

Outline Planning Application for up to 2000 Dwellings on land to the South & East of Adastral Park SECOND CONSULTATION RESPONSE

DC/17/1435/OUT – Land to the south and east of Adastral Park - Outline planning application for up to 2000 dwellings, an employment area of c0.6ha (use Class B1), primary local centre (comprising use Classes A1, A2, A3, A4, A5, B1, C3, D1 and D2), secondary centre (comprising possible use Classes A1, A3 and A4), a school, green infrastructure (including Suitable Accessible Natural Greenspace (SANGs), outdoor play areas, sports ground and allotments/community orchards), public footpaths and cycleways, vehicle accesses and associated infrastructure.

Introduction

This document is Martlesham Parish Council's response to the second consultation on the application for 2000 houses and is specifically focused on the applicant's answers to our questions raised following the first consultation.

The Parish Council thanks CEG for providing answers to our questions which were phrased as Suggested Improvements (SI), Clarification Required (CR) and perceived Errors or Omissions (EO). However we were disappointed that we had to request a significant extension from SCDC to the response deadline because of the delay from CEG in providing answers.

This short response focusses on the key areas we still consider important in this application taking into account CEG's answers and further information given. **Yellow highlighting** indicates we still have concerns. **Green highlighting** shows we note CEG's comments and add our comments to reinforce and add detail.

Major concerns still exist:

1. THE CAPABILITY OF THE TRANSPORT INFRASTRUCTURE

The separate BCL response has been studied and further questions asked. We have two main concerns: one the A12 and its new junctions and their capability to cope with the growth due to this development; the other the impact on the Retail and Business area. The first is being studied and modelled by SCC and one of our councillors has made a considerable effort to follow and understand this issue. We await the outcome from the various professional bodies involved in highways studies as we understand the work is still ongoing. We cannot support any single proposal until an agreed technical solution has been achieved which satisfies all professional concerns. Our concerns about rat running have not been allayed so we also make further comment on this.

The A12 and its new junctions

As roundabouts are being re-engineered the opportunity should be taken to accommodate our concerns:

- Eagle Way crossing at Manor Road

The original proposals for removal of this roundabout would have given the opportunity to make the crossing at the east end of Manor Road safer. The new scheme removes that option and we ask SCC to consider jointly with CEG how that can be achieved as part of the

roundabout re-engineering. At a minimum some form of traffic calming as it enters Eagle Way from the A12 is needed.

- Improvements at Martlesham (Tesco) roundabout

The Parish Council has received a number of complaints about this problem in the past. Also at peak times it is very common to see traffic exit Anson Rd in the left lane and then turn right up the A12, often without signalling - this makes exiting Eagle Way a risky manoeuvre at peak times.

We are still very concerned that the bottleneck going from the Tesco mini roundabout to the A12 is not being addressed. We feel strongly that the short link from the Tesco roundabout to the A12 should be considered as part of the overall A12 junction at that point for planning improvements.

- Issues with A1214/A12 (Park & Ride) roundabout

This includes difficulties going towards Ipswich from "Main Road" and regular incidents at the junction are worsened by Latitude and Suffolk Show traffic etc, and will be made worse with traffic from the new development.

- Problems with ingress & egress from Martlesham Heath

We proposed the provision of hatching on the Martlesham and BT roundabouts to ease the problem of getting out of or into Martlesham Heath when continuous queues form on those junctions (as has happened due to incidents or unusual traffic situations such as the Suffolk Show or Latitudes). Please reconsider our suggestion in conjunction with SCC - it would be simple to do as part of the initial re-engineering and avoid further disruption at a later date.

The impact on the Retail and Business area

This is largely being ignored as being a pre-existing situation which is not helpful. This development will definitely increase traffic problems in this area, although the provision of cycleways and footpaths will help, the area itself is not currently designed to be cycle or pedestrian friendly. Many new residents will drive to this area on their way out or back from journeys to elsewhere, as well as using the car, for example, for a weekly shop at Tesco or for purchasing bulky goods. It is in CEG's interests to help provide a pleasant accessible shopping experience for their new residents; it will help sell houses. It is in the business and retail park owners' interests for their customers to be able to shop or use local businesses easily. It is in the long term interest of SCC Highways not to have serious congestion in this area which easily leads to A12 congestion.

Therefore MPC strongly urges that SCDC convene a meeting of all parties to discuss possible solutions. This initial meeting should be exploratory with no initial requests for funds from any parties but to enable joint ownership of the problems and to suggest a way forward.

We reject entirely the concept that mitigation work is required on distant infrastructure while our local concerns are not being addressed.

Any strategy must fully address the need to improve the non-vehicular connections to Betts Avenue, the Retail Park etc. and movement within the retail area. The Parish Council is very keen to cooperate with CEG and SCC by walking the routes to identify problems and possible solutions, involving local residents who previously commented on the poor pedestrian, cycle and mobility scooter access arrangements in the retail area. None of this would be expensive work; it mostly

involves better provision of dropped curbs and avoiding pedestrians having to share access with vehicles into the retail car parks.

