

Detailed Comments on Planning Application C08/1725 (Redevelopment of Adastral Park) by Waldringfield Parish Council

Planning Statement

Section 3.6

"the LDF production ... will not be completed until 2010 at the earliest. BT cannot wait until 2010 before submitting this application. It must address market demands and its own operational requirements now." Market demands and BT's own operational requirements will not be addressed by building houses. It is understandable that BT would want to progress the modernisation of the facilities at Adastral Park (including the University and hotel) in advance of the completion of the LDF, but there is no reason why this cannot be separated from the proposals for housing developments on the adjoining land. The latter could then wait until the LDF was completed. It would then be clear exactly what housing policies the application was being tested against, instead of making the assumption that the present LDF draft preferred options will actually be agreed. In short, the application is premature.

Section 3.10

"All concerns and issues that have been identified have been examined, and where appropriate changes have been made". The concerns of the local community (particularly at Waldringfield) have been completely ignored – see comments on the Statement of Community Engagement.

Section 3.12

"... uncertainty created by Local Government review that may prejudice the LDF programme in particular and decision making in general ..." "BT believes that SCDC are best placed to determine this application" This is pure conjecture. There is no reason to suppose that decision making will be prejudiced, or that whoever determines BT's application post Local Government restructuring will be any more or less qualified/competent than the current planning officers at SCDC (they may even be the same people).

Sections 3.15 & 3.24

"... funds need to be protected for R&D and cannot easily be diverted into property renewal" Why not? Is it not possible for BT to decide how its funds are best used? If property renewal is needed to facilitate R&D work, then surely the funds should be secured from the profits BT makes from providing telecoms services (which in turn were made possible by earlier R&D work). BT's 2007/8 budget for building works and land costs was £1,209m (BT Group plc Annual Report & Form 20-F, p111). If it was possible to provide this without selling off land for housing, why is it not possible to do the same for the Adastral Park redevelopment?

BT also says: "We expect that future capital expenditure will be funded from net cash inflows from operating activities, and, if required, by external financing" (BT Group plc Annual Report & Form 20-F, p53). Therefore BT should fund the improvements to Adastral Park from operating activities, as stated in their Annual report, not from a windfall from the sale of land.

Over the years there have been many modernisations to the facilities at Adastral Park, and these were funded out of operating profits, as one would expect. BT have not provided any financial evidence that the similar modernisations proposed in this application could not also be funded out of operating profits. They simply expect the public to unquestioningly accept their unsupported and implausible assertion that it cannot be done. BT's current financial difficulties are irrelevant – this application was submitted well before the present economic crisis, and the building costs for the modernisation will be spread over many years (up to 2020 for the Adastral Park redevelopment, according to the timeline in 'Martlesham Made for Innovation')

"This [refurbishment and redevelopment of the buildings at Adastral Park] requires an injection of new capital which could come through land sales for residential development".

"...sale of land for these new homes will fund the redevelopment of Adastral Park"

The money BT will make from the land sale is effectively a windfall, gained at the taxpayer's expense. When BT was privatised, this land would have been valued at agricultural prices (if it was valued at

all!) So what the taxpayer received for it was a minute fraction of what BT will receive once it has been re-designated as development land. BT has done nothing to earn this windfall, and it should not be used to pay for improvements to BT's facilities, or as part of the latter's cost justification.

Section 3.21

"... people have a greater opportunity ... to choose to live very near to work ..." They might have the opportunity but will they take it? The evidence from the current situation clearly indicates they will not. Out of the current workforce of 4,000 only 205 (~5%) live nearby, in postcode IP5 3 (Transport Assessment, §6.7), and only 3% live within 1 mile of Adastral Park (Travel Plan, §4.11). This figure will probably decrease as more of BT's employees take advantage of BT's policy of encouraging home working, enabling them to live in towns such as Ipswich or Felixstowe, or the many attractive rural villages in Suffolk. 53% of Adastral Park employees currently work from home (Travel Plan, §4.43), and BT says "... there is scope for a greater number of staff to work from home on a regular basis ..." (Travel Plan, §4.46).

In fact, it is very likely that most of the residents of the proposed new houses would be employed in the Ipswich area or possibly commute to London, putting more pressure on the transport infrastructure. One third of the houses will be 'affordable', and are unlikely to be occupied by the highly qualified managerial and professional people likely to be employed at Adastral Park. The new residents of the affordable houses are more likely to work in the retail and manual sectors, and the main areas of employment for these are in Ipswich Town centre and Ransomes Europark.

Section 3.26

"This [1050 homes] is a difficult scale of development that does not readily support a range of services and facilities" This is at odds with the LDF Task Group's view (expressed at the meeting on 28th July, 2008) that building 1050 homes in Area 4 would allow for the strategic planning of services. No-one said at that meeting that 1050 homes was too few to support a range of services and facilities.

