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## 1.0 Introduction

- 1.1 This document forms part of the revised outline planning application for the regeneration of Adastral Park and surrounding land submitted by BT in April 2009.
- 1.2 BT's proposals seek to secure Adastral Park's long-term future as a world-class centre for technology and innovation, and ensure that it remains a key contributor to the local, regional and national economy. Adastral Park itself covers nearly 40 ha (100 acres), and BT owns a further 100 ha (250 acres) of land surrounding the site, much of which has been or will be quarried to extract sand and gravel. BT's proposals include plans for the creation of a new residential community alongside Adastral Park, with its own infrastructure, services and facilities. BT believes this site presents a unique opportunity to create a truly integrated living and working community, and a genuinely sustainable development to help meet the local need for new homes.
- 1.3 BT submitted an outline a planning application for the redevelopment of Adastral Park and land to the east and south on 12 September 2008. Comments received from Suffolk Coastal District Council, statutory consultees and local residents since submission have led to an agreement to make proposed changes to the master plan layout. As a result, BT decided to withdraw the first application and submit this revised application. The changes to the layout are explained in the *Design and Access Statement*.
- 1.4 BT's proposals for the regeneration of Adastral Park and surrounding land includes:
- Upgrades to existing employment floorspace and the creation of up to 60,000 square metres of new employment floorspace
  - The creation of approximately 2,000 new jobs at Adastral Park
  - A residential community of up to 2,000 new homes alongside Adastral Park
  - Comprehensive new infrastructure and services to serve the new residential community, including new education and healthcare provision, public transport, shops, leisure & sports facilities and public spaces
  - A hotel to cater for business visitors and tourists
  - An on-site energy centre to provide renewable heat and power, reducing our dependency on the National Grid
  - Significant development of the existing transport infrastructure, including improved A12 access
  - An expansion of the University presence at Adastral Park.
- 1.5 Successful development of Adastral Park has the opportunity to provide a positive legacy for Suffolk and the wider region.
- 1.6 David Lock Associates has prepared this Planning Statement on behalf of BT. The Planning Statement addresses the following issues:
- It outlines the site's location, physical context and relevant history;

- It describes the proposed development;
- It highlights the national, regional and local planning policies that form the context for the proposal; and
- It describes the favourable planning context within which the proposals contained in the planning application have been prepared.

## **Planning Application Documentation**

1.7 The planning application comprises:

- Covering Letter
- Forms and Certificates
  - Ownership Certificate
  - Agricultural Holdings Certificate
  - Notice as required by Article 6
- Application Drawings
  - BTP012 - 001 - G - Framework Plan;
  - BTP012 - 016 - C - Location Plan;
  - BTP012 - 017 - C – Site Definition Plan;
  - BTP012 - 018 - C - Access & Circulation;
  - BTP012 - 019 - C - Landscape Framework Plan;
  - BTP012 - 020 – C - Storey Heights;
  - BTP012 - 023 - Proposed Junction Improvements 1 of 2; and
  - BTP012 - 024 - Proposed Junction Improvements 2 of 2.
- Planning Statement
- Design and Access Statement
- Environmental Statement
- Non-Technical Summary of the Environmental Statement
- Transport Assessment
- Travel Plan
- Employment Statement
- Statement of Community Engagement
- Energy and Carbon Strategy
- Sustainability Statement

## **Description of Development**

1.8 The formal description of development comprises:

Refurbishment of Adastral Park and development of adjoining land to provide:

- **Up to 60,000 sqm net additional employment floorspace**, related car parking spaces and landscaping (B1);
- **Up to 2,000 homes**, related car parking spaces and landscaping (C3);
- **mixed use local centre** (*comprising health care provision (D1), community centre (D1) retail (A1), Café (A3), Public House (A4), Takeaway (A5)*), related car parking spaces and landscaping;
- **education provision (D1)**;
- **hotel**, related car parking spaces and landscaping (C1);
- **energy centre** and other **utility infrastructure** (*Sui Generis*);
- **public park** and other areas of **public open space**, including formal open space provision for recreation and play;
- supporting **services** and facilities;
- network of landscape designed **boulevards and streets** to provide access and utility services for the development;
- full provision for the operation of **public transport** through the development, primarily on the boulevards and main streets;
- **new road connections** to C356 (Newbourne Road/Heath Road/Waldringfield Road) and related road improvements;
- **changes to junctions on the A12**;
- **Landscape areas** and visual buffers around the perimeter of the land;
- **Ground remodelling** following minerals extraction (subject to separate minerals planning application)
- **Other minor works and development ancillary to the main proposals**

## 2.0 Context

### History of the Site

- 2.1 Martlesham Heath Business Park and Adastral Park lie close to Woodbridge and Ipswich. Both lie adjacent to Martlesham – the original village – and to Martlesham Heath – a late twentieth century community. The adjacent A12, together with the A14 which runs to the south of Ipswich, provides good access to the rest of the county and to the rest of the UK.
- 2.2 The Martlesham Heath area, once an aerodrome of the RAF, has always had connections with innovation, research and development. In 1917 the War Office moved its Royal Flying Corps Testing Squadron to Martlesham Heath. In the 1924 the base became known as the Aeroplane and Armament Experimental Establishment, researching and testing military and civil aircraft alike. The Airfield returned to experimental duties after the War. The flight history of the aerodrome ceased when the last plane flew out in 1963. However, innovations continued.
- 2.3 In 1972 work started on Martlesham Heath, the location for a new village, with environmental sustainability at the forefront of thinking. In 1968 Post Office Telephones committed to move its research station from Dollis Hill in London to 110 acres of the former airfield. It was attracted to the site because the surrounding countryside is relatively flat - ideal for testing the radio-based communications systems that were leading edge at the time. The Main Laboratory Block (Orion Building), incorporating the Radio Tower (Pegasus Tower), was the first new building to be built on the site during the Post Office occupation of the site and was opened by the Queen in 1975. At the same time work started on the conversion of airfield buildings and the construction of new buildings to create Martlesham Heath Business Park, home to a wide range of other businesses, to the north of the Post Office Research Station.
- 2.4 When the postal and communications activities of the Post Office were separated, ownership of the site moved to BT and its name was changed to BT Research Laboratories.
- 2.5 In 1999 the name BT Laboratories was changed to Adastral Park, providing a link to the Park's former use, deriving its name from the Royal Air Force's motto - *Per Ardua Ad Astra*, or "through adversity to the stars". Adastral Park is the centre for development of Information and Communications Technology (ICT) for BT and other leading associated companies and industry is home to ICT research from two Universities – University of Essex and University College London (UCL). Suffolk New College have agreed to transfer their ICOVE work to Adastral Park from September 2008.

- 2.6 Adastral Park is now a world renowned centre for ICT research. BT currently supports approximately 3,600 jobs with another 400 jobs in other companies; at its peak Adastral Park supported up to 5,000 jobs on site. An estimated £850 million is spent through Adastral Park each year<sup>1</sup>, to the benefit of the local and regional economy, and this focus for economic activity is further complemented by the adjoining Martlesham Heath Business Park.

## Site Location and Physical Context

- 2.7 A comprehensive description of the land's location and site context is included within the *Design and Access Statement*. A summary follows.
- 2.8 The planning application area comprises Adastral Park as described above as well as 117 hectares of land immediately adjacent to Adastral Park. This land is relatively flat with few natural features, and is well suited to construction. It is surrounded on most sides by mature woodland and thick hedgerows and woodland belts that restrict views of it from the surrounding area. The containment of woodland and trees, which create a defined green edge, can be extended and enhanced to complete the enclosure of the site. Together this will reinforce the visual barrier with neighbouring villages so that the distance of separation between the easterly extent of the new residential area and westerly extent of Waldringfield, for example, would be more than 1km. The containment of woodland and trees also mitigates any impact on local areas with landscape designations.
- 2.9 The main Research & Development (R&D) site, Adastral Park, consists of a variety of office, industrial and research buildings and ancillary structures based on an ad hoc road system interspersed with landscape and car parking areas. It is dominated by the Orion Building and the Pegasus Tower. The whole is surrounded by a security fence with access restricted to one 24 hour access gate and a separate, time restricted access gate.
- 2.10 Most of the 117ha of land is relatively flat, low grade agricultural land with few features by way of field boundaries or other vegetation. There is a shallow valley running from the southeast corner of Adastral Park towards the south east. Part is used by BT as an aerial test range but this use is capable of relocation.
- 2.11 A significant part of the 117 ha is subject to sand and gravel extraction as part of a long term operation. The leases for this activity are nearing completion, and the extraction of material in the area with planning permission is nearly complete. The expansion of sand and gravel extraction as proposed in the Draft County Minerals Plan provides a unique opportunity to
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<sup>1</sup> Biggar Economics Report (2006)

reshape the land to provide an accessible, enhanced landscape and a setting for future development. There is an Site of Special Scientific Interest (SSSI) on site (which is a geological feature) that can be retained, interpreted and made publicly accessible either in its current location or a suitable alternative. There are a number of Scheduled Ancient Monuments that will also be preserved within green space within any development scheme.

- 2.12 The land is strategically located within the District and adjacent to the area's primary employer. It benefits from good existing links to Ipswich, Woodbridge and Felixstowe that have significant potential for further improvement.
- 2.13 There is already good access to the A12, the rest of the local highway network and beyond by car and bus. BT has launched a Green Travel Plan called Grass Routes for its own operations at Adastral Park that, amongst other proposals, aims to reduce the number of cars coming to Adastral Park.
- 2.14 There is an existing pedestrian and cycle bridge linking across the A12 into Martlesham Heath which can be improved, and there is potential for at least one more bridge.
- 2.15 The land is close to the new village of Martlesham Heath to the west, constructed contemporaneously with Adastral Park in the 1970s and 1980s as a model community, separated by the A12. There is a collection of older and more recent office buildings between Adastral Park and the A12, owned by Industrious (Dunedin), that include some of the original aerodrome buildings.
- 2.16 To the north the land borders Martlesham Heath Business Park, a mixed employment area with a collection of adapted RAF and purpose built industrial buildings, with more recent "bulky goods" retail buildings and a Tesco supermarket further north.
- 2.17 To the north east are two large mobile home parks developed in recent years, providing both holiday and permanent residential accommodation, interspersed with paddocks and areas of woodland between the land and Martlesham village.
- 2.18 The village of Waldringfield on the banks of the River Deben lies at least 1km to the east, with a Golf Course and small farmsteads and smallholdings at Waldringfield Heath on the boundary of the land.
- 2.19 To the south is Newbourne Road, beyond which is undulating open farmland and smaller areas of mature woodland that lie alongside a brook that flows towards Newbourne Springs and the village of Newbourne. To the southwest is a collection of farm buildings and small cottages that adjoin the land.

## 3.0 The Proposals

### The Vision

- 3.1 The overarching vision for Adastral Park and the additional land is set out in the *Design and Access Statement* submitted with this planning application. In summary, the concept includes:
- A regenerated Adastral Park to bring together BT, other information and communications technology companies and universities to develop new services and technologies
  - An East of England Development Agency (EEDA) supported Innovation Initiative – Innovation Martlesham - that will encourage and support new and developing businesses in the ICT sector located close to BT's operations
  - A strengthened role for Adastral Park as a major local employer through the creation of around 2000 new jobs, in addition to the 4000 jobs currently on site.
  - A new residential community in a sustainable location that is well related to existing communities and properly integrated with employment and other services
  - Opportunities for learning and education through both University teaching and research accommodation and schooling.
  - A richer mix of facilities and services for the communities of the Martlesham area as a whole, accessible to all
  - A revitalised Martlesham Heath Business Park providing modern premises in a high quality setting for a wide range of other businesses
  - An overall energy and sustainability strategy that minimises the adverse impact of the project on climate change, in a way that no other development site in the area can match.

