

WALDRINGFIELD PARISH COUNCIL

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BY EMAIL

Mr P J Ridley
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Dear Mr Ridley

Detailed Comments on Planning Application C09/0555 (Revised Redevelopment of Adastral Park, Revision dated 28/01/10) by Waldringfield Parish Council

Summary

Waldringfield Parish Council's objections to the Revised Planning Application C09/0555 are not altered by the latest revisions and additional information, in fact the revisions emphasise the inappropriateness of the development and the inadequacy of the proposed 'mitigation'.

The assessment of the problems and the mitigation proposed in the *Habitat Regulations Assessment and SSSI Mitigation Strategy* is woefully inadequate, but even with far greater mitigation measures (which would in fact be impractical) the impact on the environmentally sensitive sites near the development would still be extremely damaging.

The conclusion that: "... provided the mitigation is secured, then the development would have no adverse impact on the integrity of the Deben Estuary SPA/RAMSAR and Newbourn Springs SSSI" (*Environmental Assessment Regulation 19 Statement, §4.16*) is not supported by the evidence and is at odds with a good deal of it. Moreover, it is based on flawed data and illogical arguments. Details of these flaws are provided below.

None of Waldringfield Parish Council's comments on the *Transport Assessment (April 2009)* have been addressed, and Sensitivity Test 2, which is the most realistic basis for estimating future traffic flows, does not make sense (see detailed arguments below).

The amount of land proposed for the secondary school falls far short of what is actually needed (see detailed arguments below).

Environmental Assessment Regulation 19 Statement

Section 3.2, Table 3.1

"No significant change from April 2009; chapter 6.0 in the April 2009 ES therefore remains valid."

The employment situation has clearly moved on since April 2009. The ES states: "*Adastral Park is an employment site for 4,000 people, of whom approximately 3,600 work at BT*" (ES, §6.16) At the very least, BT should update this statement with current information of the number of people working at the site, preferably broken down by employer and job type, clearly indicating for example, how many of the employees are permanent, full time BT employees. There is strong evidence that a large proportion of the employees work for overseas sub-contractors, and will return to their home countries within a relatively short time, particularly when the legacy support systems that BT is rationalising are no longer needed.

"The additional number of employees on site could reach up to 2,500 ... the development would result in the creation and safeguarding of 4,857 jobs" (ES, §6.41). These figures should be replaced with up-to-date estimates, based on the Jan. 2010 situation. However, even without any updating the figures do not add up. The current workforce is, apparently, 4,000. Adding 2,500 additional employees gives 6,500. So where does the figure of 4,857 come from? Does it mean that in fact the number of new jobs will only be 857?

Also, the phrase *'could reach up to'* is very suspicious. The question isn't what figure *could be* reached (given, for example, a miraculous upturn in the economy) but what figure is *likely to be* reached.

The word *'safeguarding'* is also interesting. Does it mean that BT will guarantee that 4,857 jobs will really be safeguarded against all eventualities? This seems very unlikely. If BT decide that the work done at Adastral Park is no longer needed, or can be done cheaper elsewhere, will they really stick to this supposed *'safeguard'*? If BT's share price collapses and they are taken over by a (possibly foreign) company with R&D facilities of their own, will the new owners uphold this *'safeguard'*? These important issues should be considered in the light of the most up to date economic information and financial state of BT.

Section 4.9 (and Appendix 4.1 §11.3)

"A warden would be employed to promote responsible access and compile a visitor management plan to minimise impacts on the Ipswich Heaths and the Deben Estuary."

It is difficult to see how a single warden could mitigate the impact of nearly 5,000 people living just 1.5km away from the Deben Estuary SPA/Ramsar/SSSI, and 0.7 km and 1 km from the Ipswich Heath and Newbourne Springs SSSIs respectively. One warden couldn't possibly cover all three sites adequately. Features such as signage already exist, and although there is room for improvement, better signage is unlikely to make any significant difference to the impact of visitors to these sites.

"zoning of activities and provision of enclosures to prevent access where there are important concentrations of birds"

This will have a serious detrimental effect on the amenity value of these beautiful places. It is yet another example of how this development will ruin the character of area. It would be totally impractical to build fences either side of footpaths running through areas of mudflats and saltmarsh (unless the proposal is to ban public access altogether, which would probably be illegal, contrary to several of SCDC's policies and damaging to tourism).

"installing a barrier at Waldringfield Sailing Club car park to prevent unauthorised use of this area by non-members wishing to use it in order to access the estuary"

There is already a barrier at the Sailing Club car park. This *'mitigation measure'* will have no effect whatsoever.