Sections 3.27 & 3.28

The list of services ignores the many other impacts that such a large development would have on the local infrastructure. For example, secondary school provision is not mentioned. All the secondary school pupils living in the new housing estate will be in the Kesgrave catchment area. But Kesgrave school is full to capacity and there is no room for expansion, so a new school will be needed (where will it go?) It would be far better and cheaper to disperse SCDC's housing requirements over several smaller areas, absorbing the demand for school places into existing schools (primary and secondary), possibly with extensions where needed.

(The problem of secondary schools is acknowledged in §3.38 - §3.41, but no reasonable solution is suggested, because there isn't one. Building only as many houses as are actually needed, and dispersing them over several sites would avoid, or at least reduce, the problem.)

Sections 4.18 & 4.19

PPS7 requires the promotion of the "continued protection of the open countryside for the benefit of all" Far from being in accord with this as BT claims, the building of a 2,000 dwelling estate will destroy 250 acres of open countryside, and is in direct conflict with PPS7.

PPS7 also promotes "discouraging the development of greenfield land". Despite BT's description of the site as "damaged by quarrying" (§4.19, 4th bullet) it is still a greenfield site. Are we really to accept that a landowner can damage a greenfield site, then argue that it is no longer greenfield and therefore is suitable for development?

PPS7 also requires patterns of development "preventing urban sprawl". This very large housing estate will extend the urban sprawl that is already happening East of Ipswich. If it is built, there will be continuous housing from Ipswich Town centre to Waldringfield Heath, and only one open field between that and the River Deben. It will completely change the character of what is currently a beautiful part of rural Suffolk, turning it into an extension of suburban Ipswich.

These comments also apply to the Environment Statement, §5.8

Section 4.28

The statement that the Waldringfield pit SSSI will remain in situ is unconvincing. Natural England lists several operations likely to damage the special interest of Waldringfield Pit SSSI. Amongst these are:

- The changing of water levels and tables and water utilisation
- Construction, removal or destruction of roads, tracks, walls, fences, hardstands, banks, ditches or other earthworks
- Erection of permanent or temporary structures
- Modification of natural or man-made features
- Recreational or other activities

It is difficult to see how this is consistent with retaining the SSSI within a large scale housing estate. Fig. 6.5 in the Design and Access Statement shows the SSSI directly adjoining Boulevard 3 and what appears to be a public plaza. Fig. 7.3 in the Design and Access Statement shows a public bus route running along Boulevard 3, adjacent to the SSSI.

No mention is made of the proximity of this development to the Newbourne Springs SSSI, the Martlesham Heath SSSI or the Deben Estuary SSSI, all of which will be profoundly affected by such a large number of houses, people, cars, pets, etc. so close by.

Also, no mention is made of the fact that the Deben Estuary is also a RAMSAR International Wetland Site, and the danger that wildlife (particularly migrating birds) will be adversely impacted.

(These are mentioned in the Environmental Statement, §12.27, but the only impact mentioned is on the Waldringfield Pit SSSI. It says this is considered in Section 13 (Ground and Groundwater Contamination), but no such consideration could be found in §13)

Section 4.29

"BT has consulted with Natural England ... who have indicated that this development has no significant impact on the SPA". We dispute this conclusion and question the method by which it was obtained. SPAs are strictly protected sites, classified for rare and vulnerable birds, and for regularly occurring migratory species. The notion that the Deben Estuary SPA will not be affected by a housing development of this magnitude, just 1.5km away is, to say the very least, debatable. We know nothing of the conversations between BT and Natural England. Did BT present Natural England with all the facts? Did Natural England consider the counter arguments? Did Natural England take into account the likely increase in boating and dog walking activities on the river and the vulnerable wildlife habitats in the estuary? These and other concerns should not be dismissed by the bland assurances in this section.

Section 5.23

"The Core Strategy Preferred Option is now expected to be published in October 2008" It should be made clear that this is only a draft, to be approved by the SCDC Cabinet, then to go out to public consultation (expected November 2008 to January 2009). It is quite possible that the public will disagree with the document's conclusions, and the public's views should not be ignored.

Sections 6.4 and 6.30

"The housing figures are expressly stated as minimum housing figures for the region, to be exceeded". The East of England Plan does not say the figures are "to be exceeded". It says: "District allocations should be regarded as minimum targets to be achieved, rather than ceilings which should not be exceeded", which is not the same thing at all.

Section 6.32

"there is every indication that ... the RSS will revise the minimum housing requirements further upward" This is pure conjecture and is not an argument for exceeding the current minimum target.

