housing, is (as with the general point about infrastructure) a self-justifying, circular argument. If this new town were not built, the developer funding to widen roads, etc would not be needed.

The *Transport Appraisal* says: “[The combined impact of the allocations to the east of Ipswich and the Market Towns will have a considerable impact on this difficult junction \[the A12/ A1214 Junction\].](#)” (§7.5.2) and: “[the impact on the local road network, in particular the A12, is unavoidable](#)”

and considerable improvement would be required at a number of A12 junctions to preserve existing service levels” (§4.5.1) Both these quotes support Comment 5.

Conclusion:

“Consideration should be given to an alternative housing distribution”

Response:

The response to this comment fails to address the issue; it is simply a repetition of responses to comments 1-6, and suffers from the same failings. An ‘alternative housing distribution’ means distributing the houses over several (or even better, many) small sites, instead of one large site. It doesn’t mean having to find another large site capable of accommodating 2,000 houses, which is the implication of the sentence: “The area has lower negative impacts on landscape quality and public amenity overall than other potential alternatives”

Section 7.01

“Allocations are expressed as minimum figures consistent with the approach of the Regional Spatial Strategy – The East of England Plan”. Although the East of England Plan figures are indeed minima, this only means that SCDC is free to exceed them in the LDF if it wishes. If the LDF figures could be treated as minima, it would make a farce of the whole enterprise of strategic planning – nobody would know even approximately how many houses will actually be built! The figures provided in the LDF are **not minima**, they are the **actual numbers** that SCDC’s strategy requires to be built. There is no justification for specifying the LDF figures as minima, to be exceeded by developers if they so wish.

The comment of GO-East on SP18 is “We suggest that the allocations are expressed as a range rather than a specific number to ensure the policy is sufficiently flexible”, which at least has the merit of specifying the limits to the housing numbers. It also implies that GO-East view the ‘specific number’ as an actual figure, not a minimum, because they see it as being not sufficiently flexible, whereas if it were a minimum, it would be infinitely flexible.

Section 7.02

“The location for such a community remains at Martlesham although the location is specified as to south and east of Adastral Park” This is a much more precisely specified location than in the previous version of the LDF, which says: “The area of search for housing sites will extend in a “half collar” around the employment area at Martlesham Heath, including BT at Adastral Park. Opportunities for sites include within Martlesham village, on the old Felixstowe Road, the sand quarries east of Adastral Park and the farmland north of Waldringfield Road.” (*LDF Core Strategy, Preferred Options*, §3.21) No reason has been given for narrowing the ‘area of search’ to the south and east of Adastral Park. In fact the opposite has happened – the advantage of a wider search area previously given has been removed: “There is also the ability to separate the area into distinct sections, thereby giving the opportunity to phase the development and also **not to rely on one landowner**” (*Future Location Of Strategic Housing Growth In The Ipswich Policy Area*, §4.3) [our emphasis]. There is only one landowner in the location to the ‘south and east of Adastral Park’: BT.

It is therefore difficult to avoid the conclusion that the LDF Core Strategy is being written to dovetail precisely with BT’s planning application, C09/0555. (The new housing number, 2,000, is also exactly the number in the BT planning application). Instead of plan-led development, we now seem to have a BT-led planning strategy!

“Allocations at Key Service Centres to meet local needs and affordable housing provision” This allocation falls far short of meeting the need for affordable housing in rural areas, which is currently running at 2,722 homes per year in Suffolk (*Delivering affordable housing in rural Suffolk, Ian Tippett Babergh’s Strategic Housing Manager, 9 October 2009*).

Section 7.03

“An allocation of 2,000 new homes be made at Martlesham”. There is no justification for doubling the allocation. There is no identified need for the extra 950 houses. All the problems created by a 1,050 house development will be made much worse by a 2,000 house development.

“... integrate the development into the remainder of the Martlesham community, ...” It is difficult to see how this new development will be integrated into the Martlesham community when it is divided from Martlesham Heath by the A12 and several BT office buildings and car parks, and from Old Martlesham by the Martlesham Heath Business and Retail Park.

There seems to be confusion over whether the new community will be integrated or self contained. The quote above suggests the former, whereas “It is of sufficient size to provide a relatively self contained community” (§6.03, IPA Comment 1) and “the opportunity to provide for a more self contained development” (§6.03, IPA Comment 3) suggest the latter. Is it intended to be integrated or self-contained?