## The submission

3.2 There are a number of reasons for submitting this planning application now:

*The proposals are in line with the emerging Local Development Framework which has been subject to public consultation and is at an advanced stage.*

3.3 Suffolk Coastal District Council have considered all options for growth in the district through the emerging Local Development Framework and have identified land, including land subject of this application, as the Council's preferred location for development.

3.4 The Council's emerging Core Strategy document has been subject of three periods of public consultation;

- Issues and Options (February 2007);
- Further Issues and Options (February 2008) and;
- Preferred Options (December 2008).

3.5 On the 28 July 2008, officers recommended Area 4, including Adastral Park, as their preferred location for development in the period to 2025 and beyond. This was endorsed by the LDF Task Group Committee and then Cabinet on 21 October 2008. The Core Strategy Preferred Options document, published for public consultation in December 2008, confirmed this as the Council's preferred approach.

3.6 This outline planning application is for land within the Council's preferred growth option; furthermore this land delivers all of the advantages and addresses all of the issues set out in the Core Strategy Preferred Options document.

3.7 The LDF Core Strategy is at an advanced stage of production, though it is still some way from being adopted as a formal development plan document. Paragraph 72 of Planning Policy Statement 3 states that Local Planning Authorities should not refuse applications solely on the grounds of prematurity. BT believes the advanced state of the emerging LDF policy allied with national and regional policy and thorough public consultation that it has undertaken make this a reasonable and appropriate time to submit the application.

*The LDF timetable has slipped and BT cannot wait until its adoption to pursue its goals*

3.8 The emerging LDF is fully supportive of the overarching vision of this application. However, the LDF production is a long process which 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. This includes the development of more jobs and homes both of which are requirements placed on SCDC by regional and central government.

***The proposals are supported by the adopted Regional Spatial Strategy (or East of England Plan) – the most up to date adopted part of the Development Plan***

- 3.9 The East of England Plan was adopted in May 2008. It set development targets from 2001 to 2021, and we are already eight years into the RSS plan period, and the targets should be being delivered. The RSS, supported by revised Planning Policy Statements, represents the most up to date element of the Development Plan for Suffolk Coastal District. The East of England Plan requires the delivery of both jobs and homes in the Ipswich Policy Area. This planning application provides both.

***The proposals are comprehensive and meet the aims of national planning policy***

- 3.10 Paragraph 69 of Planning Policy Statement 3 states that:

*“In general, in deciding planning applications, Local Planning Authorities should have regard to:*

- *Achieving high quality housing.*
- *Ensuring developments achieve a good mix of housing reflecting the accommodation requirements of specific groups, in particular, families and older people.*
- *The suitability of a site for housing, including its environmental sustainability.*
- *Using land effectively and efficiently.*
- *Ensuring the proposed development is in line with planning for housing objectives, reflecting the need and demand for housing in, and the spatial vision for, the area and does not undermine wider policy objectives eg addressing housing market renewal issues.”*

- 3.11 The proposals meet all of these requirements.

***BT can provide SCDC with reassurance and confidence that the Adastral Park proposals meet their aims.***

- 3.12 This planning statement, supported by the other documents accompanying the planning application are a demonstration of how the proposals have been formulated to meet the Council’s aims. In addition, BT first discussed the possibility of these proposals with the Council in 2006. Since then it has engaged a technical team of specialists to develop proposals and engage with the community and other stakeholders. All concerns and issues that have been identified have been examined and where appropriate incorporated into the plan.

***BT can assist the local authority in delivering their 5 year supply requirements***

- 3.13 One of the realities of the present market is that housing developers are not bringing forward development sites, land owners are reluctant to sell because values have reduced, and developers are not purchasing land for development because of the uncertainty about mortgage availability and the effects on prospective buyers and house prices. This may be a short term issue in the context of a 15 year LDF, but this is uncertain. What is more certain is that the application site is within the ownership of and control of BT, that the site offers a comprehensive scheme of development that integrates jobs, homes, facilities and services, that as the market improves, BT

is willing and able to bring forward its site for development at the earliest opportunity, and such sites are likely to receive early investment .

***There is considerable uncertainty created by Local Government review that may prejudice the LDF programme in particular and decision making in general for an important period ahead***

- 3.14 There is no doubt that boundaries and Local Government structures will be revised and that work to date on the LDF process in each of the current Council areas will not readily adapt to these new structures, particularly when adjoining authorities have such differing planning approaches. The requirement for housing and jobs will not disappear after Local Government review but a different set of people, perhaps located further away than Woodbridge and without the benefit of a continuous involvement in the issues would be examining the proposals. BT believes that SCDC are best placed to determine this application.

***The proposals have evolved since September 2008.***

- 3.15 Following submission of the first planning application in September 2008, BT received comments from Suffolk Coastal District Council, statutory consultees and local residents which have prompted to an evolution of to the site layout. BT believes that the changes made are a positive improvement to the proposals, borne out of consultation. As a result, BT has taken the decision to withdraw the first application and submit this revised application.
- 3.16 The changes and their rationale are described in detail in the Design and Access Statement.

## Explanation of Proposals

### Employment

- 3.17 The majority of the buildings within Adastral Park were built as laboratories. These reflect the technological demands and aspirations of BT through the second half of the twentieth century. Technology has moved on and the Adastral Park of the 21<sup>st</sup> Century has a very different operational requirement from its buildings, one that is based more around office space and the use of computers. The layout of former laboratories and their associated buildings do not always permit ideal space for the new activities to be undertaken within the buildings. They do not meet the modern high specifications which occupiers demand. The use of the space within buildings is largely inefficient and they would not meet modern day Building Regulation standards. The buildings have poor energy performance. In addition, the existing layout of Adastral Park results in significant areas of poorly utilised space.
- 3.18 BT seeks to provide refurbished and new buildings which meet the requirement of its existing and future projected development and growth. Through redevelopment, BT's existing operations on Adastral Park can consolidate into less floorspace.
- 3.19 A strategic regional and local objective is the retention and growth of high quality jobs. BT's contribution to the regional economy is calculated to be in excess of £800M every year through Adastral Park1, which currently provides jobs for around 4,000 people. The nature and scale of BT's R&D operation, related to the 21<sup>st</sup> Century Network and to other groundbreaking work, means that funds need to be protected for R&D and cannot easily be diverted into property renewal. However, Adastral Park has been in operation for nearly 40 years and the buildings need to be refreshed through refurbishment and redevelopment. To benefit from the current technology advances being driven from Adastral Park, a commitment to a comprehensive programme is needed very soon. This requires an injection of new capital which could come through land sales for residential development. Without such a mechanism, BT's role at the forefront of R&D in the region may be at risk. BT is a global company operating in many different markets with almost a third of its workforce now outside the UK.
- 3.20 The gradual or sudden withdrawal of BT's R&D activities would have a significant negative impact for the Eastern Region, and could involve the loss not only of BT jobs but jobs in all of its dependent suppliers in the Ipswich area. In addition, without the BT catalyst, there would be significant doubts over the feasibility of the Innovation Park, and the impact on local confidence would diminish the area's attraction to other potential inward investors.
- 3.21 With a capital investment flow available, Adastral Park has the potential to be regenerated to secure its position at the forefront of 21<sup>st</sup> Century R&D in information and communications technology. Regeneration of Adastral Park could provide capacity for the creation of around 2,000 jobs as part of a truly sustainable community.

- 3.22 Development capacity analysis has identified that an additional 60,000 sqm of B1 employment floorspace, related car parking spaces and landscaping could be created within Adastral Park as part of a refurbishment and redevelopment programme. This amount of floorspace equates to approximately 2,000 additional jobs. Some of this additional floorspace may be required by BT and some will enable other companies to locate on site or existing companies to expand. This would also make provision for the full Innovation Martlesham concept.
- 3.23 Innovation Martlesham is a proposal to facilitate a high-tech business cluster. The Innovation Park has the support of the East of England Development Agency, Suffolk County Council and Suffolk Coastal District Council (SCDC). It is referred to specifically in the Regional Spatial Strategy and the Regional Economic Strategy. Previous proposals to locate the new development on greenfield land south of Adastral Park failed and so BT is now facilitating the development of Innovation Martlesham on its own land. Innovation Martlesham is starting within existing buildings at Adastral Park. Sites for purpose-built new buildings and the adaptation of other existing buildings will be the next phase, but this requires substantial investment to release and service sites that is not yet fully funded.
- 3.24 This planning application proposes the regeneration of Adastral Park through refurbishment and redevelopment of some of the existing 130,000 sqm of accommodation, and new development of up to **60,000 sqm net additional employment floorspace**, related car parking spaces and landscaping (B1).

### Homes

- 3.25 In addition to generating revenue to redevelop Adastral Park, BT wants to create homes near its research centre so that people have a greater opportunity in the local housing market to choose to live very near to work in high quality, energy efficient and sustainable homes. This will be a critical part of the attraction to talented people to carry out research at Adastral Park, for BT and for other companies.
- 3.26 BT proposes the development of up to 2,000 homes on land adjacent to Adastral Park to the east and south in the plan period to 2025.
- 3.27 Among other things, sustainable development means connecting where people live to where people work – giving people choice about how they balance their home and work lives. Ultimately, this is a behaviour choice but, effectively planned and intelligently designed, communities can encourage and promote more sustainable ways of living. At Adastral Park, BT believes that it can deliver something special and remain involved in it for the long term.
- 3.28 For BT, sale of land for these new homes will fund the redevelopment of Adastral Park - refurbishing existing buildings and building new ones to facilitate the creation of around 2,000 new jobs.

- 3.29 On a national stage, the Government has set a house building target of at least 3 million new homes by 2020 and every part of the country has a role to play. New homes are needed in Suffolk and decisions are being made by the relevant local authorities - in consultation with local people - about where housing development should happen. The Regional Spatial Strategy has set minimum targets and the local councils now need to decide how this requirement is to be satisfied.
- 3.30 Suffolk Coastal District Council (SCDC) has calculated that it needs to find land for 1050 homes east of Ipswich in the next plan period to 2025. This is a difficult scale of development that does not readily support a range of services and facilities. Although BT proposes 2,000 homes, the land has capacity for up to 2,500 homes which could meet part of Suffolk Coastal District Council's housing requirements in the long term, beyond the next plan period. At this stage, BT is looking for a commitment for up to 2,000 homes over the plan period to 2025.
- 3.31 This size of development is also required to support a range of local facilities and services to enable full integration with the locality and reliance on existing communities and infrastructure, including:
- A new primary school. The threshold to support a two form entry school is 1,800 to 2,000 households.
  - Health and welfare services such as doctors, dentists.
  - Social facilities such as a meeting hall and good public open space;
  - A local centre with a small retail presence meeting local needs;
  - Enhanced public transport services.
- 3.32 Providing land for fewer than 2,000 dwellings in any one location, at Adastral Park or elsewhere, constrains the range and viability of the social infrastructure that can be provided. For example, it means a new primary school may not be deliverable. The pressure on existing infrastructure of a lesser development would be significant and in all areas there are local capacity issues.
- 3.33 Residential development at Adastral Park would make a significant proportion of the new homes affordable for local people in line with the emerging Local Development Framework (LDF) requirements, enabling Martlesham to continue to grow in a sustainable and inclusive way.

### **Mixed Use Local Centre**

- 3.34 As introduced above, a development of up to 2,000 homes alongside employment growth has the potential to support all the elements that help to make a community sustainable. In particular it would sustain the development of a local centre to serve the proposed and existing communities. A local centre is proposed to comprise some or all of the following land uses:
- Health care provision;
  - Community centre;

- Local scale shops;
- Café and/or restaurant
- Public House;
- Food takeaway.

3.35 This would comprise facilities and services to meet the day-to-day demands of the living and working population. It would include:

### **Health Care Provision**

3.36 BT has consulted Suffolk Primary Care Trust in the formulation of these proposals. The PCT has confirmed that development of this scale would require additional doctors and dentists. BT has included a site for a health centre as part of the application. Any contribution toward the funding and provision of the facility would be dealt with under a Section 106 Agreement between BT and the District Council.