Section 6.34

"the site is available now" Most of the site will not be available until the quarrying has been exhausted, which will be at least 10 years.

Section 6.39

See comments on §3.26, §3.27 & §3.28. Most of the items listed could be supplied whatever the size of community, for example, a “comprehensive and high quality landscape framework”. Also, “development capacity to mitigate off-site landscape impacts” – if the site were smaller there would be less off-site landscape impacts to mitigate.

Section 6.40

“... the pressure on existing infrastructure of a lesser development would be significant ...” It is perverse to argue that fewer houses would produce more pressure on the infrastructure. Moreover, the pressure on existing infrastructure of several lesser developments (totalling the same number of houses overall) would also be less, as the problems and impacts would be dispersed.

Section 6.41

The policy compliance summary completely ignores the obvious fact that the proposed housing development violates policies AP8 (see §6.12) and AP25 (see §6.25).

AP8 says: “The landscape quality and character of the Countryside will be protected for its own sake by generally restricting development to that which is essential for the efficient operation of agriculture, forestry and horticulture or is otherwise permitted by other policies in the Local Plan”. Since the land proposed for housing development is designated as Countryside, the planning application is clearly in violation of AP8.

AP25 says: “... estate-scale development will not be permitted, other than within the defined physical limits of the Towns”. Again, the planning application is estate-scale and is not in a town, so it is clearly in violation of AP25.

The Local Plan also says: “The character of the Suffolk Coastal District is largely derived from the dispersed nature of its settlements, the widespread occurrence of hamlets and small groups of buildings, and their open form with gaps between dwellings. This character should be safeguarded. ... development in such areas, particularly housing, will be strongly resisted.” The proposed development is adjacent to the hamlet of Waldringfield Heath, and so clearly violates this statement.

Section 7.4

“The efficiency and effectiveness of such a scheme [carbon efficient energy generation] is massively increased if there are domestic activities that use the energy in the evenings and at weekends These are best provided by adjacent housing, hotels, etc which are part of a linked supply and distribution system”. In principle, we fully support the proposed carbon efficient energy generation scheme. As well as supplying energy to the hotel and the new and renovated buildings within Adastral Park, there is no reason why it couldn't supply energy to adjacent houses, such as those at Martlesham Heath, or possibly retailers and leisure suppliers such as Tesco, Kingpin, etc. None of this is dependent on the proposed housing development.

Section 7.5

“However, at this stage BT is reluctant to do this [replace grid supply with local renewable supply] if it simply released capacity for other competing land,” What other competing land? BT is not competing for land with anyone.

“... particularly with no mechanism for the apportionment of costs” Presumably BT would supply energy to other parties (domestic and commercial) at an agreed market rate. Is this a problem? How is this an argument for the housing development?

Section 7.7

“... the development [of the proposed new primary school] may initially be able to support existing local schools, safeguarding their future”. If the future of existing local primary schools is in danger from falling numbers (this is disputable), it is difficult to see how providing another school will safeguard this. On the contrary, if the new school has spare capacity, its presence could be used as an argument for closing local schools.

Section 7.8

As stated earlier, the problem of secondary schools is a serious one and no reasonable solution is suggested, because there isn't one. Building only as many houses as are actually needed, and dispersing them over several sites would avoid (or at least reduce) the problem, but this is overlooked by both this application and the LDF Preferred Options document.

"BT have a significant education outreach programme in local schools and colleges operating from the site ..." We fully support this, but it doesn't solve, or even mitigate, the secondary school problem which will be created by building 2,000 houses in an area that has no spare secondary education capacity.

Section 7.10

"... BT is working ... to address the challenges that development brings to the local transport network" No amount of 'working' on it will alter the fact that this development will generate huge traffic volumes, and that the transport network is already creaking. The A14 is already heavily congested, mainly with lorries going to/from Felixstowe port, and this is likely to get worse. Traffic heading for Essex will go over the Orwell Bridge, which cannot be widened.

Most of the traffic from the new housing estate will get onto the A12 via the road which runs between the Brightwell roundabout and Waldringfield Heath. This is a narrow rural road with 2 sharp bends where there are frequent accidents. It will become much more congested and dangerous as a result of this development.

"... the pressures that are created are relevant to all the options for development in the IPA ..." If SCDC's housing allocation were dispersed over several sites in the IPA, this would reduce the problem by spreading the impact over many roads and road junctions, instead of concentrating it on the A12 and the 2 already congested roundabouts covered by this application. (This obvious fact is ignored in the LDF Preferred Options document).