Other local concerns

- **The Old Felixstowe Road**
The development will make the situation worse, especially with the north quadrant exit and the increased conflict between vehicles and pedestrian/cyclists using the route from Spratt's Plantation to the Community Centre and Retail Park. Therefore contribution to mitigation should be made.

We therefore request that:-

- a) SCC carries out a safety audit of Old Felixstowe Road. This needs to include an evaluation of the safety of the staggered crossroads at the top of Gloster Road. There was a fatality there several years ago and its design is ill-suited to the increase in traffic levels using that junction.
 - b) Give serious consideration to physical traffic calming measures (not speed bumps) sufficient to restore a safe cycle priority route.
- **Gloster Road/Barrack Square junction**
The new development will exacerbate the current situation, especially the return to a single exit from the BT Adastral Park premises. All the afternoon peak hour traffic exiting from BT will as a result be in a single continuous stream along Barrack Square. The latest modified design of the junction will do nothing to help southbound traffic on Gloster Road filter in to Barrack Square to reach the A12. This is likely to add to the load on the only other two exits, i.e. past the Tesco mini roundabout or the Old Felixstowe Rd. Has consideration been given to creating an additional outbound lane along Barrack Square to ease the flow onto the A12? This could also enable a right turn central refuge for traffic turning right into the proposed hotel; any blockage here would quickly ripple back to the A12 in the morning peak.

2. THE FUTURE OF HEALTH CARE FACILITIES

MPC has made clear its preference for extending the existing surgery to support the ageing current population and to provide service to the new residents as the development progresses. It is likely that the new residents of the development will not have the same needs or mobility issues (i.e. they will be younger), and if a "super surgery" is eventually built centrally to the new development it will be out of balance with its main user base.

We understand that there is scope to create a single enlarged facility at The Square in Martlesham Heath. As this will put the facility at the centre of its user base which includes some of Grange Farm, existing Martlesham and the new development we wish this solution to be implemented.

We are now making this same view (based on evidence from the Neighbourhood Plan) known to the Martlesham Heath Surgery.

3. HOUSING

CEG's answers raised concerns about the viability of provision of 33% affordable homes (as required by SCDC and supported by MPC) and we would be disappointed if this commitment was avoided.

We are reassured by responses on maximum storey heights for areas and look forward to conditions and reserved matters decisions to honour commitments to:

- Max 2000 properties
- Primarily two storey structures
- Mix of housing types in each neighbourhood
- Sheltered accommodation
- Disabled access

Car Parking

- MPC is aware of SCC's recommended parking standards as we commented on the consultation leading up to their adoption. We would point out that these are merely recommendations - we know that because we have an example where SCC agreed to significantly fewer spaces for one application than the standard suggested.
- We have seen the impact of no van provision at the Bloor Homes Mill Heath site opposite the Black Tiles where vans routinely park in the "statement" entrance to the development, and along Main Road.
- White vans are likely to be more prevalent in the denser parts of the site so this is where the problems, neighbour disputes etc. are more likely to arise.
- We urge CEG to reconsider this policy - it is not set in stone and the businesses using these vans are an essential part of the modern economy & making provision for them will enhance the attractiveness of the development.

ENVIRONMENTAL PROTECTION

The effect of the development on noise, pollution and congestion levels must be monitored and controlled using reliable 24/7 base figures which consider all the variables. This goes beyond traffic noise, e.g. droning noises from the BT water tower will become a problem for new residents. As a start we have agreed with SCDC that a replacement diffusion tube will be located somewhere in the vicinity of the southern end of Lancaster Drive to monitor the impact of the changes to traffic flow characteristics once the new junction comes into service.

We note and are grateful for the commitments and explanations given; we expect conditions and reserved matters decisions to reflect these:

- Respect will be shown for the rural nature of the AONB and European sites and the geological SSSI, which will all be protected. We rely on SCDC policy SP20, specifically "the Council (SCDC) will require further proposals to be supported by an Appropriate Assessment to meet the requirements of the Habitats Regulations. If the results of the Appropriate Assessment show that part of the Strategy cannot be delivered without adverse impacts on designated European sites which cannot be mitigated, then the proposals will only make provision for the level and location of development for which it can be concluded

that there will be no adverse effect on the integrity of a designated European nature conservation site.”

- Early delivery of green infrastructure, SANG, open spaces, recreational routes within and beyond the site, which will be attractive to new and existing residents.
Following a recent Waldringfield Quarry liaison meeting we are concerned that Brett’s plans to remove the concrete plant on the northern edge of the lake may not fit with the phasing plan for the SANGS area which is to be created as part of Phase 1. Brett consider it too expensive to relocate.
- The RAMS, a “Formal Responsible Management Body” for the green infrastructure and wardening.
- Arboricultural Impact Assessment and Tree Survey. The following has not specifically been included in the response
 - An arboricultural method statement will be produced
 - Spratt’s Plantation will have a Woodland Management Plan
 - Green waste from Spratt’s plantation will be removed
 - The removal of trees from the scheduled monument in Spratt’s Plantation is carried out correctly
 - That no protected species or habitats are harmed whilst carrying out site clearance or tree surgery works.