### **Education**

3.37 A culture of learning is at the heart of Adastral Park. From the early days when BT pioneered fibre optic cables and the first digital telephone exchange, to more recent breakthroughs like Internet technologies, Adastral Park has a proud history of innovation, backed by skills and learning.

3.38 By redeveloping the Park in a comprehensive master plan - which provides a clear structure of what might be developed here - BT hopes to foster this spirit of learning and encourage more partners to come to Adastral Park.

3.39 Today, alongside a wide range of education initiatives and outreach programmes, BT is proud that Suffolk New College, the University of Essex, University of East Anglia and University College London all have a presence at the Park, and BT works closely with University Campus Suffolk and Suffolk New College. Land and buildings and flexibilities in the plan have been identified to allow the expansion of the university presence at Adastral Park.

### *Primary School*

3.40 The plans for Adastral Park include provision of land for a new Primary School (age 5-11, 420 place, 2 form entry [FE]) on a site of two hectares. BT has consulted the County Council who have confirmed that this is appropriate to the scale of development and to the location, taking account of existing primary school provision and future school rolls in the area.

3.41 Primary Schools in surrounding villages such as Waldringfield have falling school rolls.

### *Secondary School*

3.42 Secondary schooling is significantly more complicated. The proposed development at Adastral Park will create a demand for secondary school places, but would not itself require a new school.

It is generally expected that 5,000 dwellings equate to the need for the construction of a new school. However, it is known that the capacity of the two existing schools in the area – Kesgrave and Farlingaye – is stretched and will continue to be so for the foreseeable future, that there are existing and planned households within the existing catchments whose needs cannot be met by the existing schools, and that there is insufficient capacity for all of the secondary age pupils that will be generated by this the new development to be accommodated locally. The County Council has calculated that there is already a shortfall in capacity to meet the needs of up to 1500 households homes in the East Ipswich area, and that the threshold for a new school is therefore reduced from the normal 5000 homes to 3500.

3.43 It is also known that the two schools that serve North Ipswich - Northgate and Thurleston – are at or near capacity and are faced with the prospect of new development on the Northern Fringe of 1000 to 3000+ new homes by way of impending planning applications and provisions in the Ipswich LDF.

3.44 There is a need for a comprehensive review of the provision of secondary schooling across north and east Ipswich to include provision for at least one new school. This would be accompanied by a rearrangement of notional catchment populations served.

3.45 BT has explored the options open to the County Council to resolve education on a local and County level. One approach could be to locate a secondary school on Adastral Park., though BT do not believe Adastral Park represents the best location for a school which will serve a much wider catchment. At the very least the County will seek a financial contribution to provide facilities elsewhere by way of a Section 106 agreement.

3.46 Providing a secondary school on land at Adastral Park is not straight forward:

- The complications of **phasing** mineral extraction alongside development mean that it is difficult to define the right site to meet County criteria that is available in the right location at the right time, particularly if the objective is to have a site available early in the development process.
- The land available and suited to provision of a secondary school is located to the east or south of the site, neither of which is ideally accessible to a **wider catchment** and would be more likely to attract car trips. Both locations are also peripheral to the wider community to be served. Land to the east is only accessible through the employment area; land to the south is best accessed through the employment area or from the Foxhall junction on the A12 and would be the most remote from other parts of the potential catchment population.
- There are **potential traffic conflicts** if a secondary school is located close to a major concentration of employment activity. Both would attract traffic to the site during the morning peak increasing the pressure on the same adjoining junctions. A location closer to other residential communities and away from employment would generate trips that are a counterflow to employment trips and therefore less in conflict.

- To provide 2000 homes in this location with a secondary school would require the **density of the site to rise**. The higher the density the greater the number of flats and smaller homes that will be delivered. However, it is family housing that is sought to meet demand in the district and that which is required to attract and retain the highest calibre workforce at Adastral Park.

3.47 BT's own analysis suggests that a secondary school located on the **south side of the village of Martlesham** offers greater potential:

- It would be equidistant between the two existing schools in Kesgrave and Woodbridge. This would facilitate a reorganisation of notional catchment areas.
- It would be accessible to a wide existing and future catchment population using existing roads and enhanced walking and cycle routes. There is an existing footpath which runs from the pavement and cycle lane on Felixstowe Road to Spratts Plantation. This is partly a right of way and partly in BT's ownership and has potential to become a pedestrian and cycleway linking a school site to development to the south.
- It would be located away from any concentration of employment minimising traffic conflicts in the morning peak.

3.48 BT is committed to assisting the County to deliver a viable solution to meet the demands generated by this site. **This revised application includes sufficient flexibility to allow a secondary school to be delivered as part of the proposals.** This could include the sharing of playing fields with the primary school and/or those provided separately for the development as a whole.. The impact of a secondary school has been tested through the Environmental Statement and Transport Assessment.

3.49 It is now for the County Council and Suffolk Coastal District Council, with input from BT as landowner, to determine whether Adastral Park is the best location or whether land elsewhere is a better option.

### **Hotel**

3.50 Business at Adastral Park and local tourism has created a significant unmet demand for hotel accommodation. BT has identified a site and hotel operator who can deliver a hotel within Adastral Park to support business activities, conferences and other social functions. This would meet a long held aspiration of Suffolk Coastal District Council.

### **Energy Centre**

3.51 Adastral Park is a significant consumer of power. BT has started the process of producing its own power on site to reduce its reliance on the grid for environmental and power security reasons. A logical step for the proposed redevelopment and the construction of new homes and other development is to create a central energy centre. This energy centre could power, heat and cool the organisations and homes on site in a highly efficient manner, in part through the use of renewable energy.

- 3.52 A number of options have been examined to allow centralised heat and power to serve the existing and proposed employment floorspace and homes. They are explored further in the *Energy and Carbon Strategy*. An energy centre is a promising option which could be pursued.

### **Public Open Space**

- 3.53 Adastral Park has always benefited from substantial areas of open space. However, it is under used and has not been available to the general public. BT's proposals include substantial areas of public open space including formal open space provision for recreation and play. The planning application includes the provision of a large central public park around which homes and jobs would be focused. Provision has been made for Local Equipped Area of Play (LEAP) and Neighbourhood Equipped Area of Play (NEAP). This would be a unique feature of the development that follows the precedent set in Martlesham Heath.
- 3.54 The development is proposed to be structured around landscaped boulevards and streets as beautiful spaces that also provide access and utility services for the development. Substantial areas of new woodland are proposed alongside existing areas which will enhance visual buffers within and around the perimeter of the land. The revised application includes the provision of a new and significant landscape buffer to land to the east and south-east.
- 3.55 A formal Outdoor Playing Space Statement is included within the *Design and Access Statement*.

### **Transport**

- 3.56 The proposals for transport can be found in the *Design and Access Statement* and *Transportation Statement*. In summary, the proposals include a primary access route through the site for pedestrians, cyclists, buses and cars connecting three main access points. Additional footpaths, cycle routes and minor roads are identified in the illustrative master plan.
- 3.57 The proposals include full provision for the operation of bus services through the development. Potential sites for bus stops have been identified which would result in a walk of no more than 400 metres for all those living and working on the site.
- 3.58 The application includes detailed design of the changes to junctions on the A12 as required by the County Council as well as the provision of access points onto Newbourne Road connecting to the A12 and the Foxhall roundabout.

### **Evolution of the Proposals and Community Consultation**

- 3.59 The proposals have evolved over time and through public and stakeholder consultation. This is documented within the *Statement of Community Engagement* and the *Design and Access Strategy*.

### **Beyond 2025**

- 3.60 BT's land holdings have potential for a further 500 homes (approximately) beyond 2025 on land identified as "temporary open space" in this application. BT is **not** applying for residential

development of this land at this time. Should development be sought in the future then it would be the subject of a separate planning application at that time which will include public consultation according to the requirements of the planning system that then apply.

## 4.0 Planning Policy Context

- 4.1 The local planning authority, which in this case is Suffolk Coastal District Council, must determine planning applications in accordance with the statutory development plan unless material considerations indicate otherwise.
- 4.2 Major residential development of land at Adastral Park is not currently provided for within the adopted development plan. However, the fact that it is not within the adopted development plan does not prevent consideration of an application for development. As the existing development plan does not allocate the land for housing, it is incumbent upon the applicant to provide material considerations and evidence to indicate why such development should be approved.
- 4.3 Planning Policy Statement 1 (PPS1) reflects the fact that there is a hierarchical structure of guidance and plans covering national, regional and local planning. That includes national Planning Policy Statements and guidance notes, Regional Spatial Strategies together with Local Development Frameworks. At this stage there is no Local Development Framework serving this area and therefore unless and until there is one the material issues are:
- national policy;
  - regional spatial strategies and then;
  - saved policies from the former local plan.
- 4.4 The Local Plan was adopted back in 2001 and therefore the weight to be attributed to it is reduced as a consequence of the passage of time, and changing national and regional targets and policies. In comparison with that, more recent national planning statements and guidance are stating quite clearly that there is a wish to see development of housing and employment brought forward. In various Prime Ministerial and Ministerial statements there has been a wish to see economic growth and prosperity through new housing and employment opportunities, and that this should not be frustrated by any delays in the preparation of Local Development Frameworks. That is further evidenced by the evolving regional spatial strategy where employment and housing growth have been identified specifically for the Suffolk Coastal District area, and in particular the Ipswich Policy Area, which in the case of SCDC means east of Ipswich.
- 4.5 It is on this basis that the proposals are tested against planning policy.

### National Policy Context

#### **Planning Policy Statement 1: Delivering Sustainable Development (January 2005)**

- 4.6 Planning Policy Statement 1 (PPS1) establishes the overarching objectives of land use planning in facilitating and promoting sustainable and inclusive patterns of urban and rural development. It was published in January 2005. PPS1 outlines key principles which should be applied to ensure development plans and decisions on planning applications contribute towards the delivery of sustainable developments. These include: creating socially cohesive and inclusive communities;

protecting and enhancing the environment; prudent use of natural resources; and, promoting sustainable economic development.

- 4.7 Additionally, PPS1 emphasises the role of good design in creating attractive, durable and adaptable places. The document states that good design should address the connections between people and places of work and other key services; be integrated into the existing urban form and the natural and built environments and should be an integral part of the processes for ensuring successful, safe and inclusive villages, towns and cities.
- 4.8 PPS1 also sets out requirements to consult and engage with the public and stakeholders. This is examined in greater detail in the *Statement of Community Engagement*.
- 4.9 The Adastral Park development therefore accords with the sustainable principles of PPS1 through:
- creation of a comprehensively planned and designed sustainable urban extension providing residential, employment, retail, health and community services and facilities;
  - services, facilities and a range of public open spaces;
  - promotes the more efficient use of land through development at average net densities above 30 dwellings per hectare (further density analysis can be found in the *Design and Access Statement*);;
  - the creation of a development form and structure that reduces the need to travel by private car and encourages sustainable modes of travel;
  - a development framework that utilises principles of good urban design; and
  - the provision of Sustainable Urban Drainage Systems (SUDS) for flood alleviation.

#### **Supplement to Planning Policy Statement : Planning and Climate Change (December 2007)**

- 4.10 Planning and Climate Change sets out how planning, in providing for the new homes, jobs and infrastructure needed by communities, should help shape places with lower carbon emissions and resilient to the climate change now accepted as inevitable.
- 4.11 Paragraph 9 of the document states that all planning authorities should prepare, and manage the delivery of, spatial strategies that:
- *“make a full contribution to delivering the Government’s Climate Change Programme and energy policies, and in doing so contribute to global sustainability;*
  - *in providing for the homes, jobs, services and infrastructure needed by communities, and in renewing and shaping the places where they live and work, secure the highest viable resource and energy efficiency and reduction in emissions;*

- *deliver patterns of urban growth and sustainable rural developments that help secure the fullest possible use of sustainable transport for moving freight, public transport, cycling and walking; and, which overall, reduce the need to travel, especially by car;*
- *secure new development and shape places that minimise vulnerability, and provide resilience, to climate change; and in ways that are consistent with social cohesion and inclusion;*
- *conserve and enhance biodiversity, recognising that the distribution of habitats and species will be affected by climate change;*
- *reflect the development needs and interests of communities and enable them to contribute effectively to tackling climate change; and*
- *respond to the concerns of business and encourage competitiveness and technological innovation in mitigating and adapting to climate change.”*

4.12 The evolution of this planning application has been informed by the objectives contained with the supplement to PPS1. BT’s approach is detailed in the *Sustainability Assessment and Carbon and Energy Strategy* submitted in support of this application, along with detailed proposals contained within the *Transport Assessment and Environmental Impact Assessment*.