"... through locating residential development adjacent to the area's largest employer ... the options to reduce this pressure are substantially improved" This is unlikely – see comments on §3.21

Sections 7.13, 7.14 & 7.15

"Existing and future sand and gravel extraction provides an excellent opportunity to re-contour the land and prepare it for development ...". "... there is no conflict between the allocation of the land for mineral extraction, and its development to meet housing and economic objectives" "... restoring the land for development would be a very efficient and effective process ...". The existing planning permission requires the land to be restored to its original state. SCC's Minerals Specific Site Allocations Submission (Aug. 2008) states: "comprehensive restoration with adjoining land to provide heathland is preferred." (site 1A) and "Restoration would be to agriculture" (site 2A). This is incompatible with restoring the land for housing development.

Section 7.19 & 7.20

"BT needs to be able to continue to evolve and develop and to have the facilities available to do that."

"There is a significant risk of losing jobs in the area if no comprehensive planning application and permission is secured and implemented at this stage"

"This would match BT's objectives to exploit its current research operations ... consolidate its reputation as a world leader ... retain high value jobs locally"

The comments on §3.6 apply to these sections too. The development of BT's facilities, consolidation of its reputation and the provision of jobs have nothing to do with the building of 2,000 houses, and should not be used to blackmail the planning authority into granting permission prematurely (i.e. before the proper policies and framework is in place). There is no reason why developments within Adastral Park cannot be separated from the proposals for housing development on the adjoining land.

Statement of Community Engagement

This document is grossly misleading. The various small tweaks BT has made to its proposals resulting from the consultation process completely fail to address the concerns of the local community.

Sections 7 & 8, and Appendix I

The questionnaire and the interpretation of the responses are extremely misleading. There are 2 main problems:

- Some of the questions are general, but the responses are assumed to be specifically about BT's proposals. For example, Q5 ("I think that linking new homes to where jobs are is important") It is quite possible to agree with this statement in general but be opposed to its application in this instance, for all kinds of reasons. A tick in the 'strongly agree' box will be taken as support for BT's proposals, but may be nothing of the kind.
- Some of the questions assume the housing developments will go ahead, but the answers are being interpreted as support for the housing developments. For example, Q7 ("Do you think it is a good idea for BT to focus on the following areas as it works up its ideas into a clearer plan?") Anyone who is concerned about climate change will want to circle 'Yes' against 'Energy efficient buildings', but that doesn't mean they support BT's proposals, it simply means that if BT gets its way and builds 2,000 houses it is better that they are energy efficient than inefficient.

The most important question, which would have given genuine information on the popularity of BT's proposals was conspicuous by its absence: "Do you support BT's proposal to build 2,000 houses in the area adjoining Adastral Park?" Despite this omission, a majority of respondents who commented on this topic were opposed to BT's housing proposals (see §8.26) Needless to say, their views were ignored in §9.

Section 9.6

"A development of 2,000 new homes... would help to meet Suffolk Coastal District Council's requirements to provide new housing" 2,000 houses is roughly double SCDC's housing requirement for the Ipswich Policy Area. It is far in excess of the identified need.

"Following consultation, BT's proposals have been developed to incorporate suggestions including: ..."

It would appear from this that the list which follows is of features that weren't in the original proposals but have been added in response to the consultation. This is at best an exaggeration, but more accurately it is plain false. Every one of the facilities listed (except allotments and a public house) was already proposed by BT in its 'Martlesham made for innovation' document of Summer 2007, i.e. before the consultation proper started. This comment also applies to most of §10.2

Section 9.9

"In response to comments raised on landscaping and open space, BT's proposals have been developed to include A large new public park:" The public park was already proposed by BT in its 'Martlesham made for innovation' document of Summer 2007, i.e. before the consultation proper started.

"... incorporation of clearly identified areas of heathland ..." To claim this as an adequate response to public comments is ridiculous. The Waldringfield Wildlife Group (with the support of most of the people of Waldringfield) wrote to BT in Jan. '08 suggesting that BT use the land adjoining Adastral Park to regenerate the original lowland heathland, *instead of* building the houses. This is very different from creating a few small pockets of gorse, etc. in amongst 2,000 houses. (In the Design and Access Statement, §4.4, in the table of land use, heathland is not listed – presumably the area covered is too small to be worth mentioning). Why don't BT come clean and admit that they have simply ignored the WWG's proposals, and other similar suggestions?

Appendix H – Listening to Waldringfield

In Oct. '07, at the presentation by BT in Waldringfield Village Hall, there was total hostility from the public to BT's proposals to build 2,000 houses. It is no exaggeration to say that the people of Waldringfield are furious and outraged at what BT is proposing, for all sorts of reasons. The response was similar at the exhibition in April '08.

None of this is even mentioned in this document, let alone acted upon. The cosy picture painted of BT "listening to Waldringfield" and "responding" "to secure the best possible future for ... the local

community" is rubbish. BT has totally ignored the views of the overwhelming majority of the people of Waldringfield, who do not want 2,000 houses built on their doorstep.