Section 7.06

“The target will be 330 new homes overall of which 1 in 3 will be affordable ones”. Why is this target only mentioned for Key Service Centres? It should apply to all the areas: “There is a need for affordable housing across the district” (*LDF Core Strategy, Preferred Options*, §7.06) We wouldn't be so cynical as to suggest that the reason there is no mention of this target for the IPA is that BT don't want to have their profits reduced by having to provide 1 in 3 affordable homes, and that SCDC are acquiescing in this. The target of 1 in 3 affordable homes should be clearly stated as applying to the whole of the district, including the IPA.

Section 8.02

“... the broad strategy that you have already commented, and which has achieved a large measure of agreement ...”. The broad strategy hasn't achieved anything like a 'large measure of agreement'. The only 'large measure of agreement' that has been achieved is that it has been almost universally opposed by local residents in the IPA and Felixstowe.

Appendix 1

Suffolk Coastal District Council Local Development Framework Housing Allocations – Proposed Strategy Transport Appraisal – September 2009

It is admitted that: “... much of the analysis has been qualitative, and partial ...” (§8.7), and that there were many restrictions to the study method:

- no new survey work
- no new transport network modeling
- no consultation
- no iteration or optimization
- no detailed traffic data available
- a large range of uncertainties
- calculations largely based on 2001 census data (i.e. 8 years old) (§1.3)

Yet despite all these problems, “no over-riding concerns have been identified” (§8.7) The *Transport Appraisal* may have failed to identify any over-riding concerns, but that is a failing of the document rather than because there are no causes for concern....

The *Transport Appraisal* misses out several major impacts on the road system:

- the Orwell bridge (see comments on §6.03, Felixstowe/Walton and Trimley Villages Comment 3)
- the A12/Barrack Square roundabout. Why was this omitted? It is the central junction onto the A12 from the proposed site, and is likely to take a large proportion of the traffic.
- the road into Waldringfield. This is often congested. It is single track in places, with no pavements or street lighting. The residents of the proposed new town are very likely to visit the attractions of Waldringfield, which has the only beach on the river Deben between Woodbridge and Felixstowe Ferry, a popular riverside pub, the river itself with its boating

possibilities, and many attractive footpaths along the Deben Estuary mud flats and surrounding countryside. The road cannot be widened, so it is inevitable that congestion will increase further with 4,800 people living 1.5 km up the road.

- the use of Newbourne Road (from the Waldringfield Heath crossroads to the Red Lion at Martlesham) as a rat-run to avoid congestion on the A12. This is already happening, but with the extra traffic and the introduction of traffic lights on the A12 (with consequent delays), it will inevitably get much worse.

There doesn't seem to be anywhere in the *Transport Appraisal* that says what assumption is being made about the percentage of working householders who will have jobs at Adastral Park. (This is important because the lower this percentage is, the more commuting will occur). It does say:

“**Scenario 1, which accommodates 2,000 houses on Site 4, directly adjacent to a key employment area, would put employment opportunities and homes together and make travel to work by non car means a more realistic option.**” (§4.5.1). Also: “**the sites proximity to Adastral Park allowing more trips to work to be made by other modes**” (§3.2). Both of these statements ignore the evidence...

The evidence strongly suggests that the people who will live in the houses will be a completely different group from those employed in the area. Currently, only 3% of the employees at Adastral Park live within 1 mile of their work (according to the *BT Planning Application C09/0555, Travel Plan*, §5.11), and, since this is not due to a shortage of housing in the area, this percentage is unlikely to increase significantly with the new housing. It is therefore likely that at least 97% of the working residents of the new housing estate will work further afield. Adastral Park is a long way from the major sources of employment in Ipswich Town Centre and Ransomes Europark, with poor public transport links to the former and none to the latter. Trends in home working will make it even more likely that the future employees at Adastral Park will not live nearby.

The 5 scenarios used in the Updated Transport Appraisal do not make sense. All 5 scenarios consider the impact of 2,000 houses in the IPA (Table 2.3). So there is no straightforward way to answer the question “*what is the impact of 2,000 houses at Adastral Park, compared with 1,050?*” Scenarios 2-5 are totally unrealistic – SCDC’s argument for 2,000 houses is that they all need to be in the same place (to “**provide the basis for a significantly improved range of community facilities**”). If 1,050 are located at Adastral Park what possible reason would there be to add an extra 950 to one of the other sites? These scenarios (2-5) are not mentioned anywhere else in the LDF documents, or in any of the other evidence documents.

Estimated peak hour person trip generation for proposed allocations East of Ipswich give a minimum of 2240 trips per day (this assumes the rush hour peaks last an hour each, and there is no extra traffic during the rest of the day, so it is obviously an underestimate). This is an increase of 106% compared with the corresponding figure for 970 houses (see table below) – more than double. (Why was 970 used rather than the actual housing proposal of 1,050?)