### **Planning Policy Statement 3: Housing (November 2006)**

4.13 Planning Policy Statement 3 (PPS3) was published in 2006, five years after the adoption of the Local Plan. It reflects the Government’s commitment to improving affordability and supply of housing in all communities (Para 3). It advocates that housing development should be in “*suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure*”.

4.14 The Adastral Park development therefore accords with the sustainable principles of PPS3 through:

- a location adjacent to the District’s primary employer and the proposed identification of land to deliver around 2,000 jobs;
- the provision of a range of housing types and tenures;
- providing a local centre to meet everyday social and leisure needs;
- providing land for healthcare facilities and a new primary school;
- the creation of an accessible development with public transport, pedestrian and cycleway links as well as road access.

4.15 The issue of housing need and numbers is dealt with in chapter x of this statement.

#### **Planning Policy Guidance 4: Industrial, Commercial and Small Firms (November 1992)**

- 4.16 Planning Policy Guidance 4 (PPG4) takes a positive approach to the location of new business developments and assisting small firms through the planning system. The main message is that economic growth and a high-quality environment have to be pursued together.
- 4.17 One of the Government's key aims is to encourage continued economic development in a way which is compatible with its stated environmental objectives. Economic growth and a high quality environment have to be pursued together. The Environment White Paper "This Common Inheritance" emphasised this relationship when it said that *"Economic growth is not an end in itself. It provides us with the means to lead better and fuller lives. There is no contradiction in arguing both for economic growth and for environmental good sense. The challenge is to integrate the two."*

#### **Planning Policy Statement 7: Sustainable Development in Rural Areas (August 2004)**

- 4.18 Planning Policy Statement 7 (PPS7) Sustainable Development in Rural Areas seeks:
- (i) To raise the quality of life and the environment in rural areas through the promotion of:
    - thriving, inclusive and sustainable rural communities, ensuring people have decent places to live by improving the quality and sustainability of local environments and neighbourhoods;
    - sustainable economic growth and diversification;
    - good quality, sustainable development that respects and, where possible, enhances local distinctiveness and the intrinsic qualities of the countryside; and
    - continued protection of the open countryside for the benefit of all, with the highest level of protection for our most valued landscapes and environmental resources.
  - (ii) To promote more sustainable patterns of development:
    - focusing most development in, or next to, existing towns and villages;
    - preventing urban sprawl;
    - discouraging the development of 'greenfield' land, and, where such land must be used, ensuring it is not used wastefully;
    - promoting a range of uses to maximise the potential benefits of the countryside fringing urban areas; and
    - providing appropriate leisure opportunities to enable urban and rural dwellers to enjoy the wider countryside.
- 4.19 The Adastral Park development accords with the sustainability principles of PPS7 through:
- providing housing to meet District demand and to meet District needs;
  - providing jobs to meet District demand and to meet District requirements;
  - providing jobs and homes adjacent to one another;

- focusing development on a site damaged by quarrying rather than any other greenfield location. Although the area to be developed for housing and associated land uses remains classified as a greenfield site by virtue of restoration conditions in the planning permission, all of the land is either being worked for aggregates, or is identified in the Minerals Local Plan as a preferred option for aggregates extraction;
- developing outside of any local or national areas of landscape designation;
- developing adjacent to the existing community of Martlesham Heath and the adjacent retail centre east of the A12;
- promoting the more efficient use of land through development at average net densities above 30 dwellings per hectare; and
- opening up land which is not publicly accessible and providing a large central park for the wider community to enjoy.

### **Planning Policy Guidance 13: Transport (March 2001)**

4.20 Planning Policy Guidance 13 (PPG13) emphasises the role of land use planning in delivering an integrated transport strategy. The prime objectives of PPG13 seek a closer correlation between land use planning and transport in order to achieve:

- the promotion of more sustainable transport choices for both people and the movement of freight;
- the promotion of accessibility to jobs, shopping, leisure facilities and services;
- by public transport, walking and cycling; and
- a reduction in the need to travel.

4.21 The planning application seeks to achieve these aims by:

- providing jobs and homes adjacent to one another;
- defining a primary transport route which would allow the entire site to be served by public transport;
- no one living or working on the site more than 400 metres from a bus stop;
- providing a range of land uses on site; and
- creating an environment in which walking and cycling is an attractive option.

### **Planning Policy Guidance 15: Planning and the Historic Environment (September 1994) and**

### **Planning Policy Guidance 16: Archaeology and Planning (November 1990)**

4.22 Planning Policy Guidance 15 (PPG15) establishes the role of planning in the preservation of the historic buildings and conservation areas.

4.23 Planning Policy Guidance 16 (PPG16) provides the Government's principles on the preservation and recording of archaeological remains. Paragraph 8 states that "*where nationally important archaeological remains, whether scheduled or not, and their settings, are affected by proposed development there should be a presumption in favour of their physical preservation*". The guidance also emphasises the role in

undertaking pre-application assessment as to whether archaeological remains exist on site and the implications for the development proposal. Paragraph 21 goes on to state; “*where early discussions with local planning authorities or the developer’s own research indicate that important archaeological remains may exist, it is reasonable for the planning authority to request the prospective developer to arrange for an archaeological field evaluation to be carried out before any decision on the planning application is taken*”.

- 4.24 Constituting an element of the Environmental Impact Assessment, a desk-top archaeological analysis has been undertaken. Desk based research comprised analysis of relevant information contained in and provided by the Suffolk County Sites and Monuments Records; documentary and cartographic searches of relevant material in published sources were undertaken at the Suffolk Record Office and other library sources. Information about Scheduled Ancient Monuments, Registered Battlefields and Registered Parks and Gardens was obtained from English Heritage.
- 4.25 Although the site contains no listed buildings, there are buildings of historic interest which have been recorded and one of which BT has put back into use through the development of Innovation Martlesham. This building has been sympathetically restored in line with its original RAF heritage.
- 4.26 The land also contains a number of Scheduled Ancient Monuments. All of these are preserved within the illustrative master plan for the site.

### **Planning Policy Statement 9: Biodiversity and Geological Conservation (August 2005)**

- 4.27 Planning Policy Statement 9 (PPS9) formulates the Government’s objectives for biodiversity and geological conservation and outlines the framework for the safeguarding of flora and fauna under national and international law. Paragraph 9 acknowledges the important contribution of locally-designated conservation areas, such as wildlife corridors, to nature conservation. Equally, it indicates that the sensitive landscaping and management of wildlife corridors within a development can contribute significant ecological benefits.

#### *Site of Special Scientific Interest*

- 4.28 The site benefits from one geological Site of Special Scientific Interest. It is not currently publicly accessible. BT are liaising with Natural England to identify whether the geological phenomenon is evident elsewhere across the site. If it is, and it is appropriate, a new geological face may be opened up in a location which will permit easier access and management. Development of the land would allow appropriate public access and interpretation.

#### *Area of Outstanding Natural Beauty*

- 4.29 The proposals are not within the Area of Outstanding Natural Beauty (AONB). The site is located adjacent to the AONB on a low, gently undulating plateau which is characteristic of this part of the county. As a result, it is relatively elevated, and there is a potential for the visual

influence of any development to extend into the surrounding area, including the AONB. However, the tallest existing buildings within Adastral Park are already visible from within the AONB (e.g. from the eastern side of the Deben estuary), and the proposals are unlikely to change or to challenge the visual impact of this.

- 4.30 In practice, however, this visibility is highly constrained by landscape features, notably the woodlands and shelterbelts (many of which are wholly or partly non-deciduous and therefore effective year round) that are also characteristic of the area. With tree cover retained and new areas planted, the visual impact would be limited and new development is unlikely to form a skyline feature.

#### *Special Protection Area*

- 4.31 The Deben Estuary is a Special Protection Area notable for its wading birds. BT has consulted with Natural England on the proposals who have indicated that they consider that this development has no significant impact on the SPA. An *Appropriate Assessment* is therefore not required.

#### **Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation (July 2002)**

- 4.32 Well designed and implemented planning policies for open space, sport and recreation are fundamental to delivering the broader Government objectives including: supporting urban renaissance, promoting social inclusion, health and wellbeing and the promotion of sustainable development. The guidance addresses the issues of maintaining an adequate supply of and adequate provision of open space and recreational sports facilities. In addition, guidance is provided on planning for new open space and sports recreational facilities.
- 4.33 The planning application includes a 13 hectare central park in which formal and informal play space is provided. A further 3.8 hectares is proposed. In addition four LEAPS and one NEAP are proposed. A formal Outdoor Playing Space Statement is included in the *Design and Access Statement*.

#### **Planning Policy Statement 22: Renewable Energy (September 2004)**

- 4.34 Planning Policy Statement 22 (PPS22) echoes the renewable energy policies as set out in the Energy White Paper (“Our energy future – creating a low carbon economy”, February 2003) and establishes key principles that regional planning bodies and local planning authorities should adhere to when planning for renewable energy. Accompanying the planning application is a *Carbon and Energy Strategy*. This document addresses these specific issues and their intrinsic relationship with the development.

#### **Planning Policy Statement 23: Pollution Control (November 2004)**

- 4.35 PPS23 is intended to complement the pollution control framework under the Pollution Prevention and Control Act 1999 and the PPC Regulations 2000. The technical issues that

PPS23 guides have been examined through the *Environmental Impact Assessment*.

#### **Planning Policy Guidance 24 Planning and Noise (September 1994)**

- 4.36 Planning Policy Guidance 24 (PPG24) outlines that the impact of noise can be a material consideration in the determination of planning applications. The planning system has the task of guiding development to the most appropriate locations and outlines the importance of siting new development involving noisy activities, if possible, away from noise-sensitive land uses.
- 4.37 PPG24 also introduces the concept of Noise Exposure Categories (NECs), ranging from A-D, to help local planning authorities in their consideration of applications for residential development near transport-related noise sources. Category A represents the circumstances in which noise is unlikely to be a determining factor. Categories B and C deal with situations where noise mitigation measures may make development acceptable, while Category D relates to the situation in which development should normally be refused.
- 4.38 A noise assessment has been undertaken as part of the *Environmental Impact Assessment*.

#### **Planning Policy Statement 25: Development and Flood Risk (Dec 2006)**

- 4.39 The Government's aim is to reduce the risks to people and the developed and natural environment from flooding. The guidance aims to strengthen the co-ordination between land use and development planning and the operational delivery of flood and coastal defence strategy. The guidance states that the susceptibility of land to flooding is a material consideration in the determining of planning applications. In preparing their proposals, applicants should discuss with the local planning authority the requirements they will be expected to meet to satisfy the authority on flood risk and the run-off implications of the development proposed. In addition, Paragraph 60 states that the Environment Agency should be consulted on the potential risks to any development proposals.
- 4.40 The site does not fall within an area of flood risk. Given the scale of the proposed development a Flood Risk Assessment has been undertaken which seeks to mitigate against any possible impacts emerging from the development of the land. Please refer to the *Flood Risk Assessment* for further information.