On 28th August, Lawrence Revill (MD of David Lock Associates) wrote to Philip Radley (Head of Planning, SCDC) to explain why BT was submitting its application earlier than expected. One of the reasons he gave was "... alternative arguments and approaches may be raised, potentially reinforced by better organised local objectors." Attempting to wrong-foot the local community by submitting the application early in the hope that they will be less well organised is hardly in keeping with BT's claim that it is responding to the views of the local community.

Employment Statement

Waldringfield Parish Council broadly supports BT's proposals to modernise the facilities at Adastral Park, and thereby to create new jobs in the area. Insofar as this document relates to the land and buildings within the existing Adastral Park area, Waldringfield Parish Council supports its conclusions.

However, it should be noted that it is perfectly possible to modernise the facilities at Adastral Park (including the University and hotel), and generate new jobs there, without building 2,000 houses on the adjacent land.

Environmental Statement

Section 6.20

"Integration between the new residential community, the redeveloped employment site and the surrounding area (including overcoming the severance created by the A12) will to some extent depend on the legibility, ease and appeal of the walking and cycling provision." The new housing estate will be completely disconnected from the other urban areas east of Ipswich, such as Martlesham Heath. The A12 and the BT buildings in Adastral Park will form a barrier isolating the new residents from Martlesham Heath and making attempts to build linked communities impossible. No way of "overcoming the severance created by the A12" is suggested, apart from making footpaths and cycle paths more legibly signed and easier to use, which is hardly an adequate solution to the serious problem of bringing the two separated communities together.

Sections 6.54 & 6.71

"Existing local communities, particularly long established communities are not likely to see any significant impact, negative or otherwise, on their identities or functions". "... the identity and cohesion of these communities will not be significantly affected" These statements are outrageous! Waldringfield, Waldringfield Heath, Brightwell, Newbourne, etc will be subsumed into the urban sprawl of Ipswich. Their rural character will be totally destroyed. To give just one example, the road into Waldringfield in the summer is regularly a constant stream of traffic going to and from the Maybush public house. With 2,000 new households at one end of this road, what is already a dreadful problem will get far worse.

"The tourism and recreational functions of some communities such as Waldringfield may be heightened ..." Waldringfield cannot cope with more tourists (see above). More generally, tourism (i.e. people visiting from outside the area) is much more likely to be destroyed – who wants to spend their holidays in suburbia, or next to it? This is why Waldringfield is currently a tourist destination and Kesgrave, Grange Farm and Martlesham Heath aren't. If this housing development is approved, the tourists will simply go to prettier, more rural areas (if there are any left!)

Section 6.72

"It can therefore help facilitate 'energy or carbon consciousness'" A far better way to do this would be for BT to follow its own environmental policies and return the land to heathland. This would have a far smaller carbon footprint than building 2,000 houses, with their associated tarmac roads, concrete driveways and energy-consuming cars and home appliances. BT could then publicise its environmental credentials as a genuine example to all.

Section 7

The Transport section completely ignores the effect of the extra households on the road to Waldringfield, Newbourne Road and other small rural roads in the area (see comments on §6.54 and the Planning statement, §7.10)

Sections 7.14 & 7.15

The assessment of the impact on the transport system is wildly optimistic. The A12, A14, A1214 and Foxhall Road are all regularly gridlocked. They will probably get worse without this development, but with it they will certainly get very much worse.

"The development will add traffic to the A1214 and Foxhall Road corridors to/from Ipswich but would not create any additional capacity problems compared to the situation without development" This does not make sense. If the development adds traffic to these roads (that are already heavily congested) how will it fail to create additional capacity problems?

Section 10.68

Among the potential receptors listed are "potentially around 5 residential properties close to the site perimeter at Martlesham Heath, Sheepdrift Cottage and Waldringfield Heath". There are 19 residences at Waldringfield Heath, a pig farm, an industrial estate (7 Acres) a caravan park (Moon and Sixpence), a golf course, a demolition yard (CDC) and a Baptist Chapel, all within 150m of the site (many are much closer).

Section 10.115

"The degree of impact [on local residents] is likely to be medium to high, resulting in a substantial or major effect that is significant" Quite so! A pity this conclusion is ignored in the rest of the application, and is flatly contradicted in many places (e.g. "Existing local communities ... are not likely to see any significant impact, negative or otherwise ..." (§6.54)

Section 12.27

Although several environmentally sensitive areas are listed, the only impact mentioned is on the Waldringfield Pit SSSI. It says this is considered in Section 13 (Ground and Groundwater Contamination), but no such consideration could be found in §13.