"Should monitoring of the Deben Estuary SPA/SSSI attributes show that the above mitigation measures are not succeeding ... then further mitigation measures would be required."

No indication is given as to what these *'further mitigation measures'* would be. It is difficult to think of anything that would not be unduly restrictive and detrimental to the amenity value of the Deben Estuary. This is because the root cause of the problem is the proximity of so many people, and no amount of mitigation will change that or significantly reduce their impact.

The reason the Deben Estuary SPA/Ramsar/SSSI is attractive to migrating birds is its remoteness from people and their activities. Take away that remoteness by building a new town housing nearly 5,000 people just 1.5km away, and you destroy the very reason why so many birds are attracted to the estuary.

Section 4.13, Table 4.1

"As this is an outline planning application, the details of the location and extent of the heathland would be included within the detailed planning application."

The locations of other types of land use (e.g. woodland, perimeter planting, open space) are provided, along with their total areas, surely the rough location and extent of the heathland could also be provided. Unless, of course, the extent of heathland is so small that it wouldn't

show up on the plan! If the intention is to locate the heathland within the other land use types, such as perimeter planting, the resulting heathland would be insignificant in size and fragmented, and would not provide a proper habitat for heathland flora and fauna. This is hardly an adequate response to Natural England's objection.

Section 4.14, Table 1.1

"this worse case scenario [a 10% increase in visitors] is unlikely to [be] exceeded regardless of whether 1800 people are based at the site or 4800".

This statement does not make sense. Unfortunately, the current number of visitors per day isn't provided, however we can deduce it from the data that is given....

In *Appendix 4.1, §5.3.1* it says: *"... an assumption has been made that up to 100 people may visit every day (i.e. approximately 6% of 1,800 new residents)."* For this to be below the worst case scenario of a 10% increase, the current number of visitors per day would have to be between 91 and 100.

If 6% of 4,800 were used instead (of 6% of 1,800), the number of visitors per day would be 288, an increase of between 216% and 188% over the current numbers. So the statement that a 10% increase would not be exceeded *regardless of whether 1800 people are based at the site or 4800* is clearly nonsense.

"The intertidal area at the mouth of Martlesham Creek where avocets occasionally feed is soft mud and inaccessible to mountain bikers and dogs".

This misses the point. Dogs (and people) disturb birds even when the birds are feeding on soft mud – it is not necessary for the dogs to run across the mud to cause bird disturbance. Where birds are frequently disturbed, and in particular where activity levels are high, the bird numbers decrease. (see *Disturbance to Water birds Wintering in the Stour-Orwell Estuaries SPA, Report from Wild side Ecology to the Suffolk Coast and Heaths Unit* for evidence supporting these points.)

The response given here (Table 1.1) is completely at odds with *Appendix 4.1, §5.4.1*, which says: *"it is not possible to rule this scenario [dog walkers at Hemley] out completely and conclude that there would be no impact on the wintering birds"* and *"this impact [mountain bikers] on the birds cannot be ruled out with certainty particularly around Hemley where avocets roost"*.

"The nearest roosting area for this species [avocet] is to the east of Hemley approximately 4.5 km from the proposed development and 2.5 km from the nearest car park"

Almost all visitors to Hemley park their cars by the road in Hemley. Presumably the 'nearest car park' referred to is at Waldringfield, but the river wall between Waldringfield and Hemley is breached, so there is no continuous footpath along the river between the two places, making this argument irrelevant.

"Measures outlined in section 11 are considered to adequately mitigate for these impacts"

See comments on mitigation below.

"Impacts on the Newbourne Springs SSSI were discussed via a telephone call week with Kate Jackson from Natural England (Officer responsible for this SSSI) who stated that the woodland is unlikely to be affected by an increase in dog walkers as the woodland is currently difficult to penetrate by visitors or dogs due to the dense understorey"

The Suffolk Wildlife Trust manages Newbourne Springs SSSI. In the LDF Appropriate Assessment consultation, Mick Wright (SWT Site Manager for Newbourne Springs) cited as harmful impacts: *"dogs off leads and not under control"*, *"nature reserves, sensitive sites such as reed beds, mudflats, saltmarsh used as recreational areas especially by dogs"*, *"the sheer volume of people at some locations is impacting on wildlife and the fabric of the countryside"*. Newbourne Springs contains many habitats, most of which do not have a dense understorey. It has areas of marsh, reed bed, fen, ponds, alder carr, heathland and grazing meadows, as well as various types of woodland. The SWT website for Newbourne Springs says: *"This site is an SSSI because of the sheer variety of habitats and associated wildlife"*. The idea that dogs will not be a problem because of the dense understorey is ludicrous.