BUILT FACILITIES AND COMMUNITY INTEGRATION

A major gap in provision within Martlesham is that of an indoor sports facility, we would like to see early provision of that and expect this to be an example of facilities shared between the school and the wider community.

The Parish Council would welcome the opportunity to join the working group on community cohesion.

We again note and are grateful for the commitments and explanations given. We expect conditions and reserved matters decisions to reflect these:

- Early provision of the school, which ensures spaces are kept for the growing population
- Primary lakeside site for facilities
- The play approach which will provide a variety of high standard equipment suitable for all ages
- Protection of the barrow at the Heritage Park and the interpretation policy

PHYSICAL LINKS BETWEEN THE PROPOSED AND EXISTING SETTLEMENTS

Martlesham Parish Council will be happy to enter a dialogue with other councils to secure a safe and convenient pedestrian and cycle link to Woodbridge.

This section refers to the revised maps “Key Local Connection Strategy 1 and 2” (The Map) and the points 3e – 3m in the BCL response to issues.

- BCL 3d: We appreciate the assurances re the convenience of bus stops at the A1214/A1189 gyratory which could not be picked up from 10391-HL-27.
- BCL 3e: Even when softened with landscaping the route through the northern quadrant will remain an unsatisfactory enclosed passage through security fences. We accept this is not the developer’s responsibility but point out that this feature will make the development less desirable.

Our long term aim would be to have the security fence removed and have the businesses rely on protecting individual buildings. This would have the advantage of making the area physically more attractive for new and expanding businesses.

- BCL 3f: We note the comments.
- BCL 3g: We reinforce this point as the response is at odds with the map.

There is an existing key cycle/pedestrian route running from the stopped off Old Felixstowe Road to the south of the proposed A12 crossing (not shown on the map), into Barrack Square and through the business and retail areas to the cycle priority route on the northern stretch of Old Felixstowe road. This is not shown on the connection strategy map which shows only a 2m potential footway along this stretch, not the 3m shared route in the response. Residents of the new development will find this route convenient for access to destinations to the north and south. This route needs to be shown and secured as a cycle way and planned as a whole with appropriate and coherent separation, safety and signalling provision.

- BCL 3h: Our comments are acknowledged but not accepted. We therefore rely on the map to indicate our concerns have been dealt with, assuming this will be provided with a firm all-weather surface capable of withstanding damage from horses’ hooves.
- BCL 3i: Our concerns regarding movements to the north and west of the site for access to open green space have not been addressed and therefore still stand.
- BCL 3j: In the light of no equestrian traffic we would be content for this to become an installation which included facilities for pedestrians and cyclists. We reinforce our concern as it was not addressed in the response.
- Route BR6 – crossing - proposed upgrade - BR11 - BR34. This has the potential to become an important cycle/pedestrian route for new residents travelling east and west and for access from the west to employment areas and the countryside. As such it should be designed and built as a safe improved single route with a firm all weather surface capable of withstanding damage from horses’ hooves. It should also be capable of extension into Kesgrave and its proposed developments, with a safe crossing at Dobb’s Lane.

- As regards suggested changes to PROWs within the development we are content for this to happen as long as convenient routes are maintained and signposted for those passing through on longer journeys.
- It is a long standing policy that we wish to see the Deben river side footpath restored which would be an amenity for new residents as long as access was controlled by well-marked and wardened routes.

Note: The Isochrone map (fig 6c) is very unclear and we'd estimated the centre as being the west end of the north exit. Our suggestion of using the proposed community centre as the Isochrone centre was offered as being somewhere near the centre of the populated area. However if it is centred on the T junction exit then we still do not agree with the distances quoted in the table, e.g. the distance from there to the Martlesham Heath Village centre is 1.42 km by foot or bike via Barrack Square and over the footbridge (not 0.75km as you show). All other distances to the west are similarly understated.

Mapping issues

- Track from near Gorselands School/Control Tower (The Perimeter Track) is used and signposted as a cycle route.
- South branch of the track from the School and the Control Tower (which shows an incorrect reference to a footbridge) and the track south of Martlesham Heath Green through the Birch Woods.

Above are only examples of routes through the existing buildings and green areas. Showing them as special routes give them unjustified status, may encourage needless over use and serves no useful purpose. Therefore they should not be shown.

- Map does not show the cycle route alongside the A12 from the stopped off southern portion of Old Felixstowe Road which connects with Barrack Square.

This concludes our response to the second consultation

Note: Mike Carpenter of CODE Development Planners raised a question on Community Buildings on page 18 of our response

'Not clear on meaning of MPC's comment noted as error. Would be grateful for confirmation'.

This was listed as an Omission rather than an error. CEG mentioned a programme to facilitate Community buildings, but there was nothing in the documents about this. Not essential as part of this response but we would like sight of any documentation when available.

Susan Robertson
Clerk to Martlesham Parish Council
2nd August 2017