Person Trip Generation for Site 4 (East of Ipswich) (person trips per hour for the total dwelling allocation)

	AM	PM	Total
970 houses in Site 4 (Aug 2008, Table 8)	555	532	1087
2,000 houses in Site 4 (Sept 2009, Table 3.2, Scenario 1)	1143	1097	2240

Nowhere in this document is road safety mentioned. The important question: “*how will the increase in housing numbers affect the frequency and seriousness of road accidents?*” is not asked, let alone answered.

Future Secondary School Provision: Alternative Sites Assessment Ipswich Policy Area

“Demand for one new secondary school would normally be required for 5,000 new homes. However, given existing shortfalls in the area, this figure has been discounted by 1,500 homes. In addition, the potential development of Adastral Park would lead to approximately 2,000 new

homes.” (§3.2.3) How is the figure of 1,500 for existing shortfalls arrived at? It certainly does not agree with the figures given in §3.2.2:

The capacity of Kesgrave High School is 1,756 and the current school role is 1,777 - a capacity shortfall of 21. This is set to rise by over 100 pupils by 2012/13, giving a projected shortfall of 121. The capacity of Farlingaye High School is 1,839 and the current school role is 1,876 - a capacity shortfall of 37. This is set to fall by approximately 100 pupils by 2012/13, giving a projected over-capacity of 63. There is therefore a combined shortfall of $121 - 63 = 58$ pupils, or 580 homes (assuming 1,000 homes generate 100 secondary pupils). This is very different from a shortfall of 1,500 homes.

What is the basis for the claim that 5,000 homes are required to justify building a secondary school? At the ratio assumed above, this would generate 500 pupils, which is very small for a secondary school. A more normal size is 1,200 pupils, requiring 12,000 houses to justify it (we are not suggesting 12,000 houses are built!)

Even if the shortfall is 1,500 homes, added to 2,000 new homes this would still only give 3,500 homes, 1,500 less than the 5,000 the report states are needed to justify a new secondary school. And even if 2,000 houses + the shortfall were sufficient for a new school, the full 2,000 will not be provided until 2025, so we will have 15 years before the new school is justified. Where will the secondary age pupils living in the proposed new town be educated in the meantime?

“Development on any of the alternative sites could potentially lead to an adverse impact on the landscape and loss of biodiversity.” (§4.2.5) We strongly agree with this statement. The obvious conclusion is that they should not be developed.

“Environmental and other constraints at Adastral Park and Site 6 are considered to be surmountable with appropriate mitigation measures, including landscaping.” (4.2.9) See our earlier comments on mitigation. Doing the wrong thing, then insisting that mitigation is put in place to lessen the impact is not a sensible strategy.

“there is a risk that the Adastral Park development will create a community which is considered separate from the existing neighbourhoods of Martlesham and Martlesham Heath” (§4.2.32) There certainly is this risk, which is another reason for not developing it.

Sustainability Appraisal

“The sustainability of the new policy is higher than the previous version ... Concentrating development in the IPA is considered a more sustainable strategy” (§2.2) 3 reasons are given to justify this conclusion:

- “i) The employment offer in Ipswich is larger and more diverse than elsewhere in the District...” But the proposed site at Adastral Park is the furthest of the original 5 options from Ipswich, and has poor public transport services to the main centres of employment in Ipswich Town Centre and Ransomes Europark.
- “ii) There is the opportunity to create sustainable settlement(s) with distinctive identity with smaller readily distinguishable villages, neighbourhoods and communities within the larger area.” There is no reason to believe (and no evidence supplied) that the one large settlement proposed will be any more sustainable than several smaller settlements. Why does this argument not hold in Felixstowe, where the choice was to disperse the housing? How do the current proposals promote “smaller readily distinguishable villages, neighbourhoods and communities within the larger area”? We already have these - the building of a 2,000 house new town will overwhelm several of them, making them less ‘readily distinguishable’.
- “iii) Public transport provision and foot and cycle paths can be upgraded and promoted to minimise the need to use private motor vehicles with the major service centre of Ipswich nearby.” This could and should be done anyway. It is unlikely that many people will switch from driving to cycling into Ipswich town centre, which is 7 miles away. Even if the promotion of public transport and cycling is successful, there will still be many more car journeys resulting from a 2,000 house development than a 1,050 one (more than double in fact - see comments on Transport Appraisal).

“The new policy is marginally less sustainable due to additions of land abutting Adastral Park being identified for development. This is greenfield land that includes current archaeological and biodiversity sites ...” (§2.4) This is certainly true (although we would disagree with the use of the word ‘marginally’ – ‘significantly’ would be more accurate). It is also in conflict with the general conclusion in §2.2.