Predation by cats is not considered anywhere.

"The Thames Basin Heaths is designated as a SPA primarily for its breeding birds whose eggs and chicks are susceptible to dog predation. Developmental impacts are therefore higher when compared with the Deben Estuary SPA which is designated for its wintering Avocets that feed on the mudflat edge away from footpaths. Other wintering birds along the estuary in are also unlikely to be impacted in the same way as heathland birds."

This does not address the complaint that it claims to address, i.e. that the calculation used to determine Natural Greenspace was incorrect. NE actually says *"The HRA used the Thames Basin Heaths example to derive an area of natural greenspace requirement of 28.8ha based on a population of 1800 people ... we view this to be a considerable underestimate of the numbers of people likely to be living in the proposed development."* (letter from Pat Williams (NE) to Paul Coffey, 26/1/10). If BT's argument is that less alternative greenspace is needed than for the Thames Basin example, because of differences in the habitats, then they should provide the number of hectares per 1,000 people they think would be appropriate, and use this with the realistic population of 4,600 to calculate the amount of alternative greenspace needed. We do not believe this would be much different (say a reduction from 16ha to 14ha per 1,000 people), because, as has already been argued, dog disturbance is a serious problem for wading birds on mudflats. It may be a different problem to heathlands (disturbance of feeding and roosting as opposed to nesting), but it is just as serious.

Section 4.16 and Appendix 4.1, §11.4

"It is concluded that provided the mitigation is secured, then the development would have no adverse impact on the integrity of the Deben Estuary SPA/RAMSAR and Newbourn Springs SSSI, and a low impact on the Deben Estuary SSSI and Ipswich Heaths SSSI."

This conclusion is not supported by the evidence and is at odds with a good deal of it. Moreover, it is based on flawed data (e.g. 1,800 new residents, which should be 4,600; the parking situation at Hemley; the barrier at Waldringfield Sailing club car park; the claim that the dense understorey will deter dogs in Newbourne Springs, the assumption that there will be no increase in motor boats on the river...)

The mitigation proposed is totally inadequate, but even with far greater mitigation measures (which would in fact be impractical) the impact on these sites would still be extremely damaging.

Appendix 4.1, §4.4

"It suggests there will be a net increase of 0.9 people per new house, which reflects the ageing population and an increase in second homes/holiday homes. Therefore it is estimated that the proposed development would result in approximately 1800 people living in the residential area"

The idea that this development would have a population density of only 0.9 people per house is ridiculous. Does it mean that most of the owners of the houses will be single pensioners and second home owners? BT uses the much more plausible figure of 4,600 elsewhere: *"With up to 2,000 dwellings on completion and taking an average household size of 2.3 people per household (the average for Suffolk Coastal district, 2001 census) the future population would be in the region of 4,600 people..."* (Environmental Statement, April 2009, §6.56).

Appendix 4.1, §5.3.1

"... an assumption has been made that up to 100 people may visit every day (i.e. approximately 6% of 1,800 new residents)."

Given that the number of residents is likely to be around 4,600 (BT's own figure, see above), why is 1,800 being used? 6% of 4,600 is 276, or nearly 3 times the number that has been used. This mistake is repeated in §5.4.2 *"we have assumed that 2000 additional homes (1800 people – see section 5.3.1) would result in an additional 100 people using the paths outlined in Figure 2 everyday and an additional 10 people using small craft along the water's edge everyday"*. These figures should be 276 and 27 respectively (or 288 and 29 if a population of 4,800 is used).

Appendix 4.1, §5.3.2

"From talking to the bar manager of the Maybush, their car park is currently at capacity during both the winter and summer". This gives the impression that the Maybush car park is full all the time, which is far from true. Its purpose is to try to make the case that extra visitors will be deterred by the lack of parking, which is also untrue. The manager of the Maybush has added further clarification; *"... 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"* (email to Chairman, Waldringfield PC).

Appendix 4.1, §5.3.2 and Fig. 3

No mention is made of the Church Field car park at Waldringfield, which is about 0.5km from the river and will be impacted by an increase in visitors.