#### **Prime Ministerial and Ministerial Statements**

- 4.41 Since 2007, a number of statements have been made by the Government about the requirement for economic growth and prosperity and the requirement for additional houses to be built. Indeed, the figure of 3 million houses to the year 2021 has been quoted by the Prime Minister as being required. Accessible, affordable and high quality housing to meet an increasing rate of household formation is a clear Government priority.
- 4.42 Ministers have identified 50 growth areas and growth points, the first of which were originally identified in 2006. Finance has been made available to local authorities where those local

authorities have growth towns or cities within them in order to deal with infrastructure or other challenges which would otherwise inhibit the growth of those towns and cities. The Haven Gateway, which includes Suffolk Coastal District, is an East of England Growth Point.

- 4.43 Ministers have made statements promoting affordable housing and the wish to see brownfield sites developed as a starting point. There is an acknowledgement, however, that not all land on which development is required would be brownfield and that greenfield sites will also be needed.
- 4.44 Ministers have confirmed on a regular basis their support for sustainable housing and in particular, are seeking improvements to the construction of housing to meet sustainability standards, possibly up to Code 6. The code criteria reflect not just the construction of the homes but also the sustainability factors which service them, i.e. heating systems.
- 4.45 The majority of the site being within single ownership means that the proposals are deliverable and risks in identifying the site for development are minimised. It is not speculative; which meets Ministerial and policy assumptions of giving planning permission to sites for development which can actually be developed.

### **National Planning Policy – Summary**

- 4.46 The above assessment has shown how the proposals comply with the aim of national planning policy. National planning policy statements and guidance, along with Ministerial statements are wholly supportive of the proposals that are put forward within this planning application.

## 5.0 Employment

- 5.1 To assist in the assessment of the proposals against Regional and Local Planning Policy the remainder of this chapter takes the two primary elements of the application, namely the delivery of jobs and housing, and assesses them against policy.
- 5.2 This planning application proposes the regeneration of Adastral Park through refurbishment and redevelopment of some of the existing 130,000 sqm of accommodation, and new development of up to **60,000 sqm net additional employment floorspace**, related car parking spaces and landscaping (B1).

### Regional Spatial Strategy

- 5.3 The East of England Regional Assembly has prepared a *Regional Spatial Strategy* (RSS) for the East of England called the *East of England Plan*. The East of England Plan was adopted by the Secretary of State in May 2008.
- 5.4 In the RSS, Martlesham is within the Haven Gateway sub-region. The policy sets a target of not less than 50,000 additional jobs in the Haven Gateway for the period 2001-2021. When broken down to the District level this results in 30,000 additional jobs in the Suffolk part (Policy E1).
- 5.5 Job growth at Adastral Park is placed firmly as a priority for the Haven Gateway through Policy HG1: Strategy for the Sub-Region where it states that “*The sub-regional strategy aims to achieve transformational development and change throughout Haven Gateway which will develop the diverse economy of the sub-region, including provision for the needs of an expanding tourism sector, support for the establishment and expansion of ICT clusters...*”
- 5.6 Policy E3 - Strategic Employment Sites goes on to recognise the role of ICT within Haven Gateway and indicates that sites for employment should be provided particularly in such strategic locations. Paragraph 13.30 states that “*the economic structure of the area is diverse, principally based on...established and expanding ICT clusters including Adastral Park at Martlesham and its proposed innovation centre...*”. Policy E4 – Clusters states that “*Local Development Documents should support the sustainable and dynamic growth of inter-regional and intra-regional sectors and business clusters including...the ICT/telecommunications cluster around Ipswich*”.

### Haven Gateway

- 5.7 Haven Gateway Partnership was launched in 2001 and brings together the ports of Felixstowe, Harwich, Ipswich, Mistley and their surrounding hinterlands including the regional centres of Colchester and Ipswich. Based on Haven Ports' role as generators of economic activity, Haven Gateway Partnership provides a context within which partners from the private and public sectors can work together to promote economic opportunities and secure the future prosperity of the sub-region. The Partnership, which includes the local authorities, the Ports, the East of England Development Agency and BT, works closely with existing organisations and operates as an unincorporated association.

- 5.8 The Partnership strongly supports the growth in housing and employment proposed in the emerging Regional Spatial Strategy. It has produced and adopted a Framework for Growth. While being anchored in the RSS, the Framework does not duplicate national or regional planning guidance. Neither does it establish strategy and policy in its own right, or take the place of statutory planning guidance in the RSS and Local Development Frameworks (LDF). The emphasis is on the effective implementation of planned growth. However, the Framework is intended to assist the LDF process, in particular by providing a steer on key issues which have a cross-boundary dimension within the Gateway.
- 5.9 The Haven Gateway was awarded New Growth Point Status by the Government in 2006 in recognition of its ambitious housing targets set out in the RSS. The Framework for Growth and the associated Programme of Development are also intended to meet the requirements of the Department of Communities and Local Government for funding support, by describing the measures needed to deliver that growth in a sustainable way. The RSS specifies that regionally strategic employment sites should be provided at Ipswich, Felixstowe, Colchester and Harwich. The Framework for Growth identifies land that best meets the draft RSS criteria for strategic employment sites, and recommends that allocations be made. This includes the Martlesham Heath High Technology Cluster: *“Existing high technology development at Adastral Park is well related to major existing and proposed housing development in the Ipswich eastern fringe. Proposals for the development of Suffolk Innovation Park in this location are currently being progressed, in association with a remodelling of the existing Adastral Park. In the longer term, transport measures are likely to be required to address capacity issues on the A12 Ipswich eastern bypass and Ipswich radial routes both within and outside the town, arising from further development in this area.”*

## Regional Economic Strategy

- 5.10 “A shared vision” the Regional Economic Strategy for the East of England was published in December 2004 by the East of England Development Agency. The strategy recognises Adastral Park as, *“...a major regional and national asset. Further development to strengthen the links between the research community and the private sector could help build a regional ICT sector of international significance.”* (page 74)

## Structure Plan

- 5.11 The Suffolk County Structure Plan was adopted in 2001. Policy CS2 and Policy CS3 identify the Ipswich Policy Area as the location for both major employment development and housing development. The Structure Plan states in paragraphs 7.26 and 7.27 that *“British Telecom’s Advanced Communications Research Centre at Adastral Park Martlesham Heath is the largest high technology development in the county and is of major significance to the local economy. This facility begun to act as a focus and catalyst for further high technology development... In consultation with EEDA, local planning authorities should make particular efforts to facilitate the development of business clusters. These are of increasing importance as sources of innovation and drivers of economic growth. Adastral Park at Martlesham Heath is suitable as one such significant focus for a cluster in the high technology and knowledge-driven sector in Suffolk.”*

- 5.12 Policy ECON7 of the Structure Plan supports *“The establishment and growth of business clusters is supported, and provision for them will be considered in local plans, taking into account: (a) the role such development will play in meeting national, regional and county economic development and competitiveness objectives; (b) opportunities for clusters of telecommunications and information technology businesses in the Ipswich Policy area; (c) opportunities to attract high technology businesses offered by links to Cambridge; (d) special needs of other particular sectors and innovative activities; (e) the need for clusters to be well related to centres of population and employment and to respect policies for transport and protection of the environment. Land allocated for business clusters in accordance with these criteria will be protected from other forms of development. Adastral Park at Martlesham Heath is suitable as one significant focus for a business cluster in Suffolk.”*

## Local Plan

- 5.13 The current Local Plan was adopted by Suffolk Coastal District Council in 1994 and subject to a *First Alteration* which was adopted in 2001. A *Second Alteration*, dealing specifically with affordable housing, came into effect on 31 March 2006.
- 5.14 Adastral Park falls within the *Ipswich Eastern Fringe* which forms Chapter Thirteen of the adopted Local Plan. Adastral Park is recognised as a General Employment Area under policy AP216, to which policy AP51 applies. AP51 indicated that planning permission will normally be granted for Classes B1, B2 and B8 development. The supporting text to AP51 states that *“the District Council will seek to make maximum use of existing industrial land”* (Para 4.23) and stresses the importance to make *“maximum use of the land and buildings”* at Para 4.24.
- 5.15 The existing employment area of Adastral Park lies within the physical limits boundary of Martlesham Heath, as identified in policy AP27 and Inset Maps 1 and 1a Ipswich Eastern Fringe.
- 5.16 Under Policy AP217 Ipswich Fringe: BT Laboratories, Martlesham the use of land south and east of the “BT Laboratories” within open countryside for the testing of equipment was considered acceptable if there was no practical alternative and the impact on the countryside was considered acceptable.
- 5.17 Policy AP217 deals with BT’s Field Experimental Test Facilities. There is a presumption in favour of allowing these facilities on open countryside. In addition, the Local Plan identified a wider safeguarding zone to protect the test facilities from any development in the wider area which might be detrimental to the existing and future testing facilities.
- 5.18 BT now envisage that within the next 3 to 10 years the need to have a large open area test site and safeguarded area will no longer be necessary and that in this timeframe BT will be able to specify, design and build a new test facility that will meet the requirements for all radio testing for BT’s 21<sup>st</sup> Century Network.

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## Hi-Tech Cluster: Martlesham Heath, Area Specific Guidance

- 5.19 SCDC published Supplementary Planning Guidance (SPG) titled *Hi-Tech Cluster: Martlesham Heath, Area Specific Guidance* in June 2001. The document sought to foster a cluster of innovative businesses around Adastral Park and create a high quality environment for knowledge-based employment.
- 5.20 The SPG sought the development of an Innovation Park on an identified greenfield site south of Adastral Park on land owned by Grainger Trust plc. Grainger subsequently withdrew their support for the proposal. BT is now facilitating the Innovation Park within the northern part of Adastral Park.

## Emerging Supplementary Planning Document

- 5.21 In 2007, SCDC agreed that BT and David Lock Associates should begin the process of updating the SPG given BT's aspirations for Adastral Park, along with those of Dunedin, a neighbouring landowner that controls Martlesham Business Park to the north. A new Supplementary Planning Document has been drafted and will be published for public consultation in the summer of 2008.
- 5.22 The emerging SPD identified the following land uses as appropriate uses within the Martlesham Research and Business Campus (which comprises Adastral Park, Martlesham Business Park and gateway sites adjacent to the A12).
- B1 Business (B1a and B1b) Offices and Research and Development
  - B1 Business (B1c) Light Industry, B2 General Industry and B8 Distribution
  - Hotel (C1)
  - Leisure (D2)
  - Retail (A1)
  - Trade Counters (sui generis)
  - Food and Drink (A3/A4)
  - Residential

## Local Development Framework

- 5.23 SCDC has an emerging *Local Development Framework*. Go-East approved an amended *Local Development Scheme* in Spring 2007. The *Core Strategy Preferred Option* was published for public consultation in December 2008, along with the Issues and Options of the Site Allocation Development Plan Document.
- 5.24 The Council has published the following studies relevant to the employment proposals which form part of this application. These studies form the evidence base for the production of the Suffolk Coastal Local Development Framework.

- Employment Land Availability Study - April 2007  
Annual study giving details of land committed for industrial and business development as at 1 April 2007.
- Suffolk Coastal District Employment Study - July 2006  
Study commissioned to inform the development of employment policies for the District.

### Core Strategy Preferred Options

5.25 Suffolk Coastal District Council's *Core Strategy Preferred Options* document was published in December 2008. It states that the Core Strategy will provide 8,000 new jobs to meet the RSS requirement for the Haven Gateway sub-region to the period to 2021. The document goes on to identify the sites most likely to meet future demand, namely:

- Felixstowe Port; and
- Martlesham Heath Business Campus including Adastral Park.

5.26 The *Core Strategy* document recognises Adastral Park, Martlesham as a site of strategic regional significance, "*based on the reputation and international significance of the research establishment of British Telecom*" (para 3.26). The document recognises the importance of the development of the high-tech business cluster which "*will provide an invaluable contribution to the employment base not only of Ipswich and Suffolk Coastal*".

### Policy Compliance - Summary

5.27 This planning application proposes the development of up to **60,000 sqm net additional employment floorspace**, related car parking spaces and landscaping (B1). The above national, regional adopted local policy and emerging local planning policy clearly support the development of the jobs at the locally and regional important location of Adastral Park.