“There is the additional concern about access to the countryside and proximity to the Deben SPA. Mitigation will need to take place ...” (§2.4) Once again the panacea of ‘mitigation’ is being used to try to lessen the harm done by a misguided policy. It is unlikely to be successful, because people cannot be prevented from visiting attractive but environmentally sensitive sites such as the Deben Estuary. Usually their remoteness acts as a deterrent for many people, but with nearly 5,000 people living just 1.5km away, that deterrent is no longer there.

Appropriate Assessment

“Consultation with the public at draft stage was not considered necessary bearing in mind the conclusions of the draft assessment and the opportunity for public consultation at the Submission stage of the Core Strategy” (§4.1.3) The Submission stage of the LDF Core Strategy is too late for any comments on the contents of the document. Only comments on the soundness and legality of the LDF are allowed at that stage.

The document seems to be confused and full of self-contradictions. For example, there are several statements that indicate the extra housing will have an adverse impact on the Deben Estuary...

“Natural England commented on the similar policy earlier numbered as SP3 that ‘Any development is likely to bring additional pressure to any of the sites of European interest, however the area near Martlesham identified as a “preferred option” could have particularly negative impacts upon the Deben Estuary SPA/SSSI’.” (§4.7)

“An allocation of 2000 houses at Martlesham could potentially cause problems to the Deben Estuary, from increased visitor use causing significant disturbance to SPA birds; trampling of water-edge habitat in Martlesham Creek containing a rare snail might also occur ...” (§6.2.31)

“It is therefore possible that visitor recreation activity would substantially increase on the foreshore of Deben Estuary SPA, bringing in high levels of disturbance to what is currently little disturbed and a ‘refuge’ area for SPA qualifying birds.” (§6.2.32)

“It therefore cannot be ascertained that an allocation of 2000 new dwellings at Martlesham will have no adverse affect upon the integrity of Deben Estuary SPA near Martlesham” (§6.2.34)

However, despite these worrying comments, the opposite conclusion is reached...

“it is unlikely that visitor recreation activity would substantially increase on the foreshore of Deben Estuary SPA at Martlesham, so there is expected to be no new high levels of disturbance” (§6.2.35)

This circle is squared by invoking ‘mitigation’, which seems to be little more than the hope that visitors will be deterred by the fact that they live more than 1km away and by the presence of other greenspaces (it is not clear where these will be)....

“with the proposed mitigation, Policy SP2 and related housing policies will have no adverse effect upon the integrity of any European site” (§7.3.1)

“Mitigation ... is based on providing alternative recreational choices for residents” (§7.2.7)

“Provided that strategic housing proposals for development at Martlesham are greater than 1km from the Deben estuary, and improvements to accessibility of natural greenspace are made, it is unlikely that visitor recreation activity would substantially increase on the foreshore of the Deben Estuary SPA at Martlesham” (§7.2.4)

This is totally unrealistic. The new housing will be 1.5km from the river Deben at Waldringfield – closer than any other likely greenspace, and easily within travelling distance, whether by car, bicycle or on foot. There is no possibility that the suggested ‘greenspace’ will contain a large attractive body of water, suitable for water-based activities and leisure pursuits, remotely comparable to the Deben Estuary.

Another implausible reason for believing that there won’t be many extra visitors is the lack of a public car park at Waldringfield...

“The car park at the Deben Estuary at Waldringfield is privately operated for users of the pub and sailing club, and is not available as a starting point for estuary-side walks. Given this lack of available parking, it is possible to ascertain that the integrity of the Deben Estuary at Waldringfield will not be affected by the housing allocations at Martlesham either alone or in combination with housing provisions elsewhere.” (§6.2.37)

It is not ‘possible to ascertain’ anything of the kind. Some people might decide to use the pub’s car park and have a drink after their walk. Others might just use the car park and avoid the pub. Others might park somewhere else in Waldringfield, e.g. by the roadside, which happens all too often. Yet others might cycle or walk to Waldringfield. All of which will inevitably lead to “increased visitor use causing significant disturbance to SPA birds” (§6.2.31).

However, the document is confused even about the simple fact of whether or not there is a public car park at Waldringfield...

“with the nearest public car parks being in Woodbridge to the north and Waldringfield to the south.” (§6.2.26)

Nowhere in this document is the impact of boating considered. It is highly likely that with around 5,000 people living just 1.5km up the road, the number of people using the river for water sports, power boating, sailing, fishing and canoeing will increase dramatically. It is acknowledged that boats are a problem: “On one estuarine site, disturbance to birds from boats was thought to be the biggest problem” (§5.5.6). However, no attempt is made to discover the extent of the problem, and by how much it will increase due to the new housing.

Yours sincerely



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Parish Clerk to Waldringfield Parish Council