Appendix 4.1, §5.4.1

"The nearest roosting area for this species [avocet] is to the east of Hemley approximately 4.5 km from the proposed development and 2.5 km from the nearest car park (3.5 km along roads/footpaths). Although this distance is likely to preclude the majority of dog walkers from the proposed development at Adastral Park visiting Deben Estuary ..."

As explained above, the car park at Waldringfield is irrelevant, as there is no continuous footpath along the river between Waldringfield and Hemley. Dog walkers will drive to Hemley (4.5km is not a long distance to travel by car), park their cars by the road, and walk their dogs by the river, where avocets are roosting. Therefore the conclusion that *"... this distance is likely to preclude the majority of dog walkers from the proposed development at Adastral Park visiting ..."* is invalid.

"Motor boats are actively discouraged from using the estuary and no increase is anticipated."

It seems highly unlikely that there will be no increase in the number of motor boats due to the extra 4,600 people living 1.5km away. It is accepted that there will be an increase in users of small craft (see below), why not motor boats?

"Small craft are potentially highly disturbing to feeding and roosting avocet", "... even a small increase in small craft could result in disruption to feeding patterns".

These statements are undoubtedly true. It is estimated that there will be an extra 27 people using small craft along the water's edge everyday (figure adjusted from 10, as explained above). Yet nowhere is this important impact seriously considered – it is not even mentioned in the summary response (§4.14, Table 1.1).

Appendix 4.1, §11.1

*"The Thames Basin Heaths have an Alternative Greenspace (i.e. Sustainable Accessible Natural Greenspace (SANG)) requirement of 16ha per 1,000 people where a SPA is within 2km of a proposed development site. As the projected population increase for the proposed development is **1,800 people**, this equates to 28.8 ha. At present 25.5 ha is proposed as public open space within the proposed development (see section 4.3 of this report) and a further 3.3 ha would therefore be needed in order to adhere to this calculation."* (our emphasis).

The projected population of the proposed development is **not** 1,800 people; it is 4,600 people (BT's own figure, as pointed out above). Therefore, on the basis of 16ha per 1,000 people, 73.6ha of SANG is needed.

The calculation quoted assumes 25.5ha of open space, but this ignores the fact that 3.2ha of the proposed 25.5ha is in fact sports pitches, which hardly qualify as alternative greenspace for dog walkers. The figure should therefore be $25.5 - 3.2 = 22.3$ ha of SANG already proposed.

Therefore a further $73.6 - 22.3 = 51.5$ ha of public open space is needed, on top of what is already proposed. (Even using BT's flawed projected population of 1,800, the figure is $28.8 - 22.3 = 6.5$ ha). No such increase in public open space is mentioned in any of the revised documents, so the conclusion must be that the provision of Alternative Greenspace as mitigation is totally inadequate, and the conclusion in §11.4 is fatally flawed.

"Developmental impacts on heathland SPAs are higher when compared with Estuarine SPAs which are designated for wintering Avocets that feed on the mudflat edge. Other species of wintering birds along the estuary are also unlikely to be impacted in the same way as heathland birds"

However, avocets and other wintering birds are still affected: *"it is not possible ... conclude that there would be no impact on the wintering birds"* (Appendix 4.1, §5.4.1). Also, this statement ignores the Ipswich Heaths SSSI, which is 0.7km from the development site, and is directly relevant: *"The Thames Basin Heath study (English Nature, 2006) contains guidelines on the qualities necessary for such spaces in a heathland context. Some are transferable to the Deben Estuary/Ipswich Heaths situation"*.

"It is concluded that provided the mitigation set out in the Habitat Regulation Assessment and SSSI Mitigation Strategy given as Appendix 4.1, and summarised in Section 4.0 of this report, is secured, then the proposed development at Adastral Park would have no residual adverse impact on the integrity of the Deben Estuary SPA/RAMSAR and Newbourne Springs SSSI, and a low impact on the Deben Estuary SSSI and Ipswich Heaths SSSI."

This conclusion is not supported by the information provided, and is fatally undermined by the points raised in this consultation response.

Transport Assessment Addendum

"Within this report, the Highway Impact and Mitigation Section, which formed Section 7 of the April 2009 Transport Assessment, is updated as Section 2 of this report".

Section 7 of the April 2009 Transport Assessment consisted of 147 sub-sections and 65 pages. Section 2 of the Addendum contains 52 sub-sections and 15 pages. Clearly the latter does not replace the former in its entirety, but the section numbering does not correspond, so it is not clear which bits of section 7 are being replaced and which are not. For example, sections 141 to 143 (Impacts on Martlesham, Waldringfield and Newbourne) do not appear in the Addendum – have they been dropped or are they still part of the Transport Assessment?