## 6.0 Housing

- 6.1 Chapter 5 of this Planning Statement demonstrates a favourable national planning policy basis against which this application should be considered. Chapter 6 identifies employment as one of two key elements of this application and examines the regional and local policy background.
- 6.2 This chapter examines the proposals for housing against Regional and Local Planning Policy. The planning application proposes the development of up to 2,000 homes in the period to 2025, and additional capacity is available for development beyond this period.

### Regional Spatial Strategy

- 6.3 The East of England Regional Assembly has prepared a new *Regional Spatial Strategy* (RSS) for the East of England called the *East of England Plan*. The East of England Plan was adopted by the Secretary of State in May 2008.
- 6.4 In respect of new housing provision, the RSS identifies a regional total of 508,000 new homes to be built by 2021. This equates to 25,400 per annum. The housing figures are expressly stated as minimum housing figures for the region, to be exceeded.
- 6.5 For Suffolk Coastal, policy H1: Regional Housing Provision 2001 to 2021 identifies 10,200 as the minimum number of new homes to build between April 2001 and 2021. The RSS indicates that between April 2001 to March 2006 2,560 homes were built at an average of 510 per annum with a minimum still to build (at that time) of 7,640. Of this number, the RSS indicates that 3,200 should be on the edge of Ipswich as part of the Ipswich Policy Area within which this application area falls.

### RSS Review

- 6.6 A partial review of the RSS is to be undertaken between 2009 and 2011 concentrating on housing and employment growth. Submission of the draft RSS is anticipated in March 2010 focusing on delivering the objectives of the Housing Green Paper and reflecting the priorities of Eco-towns and Growth Points.
- 6.7 The 2007 *Green Paper on Housing – Homes for the Future: More affordable, more sustainable* commissioned the National Housing and Planning Advice Unit (NHPAU) to provide the Government with advice about the supply ranges to be tested by Regional Planning Authorities in future Regional Spatial Strategy (RSS) reviews. The NHPAU published its paper “*Meeting the housing requirements of an aspiring and growing nation: taking the medium and long-term view - Advice to the Minister about the housing supply range to be tested by Regional Planning Authorities*” on 26 June 2008.
- 6.8 The NHPAU set out proposed supply ranges for housing in the period 2008 to 2026. For the East of England this proposes total net additions by 2020 of between 288,000 and 486,300 homes. This equates to average annual net additions of 30,600 to 39,200 homes in the period to 2026. The final recommendation on numbers is for the Regional Planning Bodies in conjunction

with Local Authorities. However, the upward projection of housing numbers to 2026 suggests a high probability of Suffolk Coastal being required to find additional housing sites in the period to 2026.

- 6.9 The covering letter to the report sent to Caroline Flint MP states, *“As you know, we are at the beginning of a period of adjustment in the housing market, which reached the top of the price cycle last year. While inevitably there is now a focus on short-term prospects and some uncertainty arising from this, for the sake of communities and future generations it is vital that planners and decision makers are focused on the medium and long term. There have always been ups and downs in the housing market, but the trend in prices is relentlessly upwards - real house price growth has averaged 2.8 per cent a year over the past 30 years. This cycle and trend will not be moderated until we have properly addressed supply, delivering the right number of new homes, of the right type, in the right place and at the right time.”*

### **Local Plan**

- 6.10 The current Local Plan was adopted by the Council in 1994 and subject to a *First Alteration* which was adopted in 2001. A *Second Alteration*, dealing specifically with affordable housing, came into effect on 31 March 2006. In order to ensure continuing planning policy coverage during the transition from the adopted Suffolk Local Plan to the new Local Development Framework, GO-East agreed to ‘save’ the majority of policies contained in the Local Plan.
- 6.11 The land which comprises this planning application lies within the *Ipswich Eastern Fringe* which forms Chapter Thirteen of the adopted Local Plan. Adastral Park is recognised as a General Employment Area under policy AP216 and lies within the physical limits boundary of Martlesham Heath, as identified in policy AP27. Land to the south and east of Adastral Park, which is the primary location for the proposed homes and other uses lies outside of the physical limits of Martlesham Heath as identified on the Local Plan proposal maps. This land, which comprises the Waldringfield Quarry, is identified as open countryside under policy AP8.
- 6.12 Policy AP8 – Countryside Protection states that *“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.”*
- 6.13 Brett Aggregates has been extracting sand and gravel from the BT-owned Waldringfield Quarry for many years. The quarry benefits from existing planning permissions to extract the aggregates. The quarry is anticipated to expand as it is identified as one of the County Council’s Preferred Options for minerals extraction in its Minerals Plan.
- 6.14 This planning application would see the phased extraction of aggregates alongside the redevelopment of Adastral Park and development of the residential-led, mixed-use development. Further explanation is provided in chapter 7.

- 6.15 Policy AP25 – General Policy of Restraint sets out a presumption against “*estate-scale development*”, other than within the defined physical limits of the Towns and permitted sites within the Ipswich Eastern fringe.

### **Local Development Framework**

- 6.16 SCDC has an emerging *Local Development Framework*. This emerging plan identifies land east of the Martlesham Heath, including land south and east of Adastral Park, subject of this application, as the Council’s preferred area for growth in the plan period to 2025. The following section details the LDF process to date.

### **Core Strategy**

- 6.17 In February 2007 SCDC publicly consulted on its *Core Strategy Issues and Options*. This set out a range of housing numbers and strategic locations split between the Ipswich Fringe (within which this applications falls), Felixstowe and the Trimleys, and other smaller settlements within the District. There were six options put forward. For the Ipswich Fringe the potential allocation ranged from 900 to 3620 additional homes.

- 6.18 The document also included a Vision for the Ipswich Policy Area in 2021 (page 20). This comprised:

- a) *An area which has created its own distinctive identity with smaller readily distinguishable neighbourhoods and communities within the larger area;*
- b) *An area which has embraced change and maximised opportunities to provide a full range of social and community facilities to complement and build on those already present for the benefit of existing and future populations;*
- c) *An area which includes a mix of uses, and size, type and tenure of dwellings to enable the creation of more sustainable communities;*
- d) *An area where public transport provision, foot and cycle paths have been upgraded and promoted to minimise the need to use private motor vehicles to access employment, schools and other key facilities;*
- e) *An area where development has been phased and scaled to ensure that new or upgraded utility and other social and community provision is provided in advance of or parallel to new housing and employment provision;*
- f) *An area where priority has been given to creating a safe and attractive environment, including the provision of advanced planting and landscaping to create new settlement boundaries that blend with the surrounding landscape; and*
- g) *An area where opportunities for new employment provision have been maximised, particularly those associated with the strategically important hi-tech business at BT and through the provision of new business starter units.”*

### **Further Issues and Options**

- 6.19 *Further Issues and Options* were published in February 2008. This examined in greater detail the spatial options for growth in the Ipswich Policy Area (formerly referred to by SCDC as the Ipswich Fringe) and for the Felixstowe Peninsula.

- 6.20 SCDC published five options for the Ipswich Policy Area. Although not site specific, BT's land holdings, subject of this application, fall within Option 4.

### **Preferred Option**

- 6.21 Further Issues and Options consultation ended 11<sup>th</sup> April 2008. SCDC's LDF Taskforce Group met on 28<sup>th</sup> July 2008 to consider all of the options for growth, the representations received and agree a Preferred Option for growth in the Ipswich Policy Area.
- 6.22 Section 5.2 of Appendix 1 of the Officer's Report to the Committee states that:

*"5.2 The identification of the preferred option for the location of future housing growth in the Suffolk Coastal part of the Ipswich Policy Area is based upon the following, all supported by consideration of the responses to consultation:*

*The conclusion is that the preferred option is Option 4 – land to the north, east and south of Martlesham Heath employment area (including Adastral Park). This is because:*

- *An analysis of each of the areas using an up to date evidence base*
- *An assessment of issues relating to the provision of infrastructure*
- *The sustainability appraisal of all of the options*

*5.3 Given all of the above the preferred option is: Option 4 – land to the north, east and south of Martlesham Heath employment area (including Adastral Park)*

*This is because:*

- a) In comparison with other areas which are predominantly farmland much of the area has the opportunity for mineral extraction before being developed*
- b) The land is immediately adjacent to a substantial employment area with the potential to intensify (see below)*
- c) The opportunity is available to create a new community (and not necessarily 'phase 2' of Martlesham Heath)*
- d) This community will be large enough to support new facilities and services, including a primary school, with the opportunity to consider sixth form provision building on the reputation and linked to Adastral Park*
- e) By creating a community there is the ability to ensure that infrastructure is in place and construction takes place in accordance with sound principles of sustainability*
- f) Public transport is in place (although it will be a substantial journey to Ipswich town centre without improvements taking place)*
- g) The potential impact on the AONB can be mitigated with strategic landscaping put in place at an early stage*

*b) Areas of biodiversity interest can be identified and enhanced*

*i) Access to the countryside can be improved, thereby creating green space*

5.4 However, development of this option must be guided by a masterplan and delivery plan that also addresses:

- (a) Safe and attractive links by cycling and walking to employment and current retail provision*
- (b) Improved (in terms of journey time) public transport into the town centre*
- (c) Access onto the A12 and the need to ensure that through traffic retains priority*
- (d) Phasing to ensure the provision of infrastructure at the right time and to relate sand extraction to the development of housing. In this respect the northern part offers the opportunity for the early delivery of housing not being constrained by mineral extraction.*

5.5 It is expected that Option 4 will provide land for the long-term needs of Ipswich beyond the plan period to 2025.

5.6 In respect of the relationship between Option 4 and employment, of the total 63 hectares making up the entire Martlesham Heath employment area, over 50 per cent (some 42 hectares) comprises the Adastral Park complex. This is a world renowned centre for communications and information technology research. It currently supports approximately 3600 jobs and complements the adjoining Business Park which contains more than 60 different companies providing about 500 jobs.

5.7 The employment area is a significant and growing source of new businesses. To recognise, and exploit, this potential, the District Council is working with landowners, including BT, to produce a masterplan with the objective of creating a Hi-Tech Cluster comprising:

- *redevelopment and new development within Adastral Park itself, including the development of an Innovation Campus. This seeks to replace obsolete and worn out buildings with new buildings of a high quality that meet the needs of BT and other businesses that are already on the site or may be attracted to locate there. These new buildings are proposed to be within a rejuvenated landscape that is structured around new and elegant boulevards and an extensive green landscape that incorporates social space, wildlife habitats, settings for buildings and car parking;*
- *the development and redevelopment of parts of Martlesham Heath Business Park to create new, high quality premises; and*
- *the development of a strategic gateway for the Hi-Tech Cluster.*

5.8 It is estimated that an additional 2500 jobs can be created, complementing housing development close by.”

6.23 The agreed resolution of the Local Development Framework Task Group was:

*“the task group endorses the choice of Option 4, land east of Martlesham, as its preferred option”.*

6.24 A special Cabinet meeting endorsed the LDF Taskforce Group decision on 21 October 2008.

6.25 The Preferred Options document was published for public consultation in December 2008. This includes the application site within the preferred option. This planning application meets the aspiration as set out within the emerging Core Strategy.

6.26 At paragraph 3.20-21 the Council’s preferred option is stated as follows:

*“...in order to create a new community/ neighbourhood alongside but not overwhelming existing communities at Martlesham, Martlesham Heath and nearby, neighbouring villages. The area of search for housing sites will extend in a “half collar” around the employment area at Martlesham Heath, including BT at Adastral Park. Opportunities for sites include within Martlesham village, on the old Felixstowe Road, the sand quarries east of Adastral Park and the farmland north of Waldringfield Road.”*

## Housing Numbers

6.27 The one outstanding difference between the approach endorsed by the emerging Local Development Framework and this application is the amount of housing proposed. The Core Strategy identifies the need for 1,050 dwellings in the plan period to 2025. This application seeks 2,000 in the same period.