Option 4 LDF

The siting of any additional housing should be sympathetic to its surroundings, not overload the local infrastructure and make use of the existing infrastructure as far as possible. Siting it closer to Ipswich and existing road, rail and bus routes would be far less damaging. The A12 is close to capacity already at peak times.

WPC believe that Option 4 is only being considered because BT have worked hand in hand with the planners and that this neatly provides them with an easy option to fulfil their housing requirements. No regard has been taken of local opinion.

Log Cabin Planning Appeal

82-83. BT had argued that "manufacturers have a duty to ensure that the antennas they produce comply with specifications issued by, amongst others, the European Telecommunications Standards Institution (ETSI) the International Telecommunications Union (ITU) and operators themselves, and that the rigour of testing procedures is assured by ISO 9000 quality management standards. They provided evidence that this is one of the best sites in Europe and that no other site that can meet all of its requirements has been identified. Manufacturers are reluctant to provide the necessary high precision testing facilities to validate the designs ..., therefore BT needs to check the tests that are undertaken by manufacturers to satisfy updating of the core and access networks to so-called 21st Century Networks (21CN)"

It would seem very short sighted of BT to now be planning to dispose of a facility they described as being essential only 18 months ago, for short term gain.

Neighbouring sites are already advertising the planning potential of adjoining land, eg. the advert for 69 acres of arable land at Foxburrow Farm.

“Development Opportunities

We understand from the Vendor that there are some possible long term development opportunities that have been considered (subject to planning permission), including:

- Possible use for wind turbines.
- There is a proposed development of 2,000 houses, hotel and shop units currently proposed on the nearby gravel pits. This may offer other development opportunities.

There is currently an application in for a Licence to bring in topsoil to fill in low areas.

If the application is successful and the Purchaser wishes to proceed, then the Vendor is proposing a 50 / 50 split of the income from this project.

Access

The land is accessed via a right of way over the Vendor's retained land (as shaded brown on the plan). This in turn is accessed directly from the public highway.

Covenant

The Purchaser will be required to enter into a Covenant whereby the Vendor will receive 20 % of the increase in value of the property in the event that planning permission for any type of development is granted.

Services

The property benefits from a private water supply via a well.”

Design and Access Statement

Several of the figures appear to be contradictory. For example, Fig. 4.11 shows several narrow belts of heathland running roughly north-south, just north of the southern site boundary. In Fig. 6.3 these are shown variously as woodland, community orchard and mown amenity grass, but none is shown as heathland. In Fig. 4.2 (and others) the triangular area at the eastern end of the site is marked as allotments, but this is not the case in Figs. 4.11 or 6.3. In Fig. 4.11, heathland is marked on the northeast side of the central park and woodland on the southeastern side. However, in Fig. 4.2 heathland is marked on the southeastern side (18)! In Fig. 6.3 the northeastern side is marked as 'alder carr and regenerating heath' and a thin strip of heathland is shown all the way round the park, except to the southeast.

These inconsistencies can no doubt be rectified, but it makes the task of assessing the planning application impossible, as we do not know which version is the one we are supposed to be commenting on. It also suggests that the application has been rushed, and that these landscape and amenity features were added as an afterthought.

Section 3.2.2

“It [BT's proposals for Adastral Park] is the only potential development site in SCDC's LDF Further Issues and Options document to be able to link jobs and homes within a properly planned development”. The potential development site referred to is Area 4. Of the 5 areas considered in the LDF document, Area 4 is furthest from 2 of the major local centres of employment – Ipswich Town centre and Ransomes Europark. It is unlikely that more than 3% of the residents of the proposed new houses in Area 4 will work at Adastral Park (see comments on the Planning Statement, §3.21). The linkage between homes and jobs is far stronger for Areas 1 and 3 and particularly for Area 5, which is adjacent to Ransomes Europark.

In Fig.3.3 (Residential Development Concept) a green line labelled 'Continuous green perimeter' is shown going round the East side of the site, inside the site boundary. However, many other figures show no woodland, or any other 'green' features, inside the site boundary along the eastern perimeter. In Figs. 6.1 & 6.3 a residential road is clearly shown right next to the site boundary. This is part of the 'residential edge' area, containing houses up to 3 stories high. It appears that the 'green perimeter' has been lost somewhere between the 'concept' and detailed design stages.

Section 3.2.3

“The proposals for a sustainable energy strategy for the redeveloped Adastral Park are made more effective with the presence of neighbouring homes that can use energy in the evenings and weekends to balance weekday demands from the employment areas.” The neighbouring homes needed to balance demand are already there – in Martlesham Heath. There is no need to build more in order to balance demand.

Section 3.3.3

See comments on the Planning Statement, §3.15 & §3.24.