None of Waldringfield Parish Council's comments on the *Transport Assessment (April 2009)* have been addressed. For example, the omission of any assessment of the traffic impact on the road into Waldringfield still remains. There is still no mention made of the impact of the development on the emergency services, or on the Orwell Bridge.

Section 2.3

"2018 Sensitivity Test 2 – with all development plus a 1,000 pupil secondary school on site."

It is not clear if this also includes Sensitivity Test 1 (*8% shift away from car driver trips for commuters (instead of 16%)*) or is instead of it. Given that most of the figures and charts show very little difference between these two, it would appear that the latter is the case. If so, then this is surely unrealistic, and tells us virtually nothing about the impact of having a 1,000 place secondary school on the site. The reason for Sensitivity Test 1 is that a 16% shift away from car driving was deemed unreasonably optimistic, and there is no reason why this logic shouldn't be applied to the situation with the school. If the reason for not using this is that commuter trips aren't school trips, the distinction only makes a difference to the PM peak, when the commuter rush hour is later than school closing time. In the AM peak they coincide.

Queue Analyses (§2.13 to §2.36)

Many of these tables show large increases in queue lengths as a result of the development, even with junction improvements. These are consistently dismissed by claiming that they are 'slight' and 'considered acceptable' (this is in contrast to cases where there are reductions - these are invariably described as 'significant'). For example, using the figures for queue lengths for the 2018 base and Sensitivity Test 2:

§2.13: A14 eastbound slip: 1→19 (*"This queue causes no concern"*)
A12 southbound: 31→21 (*"significantly reduced"*)

§2.18: Foxhall Rd: 7→17 (*"Queues on Foxhall Road are increased slightly, but within acceptable limits"*)

A12 southbound: 35→21 ("*significantly reduced*")

§2.21: A12 northbound: 4→32 ("*Queues have increased ... but as stated above nearly all traffic makes it through the junction within one cycle time.*")

§2.23: A12 northbound: 5→34 ("*this is considered acceptable*")

§2.29: Anson Rd eastbound: 1→16 ("*this queue is considered acceptable*")

§2.36: Barrack Square southbound: 0→8 ("*do show a slight increase*")

This distortion of the evidence is an attempt to give the impression that the development plus junction improvements will not adversely affect traffic flows, but this is far from being the case.

Design and Access Statement Supplement

Section 1 (Revised Indicative Master Plan & Indicative Density and Capacity)

"4 hectares of the total Mixed Use area is reserved for primary and secondary education"

This 4ha is divided between 2ha for the primary school and 2 for the secondary school. The SCDC Future Secondary School Provision, Alternative Sites Assessment, §3.2.4 says "*Site size requirements, based upon Building Bulletin 98, require a **minimum site of 8 ha** to accommodate a new 11-18 secondary school with capacity for 1,050 pupils. This area includes space for playing fields*" (our emphasis). Clearly 2ha is totally inadequate. It is not clear if the proposed sports pitches, which are approximately 250m away, would belong to the school (presumably not as they are in the public park). Maybe the school would have rights to use them at certain times, but this would undoubtedly cause other problems, such as child security. However, even if we include the 3.2ha of sports pitches (*Design and Access Statement, §4.3*), 5.2ha is only 65% of the required 8ha.

It appears that no parking space has been allocated for staff, school vehicles (to cater for trips out etc), maintenance and delivery vehicles, and parents to drop off their children.

Section 5 (Revised Indicative Phasing)

It is far from clear that the alternative greenspace would be in place before the new residents arrive (even if the required amount were provided). With Option 1 the open space is being provided in Phase 1, alongside 650 houses (1,495 people, based on 2.3 people per house). With Option 2, some of the Open Space (Central Park, phase 3) will not be provided until the end of development (Phase 5), i.e. when all 4,600 people will be resident. Even if we accept that the Open Space will provide an effective alternative greenspace to the SPAs and SSSIs in the area (which we don't), the damage to sensitive habitats and wildlife that could be done before the Open space is provided would be serious and irreversible.

No explanation is given of the phasing options shown in the plans BTP012-021-J and BTP-012-063-B. It is stated that these supersede the phasing strategy presented in the *Design and Access Statement (April 2009)*, but the latter contains 3 pages of explanatory text and 10 plans.

Please acknowledge receipt of this letter.

Yours sincerely,



Jean Potter (Mrs)
Parish Clerk to Waldringfield Parish Council