### *Fifteen-year supply of land*

6.28 PPS3 requires local planning authorities to plan for continuous delivery of housing for at least 15 years from the date of adoption of development plan documents that deal with housing strategy, normally the Core Strategy.

6.29 Taking account of the sources of supply, SCDC have identified the following provision of housing in the district in the period 2008-2025 (Strategic Policy SP17 of the Core Strategy Preferred Options document, December 2008).

	<b>Ipswich Policy Area (Suffolk Coastal Part)</b>	<b>Rest of the District</b>	<b>Total</b>
Outstanding Planning Permissions (less 10%)	420	1360	1780
Urban Sites	180	850	1030
Small Sites	230	1090	1320
Allocations in Existing Local Plan carried forward	0	270	270
New Allocations	1050	2260	3310
<b>TOTAL</b>	<b>1880</b>	<b>5830</b>	<b>7710</b>
<b>Per annum</b>	<b>100</b>	<b>330</b>	<b>430</b>

6.30 The housing requirement for the Ipswich Policy Area in the period 2008-2025 is identified by SCDC as 1880 dwellings. When existing commitments are taken into account, new allocations for 1050 dwellings are identified. This planning application proposes up to 2,000 dwellings in the same plan period.

6.31 There are a number of reasons for proposing 2,000 dwellings rather than 1,050 in the period to 2025. These relate to:

1. The RSS housing requirements are minimum figures, to be exceeded; these minimum figures are already under review which is likely to lead to an increase

2. SCDC's requirement to maintain a 5 year supply of housing
3. A level of housing is required that has the necessary critical mass to provide for and support essential physical and social infrastructure.

*The RSS housing requirements are minimum figures*

6.32 Policy H1 of the East of England Plan expressly states that "District allocations should be regarded as minimum targets to be achieved, rather than ceilings which should not be exceeded". The housing figures contained within the Core Strategy Preferred Options should therefore be considered to be minimum figures. The expression of these figures as minima provides flexibility to address other, equally important considerations such as the availability and viability of social infrastructure and the creation of a sense of community. This flexibility allows SCDC to tailor allocations on particular sites to local circumstances and to meet local aspirations and targets.

6.33 There is a correlation between the creation of new jobs and new homes and BT would like to be influential in the availability of the right homes to attract talented people to sustain its R&D activities and those of other companies, located most sustainably.

6.34 Furthermore, there is every indication that the partial review of the RSS will revise the minimum housing requirements significantly further upward.

*Five Year Housing Supply*

6.35 PPS3 states that, from 1<sup>st</sup> April 2007, Local Planning Authorities must assess and demonstrate the extent to which existing plans already fulfil the requirement to identify and maintain a rolling 5-year supply of deliverable land for housing.

6.36 Paragraph 54 states that for sites to be considered deliverable they should be:

- **Available** the site is available now
- **Suitable** the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities; and
- **Achievable** there is a reasonable prospect of housing being delivered within five years.

6.37 SCDC's 5 Year Housing Supply was published on 31 March 2007. It identifies existing permitted sites and allocated sites to determine the likely level of development. SCDC conclude that they can achieve 5 years housing supply. The Council has identified a supply of 2452 dwellings which it suggests satisfies the requirements of PPS3 for the 5-year period 1<sup>st</sup> April 2007 - 31<sup>st</sup> March 2012. Of this number, SCDC identify 822 dwellings within the IPA including a likely excess of 537 dwellings.

6.38 One of the realities of the present market is that housing developers are not bringing forward development sites, land owners are reluctant to sell because values have reduced and developers are not purchasing land for development because of the uncertainty about mortgage availability and the effects on prospective buyers and house prices. This will be a particular constraint on

any sites traded recently at the peak of the market where value expectations are particularly high. In the context of the SCDC LDF, this is likely to be a short term issue but this is not certain. The application site is within the ownership of BT and BT is willing and able to bring forward its site for development at the earliest opportunity. At this stage it is anticipated that new homes can be delivered from 2011 onwards, and could make a contribution to the 5 year housing land shortfall, if required.

- 6.39 SCDC have not yet identified the further supply of specific, developable sites for years 6-10 as required by paragraph 55 of PPS3. Broad locations for future growth (which is the minimum for the 11-15 year period as set out in PPS3) have also not yet been identified. This application site can deliver a minimum of 2,000 dwellings over the whole LDF plan period to 2025, has the potential make up for any shortfalls in the early years, and has capacity for further development beyond the LDF plan period.

*A level of housing that supports social infrastructure*

- 6.40 SCDC has calculated that it needs to find land for 1050 homes east of Ipswich over the next plan period. This is a difficult scale of development that does not readily support a range of support services and facilities, particularly if the implementation period is prolonged and where the development site is relatively isolated from existing services and facilities.

- 6.41 A level of development is required which supports the provision and viability of a range of local facilities and services to reduce the need to travel (as required by PPG13), to reduce the impact and reliance on existing communities and infrastructure, and to aid the integration of the development into the wider area. This includes providing:

- A new primary school. The generally accepted, most efficient and effective form for a new primary school is a two form entry school for 420 pupils. The County Council's threshold to support a full, two-form entry school is 1800 to 2000 households;
- Health and welfare services such as doctors, dentists. Existing services are stretched so entirely new provision needs to be justified and supported;
- Social facilities such as a meeting hall and good public open space;
- A local centre with a small retail presence meeting local needs;
- Enhanced and viable public transport services;
- Support for a comprehensive and high quality landscape framework;
- Development capacity to properly mitigate off-site impacts;
- Capacity to make a real and early contribution to low carbon and renewable energy production and efficient energy consumption on-site.

- 6.42 Providing land for fewer than 2000 dwellings in any one location, at Adastral Park or elsewhere, constrains the range and viability of the physical and social infrastructure that can be provided. For example, it means a new primary school may not be deliverable. The pressure on existing infrastructure of a lesser development would be significant and in all areas there are local capacity issues.

## **Policy Compliance - Summary**

- 6.43 This planning application proposes up to 2,000 homes to be delivered in the plan period to 2025. The above national, regional adopted local policy and emerging local planning policy clearly support the development of new homes at the locally and regionally important location of Adastral Park. The level of development is in excess of that currently discussed through SCDC's Core Strategy, but is wholly acceptable on the basis of guidance as stated in the RSS and the background of Ministerial Statements and projected housing supply. This level of development supports the redevelopment of Adastral Park and could deliver around 2,000 additional jobs.

## 7.0 Delivery

### Strategic Context

- 7.1 There are significant capacity constraints in the whole of the east of Ipswich that put any future development in the area at risk. BT's delivery of this site, and its leverage as the regions primary employer, can help to resolve significant infrastructure issues.

### Energy Supply

- 7.2 There is insufficient capacity in the electricity network to maintain Adastral Park's growth and R&D investment and to facilitate new housing and other development that is required to the east of Ipswich (wherever it is located), including Felixstowe and its port. BT is working with EDF and other partners to address this issue and is proposing to use its own land assets to deliver a solution. This is likely to include the provision of sites for substations and a significant financial contribution to the necessary upgrades to the local network. However, BT is reluctant to make this effort and investment alone if other parties seeking to develop other land are to benefit from the solution without matching investment. However, if a mechanism is not found to apportion this investment among all who benefit the risks to employment expansion and to new homes, and to the retention of existing jobs could be significantly increased.

### Carbon Efficiency

- 7.3 Since it is currently dependent on a fragile electricity supply network and because it has existing corporate commitments to highly carbon efficient development and operations, BT is making comprehensive plans for carbon efficiency at Adastral Park. These plans should make it one of the most carbon efficient developments in the UK and could involve a highly flexible distribution network for all utilities and the provision of diverse energy generation on and around the development. BT has ambitions for a sustainable energy strategy for the regenerated Adastral Park, and this would be much more effective in terms of costs and operations if homes can be built adjacent to the employment area.
- 7.4 The efficiency and effectiveness of such a scheme is massively increased if there are domestic activities that use energy in the evenings and weekends to balance weekday peak loading of the commercial activities at Adastral Park, now and in the future. This is best provided by adjacent housing, hotels, etc which are part of a linked supply and distribution system. These in turn would be part of a highly carbon efficient development, unparalleled elsewhere in the UK. No other local site can approach this standard of sustainable development, so the opportunity is not one that should be passed up lightly.
- 7.5 An effective plan for the whole of this development could release capacity in the local electricity supply network by replacing grid supply with renewable local supply. However at this stage BT is reluctant to do this if it simply released capacity for the development of other competing land, particularly with no mechanism for the apportionment of costs.

- 7.6 These factors and the potential of this land could deliver a new community for Martlesham that achieves, in the 21st Century, a modern equivalent of what was created at Martlesham Heath in the 1970s. Coincidentally, the wider 1965 plan for Martlesham Heath envisaged expansion south and east of the then GPO site. BT's proposals are, in part, a realisation of that original vision.

### **Education**

- 7.7 It is clear from the County's school rolls that attendance at primary schools in surrounding villages is falling and that by 2012 the forecast pupil numbers will be much lower than capacity. BT have proposed a new primary school on site to meet the demands arising from the new homes, however the development may be able initially to support the existing local schools, safeguarding their future. This will require further investigation.

### **Health**

- 7.8 BT proposes a new local centre to serve the demands from the new homes. This could include a doctor's surgery and dentist to meet the needs of the new community. This would be separate from but complimentary to BT's own desire to bring occupational health services onto Adastral Park.

### **Transport**

- 7.9 The site is well related to the existing highway network being adjacent to the A12 and close to the A14. BT is working with Suffolk County and the Highways Agency to address the challenges that development brings to the local transport network. What is clear is that the pressures that are created are relevant to all the options for development in the IPA, and that through locating residential development adjacent to the area's largest employer, allied to other travel policies, the options to reduce this pressure are substantially improved.

### **Waldringfield Heath Quarry**

- 7.10 Brett Aggregates has been extracting sand and gravel from the BT-owned Waldringfield Quarry for many years. This planning application is located, in part, on the site of the Waldringfield Quarry. The quarry benefits from existing planning permissions to extract the aggregates and seek to expand its works to encompass all of the land outside of Adastral Park and within the redline application boundary.
- 7.11 In April 2007, BT and Brett Aggregates submitted representations to Suffolk County Council (SCC), as the Minerals Planning Authority, to extend the existing works to encompass the remainder of BT's undeveloped land, south and east of Adastral Park. The subsequent identification of this land as part of SCC's preferred options for aggregates production is welcomed and fully supported. BT, with the advice of its consultant team, has supported this allocation to avoid the problem of future development potential being frustrated by a need to protect unexploited mineral resources.

- 7.12 There is no conflict between the future opportunities to win the minerals and to develop the land. Indeed, the two programmes can be fully dovetailed. Existing and future sand and gravel extraction provides an excellent opportunity to re-contour the land and to prepare it for development to create an exciting new community with a heathland park at its heart and with green ‘fingers’ that integrate with the surrounding landscape. This will encourage future public access and enhance its quality as a wildlife habitat. Furthermore, re-contouring the land provides the opportunity to mitigate the visual impact of development.

### **Phasing**

- 7.13 BT is absolutely clear that there is no conflict between the allocation of the land for mineral extraction, and its development to meet housing and economic development objectives. The sand and gravels on the site can be excavated in a phased manner as the residential development is phased. The likely approach to phasing is detailed in the *Design and Access Statement*.
- 7.14 Planned properly, and with the confidence of a long-term plan for mineral extraction, restoring the land for development would be a very efficient and effective process that minimises the investment, resources and time employed. Use of imported clean material means that this land need not be at a significantly lower ground level. Levels can readily be contoured and landscaped using the previously stripped topsoil and subsoil, which are always stored on adjacent boundaries to await use in final restoration. As the mineral is extracted progressively across the site, development can take place.
- 7.15 In this way land for development can be prepared with great flexibility to meet master plan and development market requirements and the logistics and timetable of construction.
- 7.16 The expansion of the quarry is subject to its own minerals planning application to be submitted to Suffolk County Council shortly.