Section 4.1.2

Fig 4.2: it is interesting that Waldringfield Heath, a hamlet of 19 residences, does not feature in the list of 'Local Context Features', despite the fact that it is only a few metres from the eastern boundary of the site. This is indicative of the amount of attention paid by BT to the local community.

Section 4.2.2

It is claimed that the following enhancement was made as a result of the public consultation:

"Increased woodland provision on perimeter of the site to create a continuous woodland edge around the site ..." In fact, the final plan (Fig. 4.2) shows no woodland on the eastern boundary of the site, between Spratt's Plantation (11) and the southeastern corner (22), whereas the original plan (Fig. 4.3, Dec. '06) shows a thick continuous strip of woodland between these points. This woodland strip is there in Fig. 4.4 (Feb. '07), is thinner in Figs. 4.5 (May '07) and 4.7 (Mar/Apr. '07) and seems to have disappeared altogether in the final version (Fig. 4.2, Sept. '08), so the claim that it has been enhanced over time is in fact the opposite of the reality.

One of the changes 'informed by public consultation' was to "clearly identify heathland on master plan ...". However, there is no indication of heathland either in Fig. 4.8 or Fig. 4.2 (apart from the legend item 'heathland edge to central park' (18), the location of which is extremely vague on the map.)

Section 4.4

In the table of land use, heathland is not listed – presumably the area covered is too small to be worth mentioning.

Section 4.4.11

"... the development can contribute to secondary schooling through planning agreements ..." It is difficult to see how the additional demand for secondary school places from 2,000 families (in an area which is already full to capacity, and where there is no room for expansion) will do anything but create problems.

Section 5.2.1

"This requirement [for developers to exceed Government sustainability guidelines] assumes that Level achievement ... will not affect project viability" This is an interesting get-out clause. Presumably if project viability is affected by the need to exceed Government sustainability guidelines, the requirement on the developers will be dropped.

Section 5.6.2

The proposed residential buildings covering the major part of the development (pale blue in Fig. 5.6) are up to 3 stories high. This is far too high to be obscured by the tree barriers (where they exists), and is not normal for residential housing, apart from apartment blocks. It is certainly not compatible with the claim that "formal tree planning, woodland and tree belts will become the most dominant features of the site" (§5.3.1).

Section 5.6.3

"The lowest density of residential development relates to the site edges on its southern, western and eastern and part of the northern edge." Fig. 5.7 shows medium density housing coming right up to the site's eastern edge, next to the allotment area.

Section 5.7.3

Fig. 5.15i is very misleading. The area marked 'existing landscaped edge reinforced' is outside the development site. It appears that no new tree planting (or at most a single line of trees) is intended along this part of the site boundary. The height of the trees appears to be greater than the height of the houses. However, the existing trees in the Moon and Sixpence site are nowhere near 3 stories high, and it is unlikely that new planting (if there is any, which is far from clear) will achieve that height in the timescales of this development, even with fast growing, tall species.

Section 5.7.11

"Lighting will be designed to control to avoid [sic] light pollution" It is difficult to see how a development on this scale could possibly avoid creating light pollution.

Section 7.5.5

It would be useful if the bridleways were shown on a map. There is no indication of the bridleways in Fig. 7.1, Fig. 7.4 or anywhere else.

Section 7.5.7

"These designs aim to maintain the capacity of the A12, whilst still providing minimal delay for minor traffic approaches" There is usually considerable delay at the Foxhall Road roundabout, approaching from Heath Road, during rush hour and often at the weekends. This traffic originates mainly from Waldringfield and Newbourne (combined populations approximately 600). This will be made much worse by the extra traffic leaving the new housing estate (estimated population 4,800) from the 2 south side exits. From the size of the populations feeding into this road, we can expect traffic volumes to increase ten-fold.

Section 8.1

The comments on the Planning Statement, §3.6 also apply here. Market demands and BT's own operational requirements will not be addressed by building houses, and there is no justification for linking the modernisation of BT's R&D facilities to the proposed housing development.

"To succeed in meeting and delivering the growth strategy for the East of England new housing is required rapidly and Adastral Park can help deliver it." The timescale for the delivery of SCDC's housing allocation is completely separate from this application – there is no evidence that SCDC would have difficulties in meeting its targets if the housing proposed in this application were refused or delayed.

Apart from the statement that "... development of the surrounding land could commence in 2011", no actual timescale is provided. A timeline showing elapsed years (even if actual dates were omitted), such as the one in 'Martlesham made for innovation', would have been useful in assessing the acceptability of the proposals.

Section 8.3

It is strange that the phasing plans for the 'employment campus' have been omitted (to be developed at future stages), when it would seem that this is the most urgent part of the application, which BT needs "to maximise the potential of BT's technology advances", "to attract new businesses to Adastral Park" and "to present new job creation opportunities". Apparently, the only part of the application sufficiently urgent to warrant including in the phasing section is the need to secure the windfall from selling the land for housing.

Section 8.3.1

"Before development can commence ... sand and gravel will be extracted" The planning permissions required for the extraction of sand and gravel from this area have not yet been obtained. This application assumes minerals extraction permissions and various details of those permissions will be given, and is therefore premature.

Section 8.3.2

"Relocation of the extraction works operation ... to a site on the south-eastern edge of the application, near Heath Road" This makes no sense. Fig. 8.2 shows this area as residential in Phase 1. If the map we should be referring to is Fig. 8.1 it would make more sense, but Fig. 8.1 doesn't show any detail, such as exactly where the machinery and stockpile of extracted material would be.

During Phase 1, the southern access point and the road between it and the Foxhall Road roundabout will serve the new residential community, the sand and gravel extraction operation and the building site traffic simultaneously. This is far too much for a single road, especially since the Foxhall Road roundabout will not have been 'improved' at this stage. The junction at the southern access point is on a nasty bend in Heath Road

The houses on the west side of the Phase 1 development will be directly adjacent to the relocated Brett Aggregates site to the south of the Central Park, with no buffer zone. This is unacceptable and violates the rules for minerals extraction.

Section 8.3.3

During Phase 2, the houses on the west side of the Phase 1 development and those on the east side of the Phase 2 development will both be directly adjacent to the Brett Aggregates site to the south of the Central Park, with no buffer zones. This is unacceptable and violates the rules for minerals extraction.

Transport Statement

No mention is made of the impact of the development on the emergency services. The proposed development will add 850-1,000 vehicle trips to the network in peak hours (§9.13). This will increase road congestion, particularly on the A12, A14, Foxhall Road, A1214 and C356, and is bound to make it more difficult for emergency vehicles to move quickly, and will increase response times, possibly endangering life.

Section 5.36, 5.37 & 5.39

BT admits that “the existing bus services from these towns [Woodbridge and Felixstowe] is very poor” and that “Journey times on Superoute 66 to/from Ipswich town centre and the railway station are relatively unattractive at present”. There are no railway stations nearby, and BT’s hope that one might be built at Adastral Park or Martlesham is extremely unlikely to materialise. In other words, placing 2,000 houses in an area that is already poorly served by public transport will simply make matters worse. If the houses really must go somewhere, it would be far better to put them close to existing public transport routes, e.g. a railway line.

Sections 7.117 to 7.119

It is not clear how the PICADY capacity assessments were done, but the conclusion that the 2 new junctions on the south side of the site will “operate satisfactorily in both the AM and PM peaks in 2018” is obviously flawed. The comments on the Design and Access Statement, section 7.5.7, showing that the traffic volume on this stretch of road is likely to increase ten-fold, also apply here. Most of the residential traffic will use the southern exits as these are the nearest to the houses. (BT’s own figures show that the extra traffic generated by the new residents will be 553 vehicles in the am rush hour and 755 in the pm rush hour (Table 24, §6.34), far in excess of current traffic levels.) The large amount of extra residential traffic is due to the fact that most of the new residents will not be employed at Adastral Park, but will commute to work elsewhere, and most will travel by car.

Section 7.122

“With regards to residential traffic, there are few facilities within these villages [Waldringfield and Newbourne] that are not available more conveniently either within the proposed development or within the Ipswich build up area.” This is simply not true. The Maybush at Waldringfield and the Fox at Newbourne are popular village pubs, the former enjoying a unique riverside location. Waldringfield also has an attractive beach (the only one between Woodbridge and Felixstowe Ferry), and many widely used footpaths. The Newbourne Springs SSSI is also very popular. Traffic modelling based on the assumption that very few people will drive to Waldringfield or Newbourne because there are “few facilities within these villages” is therefore fundamentally flawed. It is very likely that large numbers of the new residents will be attracted to the facilities at Waldringfield and Newbourne, and will cause severe congestion on the narrow (in places single track) roads, which are already severely congested in the summer and at weekends.

Sections 7.36 to 7.39

The introduction of traffic lights on the A12 junctions will cause significant delays in several parts of the local road network. For example the traffic approaching the Foxhall Road/A12 junction in a southerly direction will experience a doubling of journey times (from roughly 50 seconds to over 100 seconds over the set distance) during both the am and pm rush hours, in 2018 (Fig. 7-8). Approaching this junction from the Foxhall Road, journey times in the pm rush hour increase by over 750% (from about 40 seconds to over 300 seconds). This is two and a half traffic light cycles, and is described as “acceptable as it allows the efficient movement of traffic along the A12” We doubt if the drivers stuck in the queue will see it that way!