### **Timetable**

- 7.17 From BT’s commercial perspective, submitting a planning application and getting planning permission now means that it would be able to undertake aspects of the development straight away rather than having to wait until the LDF Core Strategy and Development Allocations DPD is adopted before planning permission sought. In view of existing slippage and the impending uncertainties created by Local Government Review, that would be a number of years away which may have a direct impact on BT’s commitment to Adastral Park. BT needs to continue to evolve and develop and have the facilities available to do that. Likewise, it needs to have those companies, with which it works with closely, located next to it in order to enhance market opportunity and to maintain and then grow the number of jobs which are sustained in the area and which could be increased into the future. 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.

- 7.18 The lead time for any development is between 3 and 5 years. If the planning application were not to be submitted until the Local Development Framework was finally determined, that might mean that development would not be operational on the site until perhaps 2015 at the earliest. Whereas, by submitting a planning application in the summer 2008, having it approved and implementing then the development should be in place by 2010/11. This would match BT's objectives to exploit its current research operations to attract other companies to co-locate, consolidate its reputation as a world leader and, most importantly, retain high value jobs locally.

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## 8.0 Affordable Housing Statement

8.1 BT recognises the need for affordable housing within Suffolk Coastal District. Approval of this planning application can have a positive impact on meeting this need.

8.2 Policy AP38A of the adopted Local Plan seeks 1 in 3 units to be affordable housing unless its provision is not required due to:

- Lack of identified local need in the area;
- Site conditions, suitability and economics of provision;
- The proximity of local services and facilities, as well as suitable access by public transport to a town or service centre;
- Whether the provision of affordable housing would prejudice the realisation of other planning objectives.

8.3 The Core Strategy Preferred Options document summarises the findings of the Council's Housing Assessment (2007) which concludes that the affordable housing requirement is 24% of the total new housing (19% social housing, 5% intermediate). Policy SP19 proposes to achieve 1900 affordable housing units across the district between 2007 and 2025.

8.4 There appears to be some contradiction with proposed policy DC2 which indicates that 1 in 3 units on residential sites will be expected to be affordable unless provision is not required due to:

- *Lack of identified local need in the area;*
- *Site conditions, suitability and economics of provision;*
- *The proximity of local services and facilities, as well as suitable access by public transport to a market town or key service centre; or*
- *Whether the provision of affordable housing would prejudice the realisation of other planning objectives.*

8.5 The following text has been drafted for inclusion within a Section 106 to be attached to any planning permission granted by the Council.

*“Provision of a percentage of affordable housing in all phases of the residential development that will be available to persons who cannot afford to rent or buy housing generally available on the open market. The percentage of affordable homes and the variety of tenures to be provided in each phase of development will be in accordance with agreements between Local Planning Authority, the Affordable Housing Provider and the Promoters reflecting planning policies in operation at the time of the agreement but may include the provision of sheltered housing, key worker housing and shared equity housing as well as social housing available to rent.”*

8.6 The timing and delivery of the affordable housing will be agreed through negotiation with the Local Planning Authority. In line with best practice the affordable housing will be “pepper potted” or spread across the whole development to ensure integration. The affordable housing will therefore be phased as within each development parcel.

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## 9.0 Draft Heads of Terms

### **WITHOUT PREJUDICE TO FURTHER NEGOTIATIONS BETWEEN THE APPLICANTS AND THE LOCAL PLANNING AUTHORITY**

- 9.1 Prior to the commencement of the development of Adastral Park the promoters can confirm they will enter into an agreement pursuant to section 106 of the Town and Country Planning Act 1990 ensuring the delivery of infrastructure and facilities relating to the development; these will be enforceable against the landowners and also any successors in title to or assigns. The agreement will not bind any person after they have disposed of all or the relevant part of their interest in the site.
- 9.2 The final decision relating to the exact nature and extent of the planning obligations to be included in the section 106 agreement will be subject to negotiation with the local authorities and other agencies through the course of the planning application process. It is expected that the final issue of the outline planning permission would be subject to the completion of a section 106 agreement.
- 9.3 This document outlines the planning obligations which at this stage are anticipated to be likely to be included in the s.106 legal agreement for Adastral Park.
- 9.4 For ease of reference and in accordance with the DCLG and Law Society Model s.106 agreement the document separates out the likely heads of terms to be entered into with the Local Planning Authority and with the County Council.

### **A – COVENANTS WITH SUFFOLK COASTAL DISTRICT COUNCIL**

#### **1. Open Space and Play Areas**

- Land and a capital funding contribution towards the provision of children's play areas and maintenance for a specified period to comprise 4 LEAPs (Local Equipped Areas of Play) and 1 NEAP (Neighbourhood Equipped Area of Play).
- Land specified on the development framework plan as public open space for recreational use in perpetuity and a capital funding contribution towards its maintenance.

#### **2. Central Park and Community Sports Pitches**

- Land and capital funding contributions towards the provision of a public Central Park which will include community sports pitches and associated facilities. It is anticipated that the playing pitches will comprise 2 football pitches, 1 cricket pitch, 3 tennis courts and 1 bowling green.

#### **3. Community Facilities**

- Either the land and a capital funding contribution towards the construction of a community building to include health facilities and a community meeting venue and the potential provision for emergency services, or the identification of a site and construction of the building at the promoter's expense with the subsequent transfer to the local planning authority or another competent body.

#### **4. Affordable Housing**

- Provision of a percentage of affordable housing in all phases of the residential development that will be available to persons who cannot afford to rent or buy housing generally available on the open market. The percentage of affordable homes and the variety of tenures to be provided in each phase of development will be in accordance with agreements between Local Planning Authority, the Affordable Housing Provider and the Promoters reflecting planning policies in operation at the time of the agreement but may include the provision of sheltered housing, key worker housing and shared equity housing as well as social housing available to rent.

#### **5. Public Art**

- Funding contributions towards the cost of the provision of public art within the scheme.

#### **6. Local Centre**

- The applicants will prepare a local centre brief and submit to the local planning authority for information prior to the marketing or development of the local centre.

#### **7. Management of Public Areas**

- The transfer of land and provision of a funding contribution towards the management and maintenance of certain public areas to either the local planning authority or an alternative competent body.
- The applicants will consult with the Local Planning Authority regarding the options for the transfer of the land and the responsibility for the management and maintenance for such informal and formal open space as well as the Central Park.

#### **8. Waste Collection**

- A funding contribution towards waste collection services and the wheelie bin storage and other appropriate sustainability initiatives and potentially an energy and innovation fund.

#### **9. Monitoring Reports**

- If reasonably required by the Local Planning Authority the applicants shall prepare and provide to the Local Planning Authority an annual report on the performance of relevant planning obligations to enable the monitoring of performance by the Local Planning Authority or alternatively, provide a financial contribution towards monitoring costs.

### **B – COVENANTS WITH SUFFOLK COUNTY COUNCIL**

#### **1. Highway Works**

- A funding contribution towards the new highway works required for vehicular and/or pedestrian use and/or improvements to existing public highways. These are likely to include a contribution towards improvement works to the A12 to be specified in the s106.
- A funding contribution towards off-site traffic management for additional traffic calming and highway improvements to mitigate the increased traffic impact on the surrounding road network which is directly attributable to the development.
- A funding contribution towards monitoring off-site traffic flows arising from the development.

## **2. Public Transport and Non-Car Modes**

- A funding contribution towards the provision of new public transport services to be provided to serve the development during a prescribed funding period.
- The provision of bridle way links, cycle way links and footpath links and a contribution towards the improvement of links to off-site cycleways, footpaths and bridleways surrounding the site.
- The preparation of a travel plan to apply to the overall development and seek to result in a modal shift.

## **3. Education**

- Land and capital funding contributions for the provision of one two-form entry primary school. Consideration to be given towards land and capital funding contributions for secondary school provision.

## **4. Library**

- A financial contribution towards the existing library provision or the mobile library service.

## **5. Waste Minimisation**

- A financial contribution towards waste-minimisation schemes and a recycling promotion scheme.

## **6. Monitoring**

- If reasonably required by the Local Planning Authority, the applicants shall prepare and provide to the Local Planning Authority an annual report on the performance of relevant planning obligations to enable the monitoring of performance by the Local Planning Authority or, alternatively, provide a financial contribution towards monitoring costs.

## **7. Allotments**

- Allotments will be provided as shown on the planning application drawings

## 10.0 Draft Conditions

10.1 It is anticipated that a number of matters will be the subject of conditions to be attached to the planning permission. For ease of consideration we have set out below a draft list of matters that might be included. The list is not intended to be exhaustive, but confirms the key areas for which it is anticipated at this stage may be the subject of a condition.

### 1. Level of Development

- The development hereby permitted shall not be for any more than 60,000 sqm B1 and up to 2,000 dwellings.

### 2. Reserved Matters

- Approval of details of the reserved matters for each phase of the site which will be in general accordance with the development framework plan submitted in support of this planning application or in accordance with any subsequent amendments to the Development Framework Plan which may subsequently be approved in writing by the Local Planning Authority (LPA).
- Application for approval of the reserved matters shall be made to the LPA before the expiration of ten years from the date of this permission (number of years to be agreed).
- The development hereby permitted shall be begun either before the expiration of x years from the date of this permission or before the expiration of x years from the date of approval of the last of the reserved matters to be approved, whichever is the latest. (number of years to be agreed)
- Details submitted in support of reserved matters applications shall include finished floor levels and finished site levels in relation to the existing site levels and the level of the adjacent highway.
- Details submitted in support of reserved matters applications shall include the adoptable estate roads, footways, cycleways and bridleways for each phase to be approved by the LPA prior to commencement of development of that phase.
- Details submitted in support of reserved matters applications for residential development shall include a scheme for parking and garaging and manoeuvring of delivery vehicles for each dwelling or other building forming part of the development.
- Details submitted in support of reserved matters applications shall include provision for internal and external refuse and recycling storage facilities.
- Details submitted in support of reserved matters applications for residential development shall include the proposed boundary treatments of the plots. The scheme shall show the type and height of fences, hedges, walls or other means of enclosure and these should be in accordance with the guidance in the design code for that phase.

### 3. Phasing

- A programme for phasing to be submitted and approved by the local planning authority prior to the commencement of development.

### 4. Design Briefs

- Design briefs for each phase of the residential development complementary to the Design and Access Statement hereby permitted shall be submitted to and approved by the LPA before development of each of the phases commences. Reserved matters applications for each phase will be required to be in accordance with the design briefs unless formally agreed in writing with the LPA.

## **5. External Materials**

- External materials for each phase to be submitted to and approved by the LPA.

## **6. Drainage**

- The development of each phase of development shall not commence until the details of a sustainable drainage system for the disposal of surface water from that phase of development has been submitted to and approved in writing by the LPA. No dwellings shall be occupied in each agreed phase of development until the relevant phase of works for the disposal of surface water has been completed.
- Other drainage/sewage conditions

## **7. Environmental Mitigation Scheme**

- The development of each phase shall not commence until a scheme for the provision of ecological protection and enhancements has been submitted to and approved by the LPA for that phase. The mitigation measures shall thereafter be implemented in accordance with the approved scheme and include the protected species identified within that scheme.

## **8. Archaeology**

- No development shall take place until there has been secured the implementation of a mitigation scheme, or a programme of archaeological work and publication in accordance with a written scheme of investigations which has been submitted and approved by the Council's archaeological officer.

## **9. Ecological Enhancements**

- No development shall take place in each phase until a scheme of ecological enhancements for both habitats and species, in conjunction with an associated management plan to ensure their future maintenance has been agreed with the LPA.

## **10. Children's Play**

- If to be provided by developer, a condition requiring the details of the local play area and associated open space to be submitted to and approved by the LPA before any dwellings are occupied in the phase of development that includes the play area.

## **Other General Matters**

### **Landscape / Tree Root Protection etc**

### **Open Space**

### **External Lighting proposals / prevention of lighting pollution**

### **Ground remodelling**